

Oneida Business Committee



Executive Session
10:00 AM Tuesday, August 25, 2026
BC Conference Room, 2nd Floor, Norbert Hill Center

Regular Meeting
8:30 AM Wednesday, August 26, 2026
BC Conference Room, 2nd Floor, Norbert Hill Center

Agenda

Meeting agenda is available here: oneida-nsn.gov/government/business-committee/agendas-packets/. Materials for the "General Tribal Council" section of the agenda, if any, are available to enrolled members of the Oneida Nation; to obtain a copy, visit the Government Administrative Office, 1st floor, Norbert Hill Center and present a valid Tribal I.D. or go to <https://goo.gl/uLp2jE>. Scheduled times are subject to change.

I. CALL TO ORDER

II. OPENING

III. ADOPT THE AGENDA

IV. MINUTES

- A. Approve the August 12, 2026, regular Business Committee meeting minutes**
Sponsor: Lisa Liggins, Secretary

V. RESOLUTIONS

- A. Adopt resolution entitled Resolution to Terminate Oneida Nation Deferred Compensation Plan**
Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer
- B. Adopt resolution entitled Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan**
Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer

VI. APPOINTMENTS

- A. Determine next steps regarding one (1) vacancy - Anna John Resident Centered Care Community Board**
Sponsor: Lisa Liggins, Secretary

- B. Determine next steps regarding two (2) vacancies - Bay Bancorporation Board of Directors**
Sponsor: Lisa Liggins, Secretary
- C. Determine next steps regarding six (6) vacancies - Oneida Election Board - Ad Hoc Committee**
Sponsor: Lisa Liggins, Secretary

VII. STANDING COMMITTEES

A. FINANCE COMMITTEE

- 1. Accept the July 23, 2026, regular Finance Committee meeting minutes**
Sponsor: Lawrence Barton, Treasurer

B. LEGISLATIVE OPERATING COMMITTEE

- 1. Accept the August 5, 2026 Legislative Operating Committee meeting minutes**
Sponsor: Jameson Wilson, Councilman
- 2. Accept the Legislative Operating Committee 2023-2026 End of Term report**
Sponsor: Jameson Wilson, Councilman
- 3. Adopt Real Property Law - Chapter 601 - Rule No. 3 - Easements Amendments**
Sponsor: Jameson Wilson, Councilman
- 4. Adopt Technology Resources Law - Chapter 215 - Rule # 001- Acceptable Use**
Sponsor: Jameson Wilson, Councilman
- 5. Adopt Technology Resources Law - Chapter 215 - Rule # 002 - Clear Desk/Screen**
Sponsor: Jameson Wilson, Councilman
- 6. Adopt Technology Resources Law - Chapter 215 - Rule # 003 - Asset Management**
Sponsor: Jameson Wilson, Councilman
- 7. Adopt Technology Resources Law - Chapter 215 - Rule # 004 - Security Awareness Training**
Sponsor: Jameson Wilson, Councilman
- 8. Adopt Technology Resources Law - Chapter 215 - Rule # 008 - Third Party Providers**
Sponsor: Jameson Wilson, Councilman
- 9. Adopt Technology Resources Law - Chapter 215 - Rule # 009 - Generative AI Usage**
Sponsor: Jameson Wilson, Councilman

VIII. TRAVEL REQUESTS

- A. **Enter the e-poll results into the record regarding the approved travel request - Councilwoman Jennifer Webster - Administration for Children & Family Tribal Advisory Committee Consultation - Washington D.C. - August 24-26, 2026**
Sponsor: Jennifer Webster, Councilwoman

IX. NEW BUSINESS

- A. **Review the Oneida Minimum Internal Controls Chapter 8 Sports Wagering and determine next steps**
Sponsor: Mark A. Powless Sr., Chair/Oneida Gaming Commission
- B. **Accept the 2026 General Election final report and declare the official results**
Sponsor: Tina Skenandore, Vice Chair/Oneida Election Board
- C. **Accept the final closure recommendation for the remaining Tribal Contribution Savings Projects**
Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer/Jo Anne House, Chief Counsel

X. REPORTS**A. OPERATIONAL**

1. **Accept the Emergency Management FY-2026 3rd quarter report**
Sponsor: Kaylynn Biely, Emergency Management Director
2. **Accept the Intergovernmental Affairs Director FY-2026 3rd quarter report**
Sponsor: Melinda J. Danforth, Intergovernmental Affairs Director

B. TRIBALLY CHARTERED ENTITIES

1. **Accept the Bay Bancorporation, Inc. FY-2026 3rd quarter report**
Sponsor: Jeff Bowmn, President/Bay Bank
2. **Accept the Oneida ESC Group, LLC FY-2026 3rd quarter report**
Sponsor: Debra Powless, Interim Member/Oneida ESC Group Board of Managers
3. **Accept the Oneida Golf Enterprise FY-2026 3rd quarter report**
Sponsor: Justin Nishimoto, Economic Strategy Coordinator
4. **Accept the Oneida Youth Leadership Institute FY-2026 3rd quarter report (not submitted)**
Sponsor: Elijah Metoxen, Board Member, Oneida Youth Leadership Institute

XI. GENERAL TRIBAL COUNCIL

- A. Schedule the 2027 annual General Tribal Council meeting**
Sponsor: Lisa Liggins, Secretary
- B. Schedule the 2027 semi-annual General Tribal Council meeting**
Sponsor: Lisa Liggins, Secretary

XII. EXECUTIVE SESSION**A. REPORTS**

- 1. Accept the CEO-Oneida Casino & Hotel FY-2026 3rd quarter report (10:00 a.m.)**
Sponsor: Taryn Webster, CEO-Oneida Casino Hotel
- 2. Accept the CEO-Retail Operations FY-2026 3rd quarter report (10:30 a.m.)**
Sponsor: James Petitjean, CEO-Retail
- 3. Accept the CEO-Human Resources FY-2026 3rd quarter report (11:00 a.m.)**
Sponsor: Laura Laitinen-Warren, CEO-Human Resources
- 4. Accept the Treasurer's July 2026 report (11:30 a.m.)**
Sponsor: Lawrence Barton, Treasurer
- 5. Determine next steps regarding the 2026 Statewide Sports Wagering Negotiation Points (2:30 p.m.)**
Sponsor: Melinda J. Danforth, Intergovernmental Affairs Director
- 6. Accept the Bay Bancorporation, Inc. FY-2026 3rd quarter executive report (1:30 p.m. on 8/26/2026)**
Sponsor: Jeff Bowman, President/Bay Bank
- 7. Accept the Oneida ESC Group, LLC FY-2026 3rd quarter executive report (2:00 p.m. on 8/26/2026)**
Sponsor: Matthew Kunstman, Interim President-CEO/Oneida ESC Group, LLC
- 8. Accept the Oneida Golf Enterprise FY-2026 3rd quarter executive report (2:30 p.m. on 8/26/2026)**
Sponsor: Justin Nishimoto, Agent/Oneida Golf Enterprise
- 9. Accept the Analyses of Tribally Chartered Entities FY-2026 3rd quarter executive report**
Sponsor: Justin Nishimoto, Economic Strategy Coordinator
- 10. Accept the Economic Strategy Coordinator FY-2026 3rd quarter report**
Sponsor: Justin Nishimoto, Economic Strategy Coordinator
- 11. Accept the Chief Financial Officer August 2026 report**
Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer

12. **Defer the Government Administration Director FY-2026 3rd quarter report to the September 23, 2026, regular Business Committee meeting**
Sponsor: Lisa Liggins, Secretary

B. NEW BUSINESS

1. **Approve sixty-four (64) new enrollments**
Sponsor: Teresa Schuman, Chair/Oneida Trust Enrollment Committee
2. **Review application for one (1) vacancy - Anna John Resident Centered Care Community Board**
Sponsor: Lisa Liggins, Secretary
3. **Review applications for two (2) vacancies- Bay Bancorporation Board of Directors**
Sponsor: Lisa Liggins, Secretary
4. **Review application(s) for six (6) vacancies- Oneida Election Board - Ad Hoc Committee**
Sponsor: Lisa Liggins, Secretary

XIII. ADJOURN

Posted on the Oneida Nation's official website, www.oneida-nsn.gov pursuant to the Open Records and Open Meetings law (§ 107.14.)

The meeting packet of the open session materials for this meeting is available by going to the Oneida Nation's official website at: oneida-nsn.gov/government/business-committee/agendas-packets/

For information about this meeting, please call the Government Administrative Office at (920) 869-4364 or (800) 236-2214

Approve the August 12, 2026, regular Business Committee meeting minutes

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☒ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☐ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☒ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Lisa Liggins, Secretary

Primary Requestor: _____

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: BPIGMAN

DRAFT**Oneida Business Committee****Executive Session****8:30 AM Tuesday, August 11, 2026****BC Conference Room, 2nd Floor, Norbert Hill Center****Regular Meeting****8:30 AM Wednesday, August 12, 2026****BC Conference Room, 2nd Floor, Norbert Hill Center****Minutes****EXECUTIVE SESSION****Present:** Chairman Tehassi Hill, Treasurer Lawrence Barton, Council members: Jonas Hill, Kirby Metoxen, Jennifer Webster, Jameson Wilson;**Not Present:** Secretary Lisa Liggins;**Arrived at:** n/a;**Others present:** Jo A. House, RaLinda Ninham-Lamberies, Mark W. Powless (via Microsoft Teams), Melinda J. Danforth (via Microsoft Teams), Chad Fuss (via Microsoft Teams¹), Taryn Webster (via Microsoft Teams), Danelle Wilson (via Microsoft Teams), Laura Laitinen-Warren (via Microsoft Teams), Kaylynn Biely (via Microsoft Teams), James Bittorf (via Microsoft Teams), Carl Artman (via Microsoft Teams), Victoria Krueger (via Microsoft Teams), Mercie Danforth (via Microsoft Teams), David Jordan (via Microsoft Teams), Jessalyn Harvath (via Microsoft Teams), Nicole Rommel (via Microsoft Teams), Kristal Hill (via Microsoft Teams), Tina Jorgenson (via Microsoft Teams), Danielle White (via Microsoft Teams), Cheryl-Aliskwet J. Ellis (via Microsoft Teams), Kristine Hill (via Microsoft Teams),**REGULAR MEETING****Present:** Chairman Tehassi Hill, Treasurer Lawrence Barton, Secretary Lisa Liggins, Council members: Kirby Metoxen, Jennifer Webster, Jameson Wilson;**Not Present:** Councilman Jonas Hill**Arrived at:** n/a;**Others present:** Jo A. House, RaLinda Ninham-Lamberies, Mark W. Powless, Kaylynn Biely (via Microsoft Teams), Sidney White (via Microsoft Teams), Taryn Webster (via Microsoft Teams), Kristine Hill (via Microsoft Teams), Janice Decorah (via Microsoft Teams), Fawn Cottrell (via Microsoft Teams), Fawn Billie (via Microsoft Teams), Kristal Hill (via Microsoft Teams), Melissa Alvarado (via Microsoft Teams), David P. Jordan (via Microsoft Teams), Rhiannon Metoxen (via Microsoft Teams), Rae Skenandore (via Microsoft Teams), Mary Graves (via Microsoft Teams), Grace Elliott (via Microsoft Teams), Loucinda Conway (via Microsoft Teams), Carolyn Salutz (via Microsoft Teams), Crystal Holtz (via Microsoft Teams), Sarah Capelle (via Microsoft Teams), Patricia King (via Microsoft Teams), Brooke Doxtator (via Microsoft Teams), Martin Prevost (via Microsoft Teams), Amber Vankirk (via Microsoft Teams), Shannon Davis (via Microsoft Teams), Crystal Danforth (via Microsoft Teams), Gina Buerostro (via Microsoft Teams), Mkedemkokwe Montgomery (via Microsoft Teams), Eddy Horkman (via Microsoft Teams), Michelle R. Hill (via Microsoft Teams), Mia Charnon (via Microsoft Teams), Peter J. Skenandore (via Microsoft Teams), Barbara Webster (via Microsoft Teams), Derick Denny (via Microsoft Teams), Lisa Rauschenbach (via Microsoft Teams), Scott Denny (via Microsoft Teams), Michelle Braaten (via Microsoft Teams), Thurston Denny (via Microsoft Teams), Julie King (via Microsoft Teams), Nicolas Reynolds (via Microsoft Teams), Stephanie J. Metoxen (via Microsoft Teams), Dana McLester (via Microsoft Teams), Brandon Yellowbird-Stevens (via Microsoft Teams), Patricia Moore (via Microsoft Teams), Quailen Thao (via Microsoft Teams), Cheryl-Aliskwet J. Ellis (via Microsoft Teams), Stephanie Metoxen, Dustin Teller, Derrick King, Brian Denny, Beverly Anderson, Winnifred Thomas, Alexis Woelfel, Brandon Vande Hei, Bonnie Pigman (via Microsoft Teams),

¹ Microsoft Teams is software which provides a communication and collaboration platform for workplace chat, file sharing, and video meetings.

DRAFT

I. CALL TO ORDER

Meeting called to order by Chairman Tehassi Hill at 8:30 a.m.

For the record: Councilman Jonas Hill is out attending the CERS Fundraising Event in Verona, WI, at the request of Intergovernmental Affairs.

II. OPENING (00:00:41)

Opening provided by Councilman Kirby Metoxen.

III. ADOPT THE AGENDA (00:01:10)

Motion by Lisa Liggins to adopt the agenda with five (5) additions, [1) under the Resolutions section, add item entitled Adopt resolution entitled Office on Violence Against Women-FY2026 Grants to Indian Tribal Governments Program Grant Application; 2) under the Executive Session, New Business section, add item entitled Accept the 3rd Quarter Tribal Contributions Savings Projects reports as information; 3) under the Executive Session, New Business section, add item entitled Review the Consolidated Report on balances & budget plans for the Tribal Contributions Savings Projects and determine next steps; 4) under the Executive Session, New Business section, add item entitled Determine next steps regarding the 2026 Statewide Mobile Sports Betting Negotiations points; and 5) under the Executive Session, New Business section, add item entitled Approve the limited waiver of sovereign immunity - University of Wisconsin Green Bay Athletics Department & Sponsorship Agreement - file # 2026-0597], seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

IV. OATH OF OFFICE

- A. Anna John Resident Centered Care Community Board - Patricia Moore (00:02:58)**
Sponsor: Lisa Liggins, Secretary

Oath of office was administered by Secretary Lisa Liggins. Patricia Moore was present via Microsoft Teams.

- B. Oneida Public Safety and Security Commission - Beverly Anderson (00:04:34)**
Sponsor: Lisa Liggins, Secretary

Oath of office was administered by Secretary Lisa Liggins. Beverly Anderson was present.

- C. Oneida Youth Leadership Institute Board - Brian Denny Jr. (00:08:17)**
Sponsor: Lisa Liggins, Secretary

Oath of office was administered by Secretary Lisa Liggins. Brian Denny Jr. was present.

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- D. Pardon and Forgiveness Screening Committee - Brandon Vande Hei and Alexis Woelfel (00:09:59)**
Sponsor: Lisa Liggins, Secretary

Oath of office was administered by Secretary Lisa Liggins. Brandon Vande Hei and Alexis Woelfel were present.

Councilman Kirby Metoxen left at 8:40 a.m.

Item XI.A.1. was addressed next.

V. MINUTES

- A. Approve the July 22, 2026, regular Business Committee meeting minutes (00:19:05)**
Sponsor: Lisa Liggins, Secretary

Motion by Lawrence Barton to approve the July 22, 2026, regular Business Committee meeting minutes, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

VI. RESOLUTIONS

- A. Adopt resolution entitled Oneida Nation Pre-Disaster Mitigation Plan 2026-2031 (00:19:27)**
Sponsor: Kaylynn Biely, Emergency Management Director

Motion by Lisa Liggins to adopt resolution # 08-12-26-A Oneida Nation Pre-Disaster Mitigation Plan 2026-2031, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

- B. Adopt resolution entitled Extension of the Emergency Adoption of the Safe Neighborhoods Law (00:21:10)**
Sponsor: Jameson Wilson, Councilman

Motion by Lisa Liggins to adopt resolution # 08-12-26-B Extension of the Emergency Adoption of the Safe Neighborhoods Law, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

DRAFT**C. Adopt resolution entitled Amendments to the Code of Ethics Law (00:24:17)**

Sponsor: Jameson Wilson, Councilman

Motion by Lawrence Barton to adopt resolution # 0812-26-C Amendments to the Code of Ethics Law, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

D. Adopt resolution entitled Amendments to the Boards, Committees, and Commissions Law (00:29:48)

Sponsor: Jameson Wilson, Councilman

Motion by Lisa Liggins to adopt resolution # 08-12-26-D Amendments to the Boards, Committees, and Commissions Law with one (1) noted change [in line 52 of the clean copy, delete "means Boards, Committees, Commissions Department" and add "means the office or personnel assigned to assist Boards, Committees, and Commissions"], seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

E. Adopt resolution entitled Office on Violence Against Women-FY2026 Grants to Indian Tribal Governments Program Grant Application (00:50:42)

Sponsor: Mark W. Powless, CEO-Nation Services

Motion by Jennifer Webster to adopt resolution # 08-12-26-E Office on Violence Against Women-FY2026 Grants to Indian Tribal Governments Program Grant Application, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

VII. APPOINTMENTS**A. Enter the e-poll results into the record regarding the appointment of Brandon VandeHei and Alexis Woelfel to the Pardon and Forgiveness Screening Committee (00:51:05)**

Sponsor: Lisa Liggins, Secretary

Motion by Jennifer Webster to enter the e-poll results into the record regarding the appointment of Brandon VandeHei and Alexis Woelfel to Pardon and Forgiveness Screening Committee seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**VIII. STANDING COMMITTEES****A. FINANCE COMMITTEE****1. Accept the July 9, 2026, regular Finance Committee meeting minutes (00:51:40)**

Sponsor: Lawrence Barton, Treasurer

Motion by Jennifer Webster to accept the July 9, 2026, regular Finance Committee meeting minutes, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

B. LEGISLATIVE OPERATING COMMITTEE**1. Accept the July 15, 2026, regular Legislative Operating Committee meeting minutes (00:52:00)**

Sponsor: Jameson Wilson, Councilman

Motion by Lawrence Barton to accept the July 15, 2026, regular Legislative Operating Committee meeting minutes, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

IX. TRAVEL REQUESTS**A. Approve the travel request - Councilwoman Jennifer Webster - 57th Annual National Indian Education Association (NIEA) Convention - Buffalo, NY - October 7-11, 2026 (00:52:21)**

Sponsor: Jennifer Webster, Councilwoman

Motion by Lawrence Barton to approve the travel request for Councilwoman Jennifer Webster and two (2) additional Business Committee members to attend the 57th Annual National Indian Education Association (NIEA) Convention in Buffalo, NY on October 7-11, 2026, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

B. Approve the travel request - Councilwoman Jennifer Webster - Department of Health & Human Services Secretary's Tribal Advisory Committee (STAC) - Jamal, CA - September 21-25, 2026 (00:54:58)

Sponsor: Jennifer Webster, Councilwoman

Motion by Kirby Metoxen to approve the travel request for Councilwoman Jennifer Webster to attend the Department of Health & Human Services Secretary's Tribal Advisory Committee (STAC) in Jamal, CA on September 21-25, 2026, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

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- C. Approve the travel request - Councilman Jameson Wilson - 83rd National Congress of American Indians Annual (NCAI) Conference & Marketplace - Palm Springs, CA - October 18-23, 2026 (00:56:24)**
Sponsor: Jameson Wilson, Councilman

Motion by Jennifer Webster to approve the travel request from Councilman Jameson Wilson and two (2) additional Business Committee members to attend the 83rd National Congress of American Indians Annual (NCAI) Conference & Marketplace in Palm Springs, CA on October 18-23, 2026 and to require the travelers to have a prep meeting with Intergovernmental Affairs to organize the schedule coverage during the event, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

- D. Approve the travel request in accordance with §219.16-1 for seven (7) Oneida Gaming Commission staff - National Tribal Gaming Commissioners & Regulators (NTGCR) - Prior Lake, MN - August 31 - September 4, 2026 (00:58:28)**
Sponsor: Mark A. Powless Sr., Chair/Oneida Gaming Commission

Motion by Jennifer Webster to approve the travel request in accordance with §219.16-1 for seven (7) Oneida Gaming Commission staff to attend the National Tribal Gaming Commissioners & Regulators (NTGCR) in Prior Lake, MN on August 31 - September 4, 2026, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

- E. Enter the e-poll results into the record regarding the approved travel request - Chairman Tehassi Hill - Prediction Market Roundtable Discussion - Washington, D.C. - August 3-5, 2026 (01:01:18)**
Sponsor: Lisa Liggins, Secretary

Motion by Lisa Liggins to enter the e-poll results into the record regarding the approved travel request for Chairman Tehassi Hill to attend the Prediction Market Roundtable Discussion in Washington, D.C. on August 3-5, 2026, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

- F. Enter the e-poll results into the record regarding the approved travel request - Councilwoman Jennifer Webster - Administration for Children & Families and Tribal Advisory Committee - Worley, ID - August 3-6, 2026 (01:01:41)**
Sponsor: Jennifer Webster, Councilwoman

Motion by Kirby Metoxen to enter the e-poll results into the record regarding the approved travel request for Councilwoman Jennifer Webster to attend the Administration for Children & Families and Tribal Advisory Committee in Worley, ID on August 3-6, 2026, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

DRAFT**X. NEW BUSINESS****A. Accept the memorandum regarding the progress report on the General Welfare Assistance (GWA) as income for rent calculations (01:02:31)**

Sponsor: Mark W. Powless, CEO-Nation Services

*Secretary Lisa Liggins left at 9:34 a.m.**Secretary Lisa Liggins returned at 9:39 a.m.*

Motion by Jennifer Webster to accept the memorandum regarding the progress report on the General Welfare Assistance (GWA) as income for rent calculations, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

B. Accept the Nation Building Closeout Report for term 2023-2026 (01:13:54)

Sponsor: Lisa Summers, Government Administration Director

Motion by Lisa Liggins to accept the Nation Building Closeout Report for 2023-2026 term, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

C. Enter the e-poll results into the record regarding the approved letter of support for the Ukwakhwa, Inc. grant application to the Shakopee Mdewakanton Sioux Community Grants Program (01:16:12)

Sponsor: Lisa Liggins, Secretary

Motion by Jennifer Webster to enter the e-poll results into the record regarding the approved letter of support for the Ukwakhwa, Inc. grant application to the Shakopee Mdewakanton Sioux Community Grants Program, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson
Not Present: Jonas Hill

Item XII.A. was addressed next.

DRAFT**XI. REPORTS****A. APPOINTED BOARDS, COMMITTEES, COMMISSIONS****1. Accept the Anna John Resident Centered Care Community Board FY-2026 3rd quarter report (00:11:53)**

Sponsor: Lynn Metoxen, Chair/Anna John Resident Centered Care Community Board

Councilman Kirby Metoxen returned at 8:42 a.m.

Motion by Jennifer Webster to accept the Anna John Resident Centered Care Community Board FY-2026 3rd quarter report, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Jennifer Webster, Jameson Wilson
Abstained: Kirby Metoxen
Not Present: Jonas Hill

2. Accept the Oneida Community Library Board FY-2026 3rd quarter report (00:12:19)

Sponsor: Stephanie Metoxen, Chair/Oneida Community Library Board

Motion by Jennifer Webster to accept the Oneida Community Library Board FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster, Jameson Wilson
Not Present: Jonas Hill

3. Accept the Oneida Nation Arts Board FY-2026 3rd quarter report (00:13:18)

Sponsor: Harmony Hill, Chair/Oneida Nation Arts Board

Motion by Jennifer Webster to accept the Oneida Nation Arts Board FY-2026 3rd quarter report, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster, Jameson Wilson
Not Present: Jonas Hill

4. Accept the Oneida Nation Veterans Affairs Committee FY-2026 3rd quarter report (00:13:38)

Sponsor: Gerald Cornelius, Chair/Oneida Nation Veterans Committee

Motion by Jennifer Webster to accept the Oneida Nation Veterans Affairs Committee FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster, Jameson Wilson
Not Present: Jonas Hill

DRAFT**5. Accept the Oneida Public Safety and Security Commission FY-2026 3rd quarter report (00:14:04)**

Sponsor: Richard VanBoxtel, Chair/Oneida Public Safety and Security Commission

Motion by Jennifer Webster to accept the Oneida Public Safety and Security Commission FY-2026 3rd quarter report, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

6. Accept the Oneida Pardon & Forgiveness Screening Committee FY-2026 3rd quarter report (00:14:25)

Sponsor: Julie King, Vice Chair/Pardon and Forgiveness Screening Committee

Motion by Kirby Metoxen to accept the Oneida Pardon & Forgiveness Screening Committee FY-2026 3rd quarter report, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

7. Accept the Southeastern Wisconsin Oneida Tribal Services Advisory Board FY-2026 3rd quarter report (00:14:46)

Sponsor: Diane Hill, Chair/Southeastern Wisconsin Oneida Tribal Services Advisory Board

Motion by Jennifer Webster to accept the Southeastern Wisconsin Oneida Tribal Services Advisory Board FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

B. ELECTED BOARDS, COMMITTEES, COMMISSIONS**1. Accept the Oneida Election Board FY-2026 3rd quarter report (00:15:14)**

Sponsor: Tina Skenandore, Vice Chair/Oneida Election Board

Motion by Lisa Liggins to accept the Oneida Election Board FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

2. Accept the Oneida Gaming Commission FY-2026 3rd quarter report (00:15:36)

Sponsor: Mark Powless Sr., Chair/Oneida Gaming Commission

Motion by Kirby Metoxen to accept the Oneida Gaming Commission FY-2026 3rd quarter report, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**3. Accept the Oneida Land Claims Commission FY-2026 3rd quarter report (00:15:56)**

Sponsor: Chris Cornelius, Chair/Oneida Land Claims Commission

Motion by Lawrence Barton to accept the Oneida Land Claims Commission FY-2026 3rd quarter report, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

4. Accept the Oneida Land Commission FY-2026 3rd quarter report (00:16:17)

Sponsor: Sidney White, Chair/Oneida Land Commission

Motion by Jennifer Webster to accept the Oneida Land Commission FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

5. Accept the Oneida Nation Commission on Aging FY-2026 3rd quarter report (00:16:41)

Sponsor: Winnifred Thomas, Chair/Oneida Nation Commission on Aging

Motion by Jennifer Webster to accept the Oneida Nation Commission on Aging FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

6. Accept the Oneida Nation School Board FY-2026 3rd quarter report (00:17:07)

Sponsor: Cary Waubanasum Hawpetoss, Chair/Oneida Nation School Board

Motion by Jennifer Webster to accept the Oneida Nation School Board FY-2026 3rd quarter report, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

7. Accept the Oneida Trust Enrollment Committee FY-2026 3rd quarter report (00:17:36)

Sponsor: Teresa Schuman, Chair/Oneida Trust Enrollment Committee

Motion by Kirby Metoxen to accept the Oneida Trust Enrollment Committee FY-2026 3rd quarter report, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**C. STANDING COMMITTEES****1. Accept the Finance Committee FY-2026 3rd quarter report (00:17:59)**

Sponsor: Lawrence Barton, Treasurer

Motion by Kirby Metoxen to accept the Finance Committee FY-2026 3rd quarter report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

2. Accept the Legislative Operating Committee FY-2026 3rd quarter report (00:18:17)

Sponsor: Jameson Wilson, Councilman

Motion by Jennifer Webster to accept the Legislative Operating Committee FY-2026 3rd quarter report, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

3. Accept the On?yote?a?ká ni? i Standing Committee FY-2026 3rd quarter report (00:18:36)

Sponsor: Taryn Webster, Chair/ On?yote?a?ká ni? i Standing Standing Committee

Motion by Jennifer Webster to accept the On?yote?a?ká ni? i Standing Committee FY-2026 3rd quarter report, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

Item V.A. was addressed next.

XII. GENERAL TRIBAL COUNCIL**A. PETITIONER GINA POWLESS-BUENROSTRO - PETITION # 2026-01****1. Accept the statement of effect regarding - Amend Judiciary Law -petition # 2026-01 (01:18:04)**

Sponsor: Jameson Wilson, Councilman

Motion by Lisa Liggins to accept the statement of effect regarding - Amend Judiciary Law -petition # 2026-01, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**2. Accept the legal review regarding - Amend Judiciary Law - petition # 2026-01 (01:18:32)**

Sponsor: Jo Anne House, Chief Counsel

Motion by Jennifer Webster to accept the legal review regarding - Amend Judiciary Law - petition # 2026-01, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

3. Accept the fiscal impact statement regarding - Amend Judiciary Law - petition # 2026-01 (01:18:55)

Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer

Motion by Jennifer Webster to accept the fiscal impact statement regarding - Amend Judiciary Law - petition # 2026-01, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

XIII. EXECUTIVE SESSION (01:19:19)**A. REPORTS****1. Accept the CEO-Nation Services report (01:19:25)**

Sponsor: Mark W. Powless, CEO-Nation Services

Motion by Lisa Liggins to accept the CEO-Nation Services report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

2. Accept the Treasurer's June 2026 report (01:19:49)

Sponsor: Lawrence Barton, Treasurer

Motion by Lisa Liggins to accept the Treasurer's June 2026 report, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

B. AUDIT COMMITTEE**1. Accept the June 22, 2026, regular Audit Committee meeting minutes (01:20:01)**

Sponsor: Lisa Liggins, Secretary

Motion by Jennifer Webster to accept the June 22, 2026, regular Audit Committee meeting minutes, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**2. Accept the Audit Committee FY-2026 3rd quarter report (01:20:15)**

Sponsor: Lisa Liggins, Secretary

Motion by Kirby Metoxen to accept the Audit Committee FY-2026 3rd quarter report, seconded by Jennifer Webster. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

3. Accept the Roulette Rules of Play compliance audit and lift the confidentiality requirement (01:20:30)

Sponsor: Lisa Liggins, Secretary

Motion by Jennifer Webster to accept the Roulette Rules of Play compliance audit and lift the confidentiality requirement, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

C. NEW BUSINESS**1. Approve the 2017-2021 Multi-Year Funding Agreement between the Oneida Nation and the U.S. Department of Interior #11 - file # 2026-0760 (01:20:47)**

Sponsor: Melinda J. Danforth, Intergovernmental Affairs Director

Motion by Jennifer Webster to approve the 2017-2021 Multi-Year Funding Agreement between the Oneida Nation and the U.S. Department of Interior #11 - file # 2026-0760, seconded by Lisa Liggins. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

2. Approve the attorney contract - Legislative Reference Office - file # 2022-0389 (01:21:07)

Sponsor: Jameson Wilson, Councilman

Motion by Lawrence Barton to approve the attorney contract - Legislative Reference Office - file # 2022-0389, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

3. Accept the Personnel Commission Screening/Interview Transition report in accordance with BC Resolution # 07-08-26-G (01:21:22)

Sponsor: Laura Laitinen-Warren, CEO-Human Resources

Motion by Jennifer Webster to accept the Personnel Commission Screening/Interview Transition report in accordance with BC Resolution # 07-08-26-G, seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT**4. Accept the 3rd quarter Tribal Contributions Savings Projects report as information (01:21:46)**

Sponsor: Lisa Liggins, Secretary

Motion by Lisa Liggins to accept the 3rd quarter Tribal Contributions Savings Projects reports as information and direct the Chief Financial Officer and Chief Counsel to develop a final closure recommendation based on the discussion for the remaining Tribal Contribution Savings Projects for the August 25, 2026, executive session discussion, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

5. Review the consolidated report on balances & budget plans for Tribal Contributions Savings Projects and determine next steps (01:22:18)

Sponsor: Lisa Liggins, Secretary

Motion by Lisa Liggins to accept the discussion on the consolidated report on balances & budget plans for the Tribal Contributions Savings Projects in accordance with BC resolution # 03-11-26-A, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

6. Determine next steps regarding the 2026 Statewide Mobile Sports Betting Negotiations points (01:22:52)

Sponsor: Melinda J. Danforth, Legislative Affairs Director

Motion by Lisa Liggins to accept the discussion on Statewide Mobile Sports Betting Negotiations strategy as information, seconded by Lawrence Barton. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

7. Approve limited waiver of sovereign immunity -University of Wisconsin Green Bay Athletics Department & Sponsorship Agreement - file # 2026-0597 (01:23:15)

Sponsor: Tehassi Hill, Chairman

Motion by Lawrence Barton to approve limited waiver of sovereign immunity -University of Wisconsin Green Bay Athletics Department & Sponsorship Agreement - file # 2026-0597 with contract subject to further review by the Business Committee and to send the discussion regarding implementation and communication to the October 1, 2026, BC Work Session to include the Government Administration Office and Intergovernmental Affairs, seconded by Jameson Wilson. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

DRAFT

XIV. ADJOURN (01:24:19)

Motion by Jameson Wilson to adjourn at 9:54 a.m., seconded by Kirby Metoxen. Motion carried:

Ayes: Lawrence Barton, Lisa Liggins, Kirby Metoxen, Jennifer Webster,
Jameson Wilson

Not Present: Jonas Hill

Minutes prepared by Bonnie Pigman, Information Management Specialist.
Minutes approved as presented on _____.

Lisa Liggins, Secretary
ONEIDA BUSINESS COMMITTEE

Adopt resolution entitled Resolution to Terminate Oneida Nation Deferred Compensation Plan

Business Committee Agenda Request

1. Meeting Date Requested: 8/26/26

2. Session:

☒

Open

☐

Executive – must qualify under §107.4-1.

Justification: Choose or type justification

3. Requested Motion:

☐

Accept as information; OR

Approve Resolution to Terminate Oneida Nation Deferred Compensation Plan and Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan.

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☐

Gaming/Retail

☐

Boards, Committees, or Commissions

☐

Other:

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☒ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☒ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: Describe | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☐ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer

Primary Requestor: RaLinda Ninham-Lamberies, Chief Financial Officer

Instructions:

- 1) Save a copy of this form for your records.
- 2) Print this form as a *.pdf OR print and scan this form in as *.pdf.
- 3) Attach a memo addressed to the Business Committee describing your request
- 4) E-mail this form and all supporting materials in a *.pdf file(s) to:
BC_Agenda_Requests@oneidanation.org
- 5) If you are submitting a resolution for adoption, please send the **Word** version of the resolution along with the Agenda Request file.
- 6) Please email BC_Agenda_Requests@oneidanation.org with any questions regarding this form.

FINANCE ADMINISTRATION



MEMORANDUM

TO: Oneida Business Committee
FROM: RaLinda Ninham-Lamberies, Chief Financial Officer
DATE: August 18, 2026
RE: Resolution to Terminate Oneida Nation Deferred Compensation Plan and the
Oneida Nation Elected Business Committee Deferred Compensation Plan

This memorandum requests approval of the termination of the Oneida Nation Deferred Compensation Plan and the Oneida Nation Elected Business Committee Deferred Compensation Plan. The Nation has determined that it is in its best interest to terminate both Plans and that all requirements and conditions necessary for termination have been satisfied. Accordingly, the attached resolutions and corresponding Statements of Effect (SOEs) are submitted for Business Committee consideration and approval.



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Resolution to Terminate Oneida Nation Deferred Compensation Plan

Summary

This resolution terminates the Oneida Nation Deferred Compensation Plan effective September 1, 2026, and authorizes the execution of a Termination Amendment to the Plan. The resolution also documents the Oneida Business Committee's findings that all conditions required for Plan termination under Section 14.2 of the Plan and applicable federal regulations have been satisfied.

Submitted by: Grace L. Elliott, Staff Attorney, Legislative Reference Office

Date: August 10, 2026

Analysis by the Legislative Reference Office

The Oneida Business Committee previously established the Oneida Nation Deferred Compensation Plan through Resolution 12-14-18-C as a non-qualified deferred compensation plan for the benefit of a select group of management and highly compensated employees. The Plan provides the Nation with the authority to terminate the Plan pursuant to Section 14.2, provided specified conditions are met.

This resolution determines that it is in the best interests of the Nation to terminate the Oneida Nation Deferred Compensation Plan effective September 1, 2026, and authorizes the Chairman to execute the associated Termination Amendment as soon as administratively feasible.

In accordance with Section 14.2 of the Plan, the Oneida Business Committee finds that the termination is not occurring proximate to a downturn in the Nation's financial health. The resolution further provides that the Nation's only other non-qualified deferred compensation arrangement of the same type, the Oneida Nation Elected Business Committee Deferred Compensation Plan, is being terminated as of the same effective date.

The resolution further confirms that termination of the Plan will not result in any payments being made during the twelve months following termination other than payments that otherwise would have been payable under the Plan, that all Plan benefits owed will be distributed within twenty-four months of the termination date, and that the Nation will not establish a new deferred compensation arrangement of the same type that would be aggregated with the Plan under Treasury Regulation §1.409A-1(c) within three years following termination. The resolution authorizes and directs the Chief Financial Officer to ensure any benefits owed under the Plan are paid within the required timeframe.

Conclusion

Adoption of this resolution would not conflict with any of the Nation's laws.

Oneida Nation

Post Office Box 365

Phone: (920)869-2214



Oneida, WI 54155

BC Resolution # _____
Resolution to Terminate Oneida Nation Deferred Compensation Plan

WHEREAS, the Oneida Nation is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States of America; and

WHEREAS, the Oneida General Tribal Council is the governing body of the Oneida Nation; and

WHEREAS, the Oneida Business Committee has been delegated the authority of Article IV, Section 1, of the Oneida Tribal Constitution by the Oneida General Tribal Council; and

WHEREAS, the Oneida Business Committee, through Resolution 12-14-18-C, established the Oneida Nation Deferred Compensation Plan as a qualified Non-Qualified Deferred Compensation Plan (the "Plan") for the benefit of a select group of management and highly compensated employees, and

WHEREAS, under Section 14.2 of the Plan, the Nation has retained the right to terminate the Plan provided certain conditions described below are met;

WHEREAS, the Nation, acting by and through the Oneida Business Committee, has determined that it is in the best interests of Nation to terminate the Plan and that the requisite conditions to terminate the plan, as described below have been met; and

NOW, THEREFORE, BE IT RESOLVED, the Plan is hereby amended to reflect that the Plan has been terminated by the Nation as of September 1, 2026 (hereinafter referred to as the "Termination Date") and the Oneida Business Committee hereby authorizes, approves and directs the Chairman to execute the Termination Amendment to the Plan, attached hereto, as soon as administratively feasible.

BC Resolution # _____
Resolution to Terminate Oneida Nation Deferred Compensation Plan
Page 2 of 2

BE IT FURTHER RESOLVED, that in accordance with Section 14.2 of the Plan, the Oneida Business Committee has determined that:

1. The termination of the Plan has not occurred proximate to a downturn in the financial health of the Nation.
2. The only other non-qualified deferred compensation arrangements sponsored by the Nation of the same type, the Oneida Nation Elected Business Committee Deferred Compensation Plan, is also being terminated with respect to all participants of that plan as of the Termination Date.
3. As of the Termination Date no further payments will be made within twelve (12) months of the Plan termination (other than those payments, if any, that would have been paid under the Plan absent the termination).
4. All benefits owed under the Plan, if any, will be paid within twenty-four (24) months of the Termination Date and the Chief Financial Officer is authorized and directed to pay all benefits owed under the Plan within such timeframe.
5. The Nation will not adopt a new deferred compensation arrangement of the same type that would be aggregated with the Plan under Section 1.409A-1(c) of the Treasury Regulations at any time within three years following the Termination Date.

Adopt resolution entitled Resolution to Terminate Oneida Nation Elected Business Committee Deferred...

Business Committee Agenda Request

1. Meeting Date Requested: 8/26/26

2. Session:

☒

Open

☐

Executive – must qualify under §107.4-1.

Justification: Choose or type justification

3. Requested Motion:

☐

Accept as information; OR

Approve Resolution to Terminate Oneida Nation Deferred Compensation Plan and Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan.

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☐

Gaming/Retail

☐

Boards, Committees, or Commissions

☐

Other:

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☒ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☒ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: Describe | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☐ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: RaLinda Ninham-Lamberies, Chief Financial Officer

Primary Requestor: RaLinda Ninham-Lamberies, Chief Financial Officer

Instructions:

- 1) Save a copy of this form for your records.
- 2) Print this form as a *.pdf OR print and scan this form in as *.pdf.
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BC_Agenda_Requests@oneidanation.org
- 5) If you are submitting a resolution for adoption, please send the **Word** version of the resolution along with the Agenda Request file.
- 6) Please email BC_Agenda_Requests@oneidanation.org with any questions regarding this form.

FINANCE ADMINISTRATION



MEMORANDUM

TO: Oneida Business Committee
FROM: RaLinda Ninham-Lamberies, Chief Financial Officer
DATE: August 18, 2026
RE: Resolution to Terminate Oneida Nation Deferred Compensation Plan and the Oneida Nation Elected Business Committee Deferred Compensation Plan

This memorandum requests approval of the termination of the Oneida Nation Deferred Compensation Plan and the Oneida Nation Elected Business Committee Deferred Compensation Plan. The Nation has determined that it is in its best interest to terminate both Plans and that all requirements and conditions necessary for termination have been satisfied. Accordingly, the attached resolutions and corresponding Statements of Effect (SOEs) are submitted for Business Committee consideration and approval.



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan

Summary

This resolution terminates the Oneida Nation Elected Business Committee Deferred Compensation Plan effective September 1, 2026, and authorizes the execution of a Termination Amendment to the Plan. The resolution also documents the Oneida Business Committee's findings that all conditions required for Plan termination under Section 13.2 of the Plan and applicable federal regulations have been satisfied.

Submitted by: Grace L. Elliott, Staff Attorney, Legislative Reference Office

Date: August 10, 2026

Analysis by the Legislative Reference Office

The Oneida Business Committee previously established the Oneida Nation Elected Business Committee Deferred Compensation Plan through Resolution 12-14-18-B as a non-qualified deferred compensation plan for the benefit of a select group of management and highly compensated employees. The Plan provides the Nation with the authority to terminate the Plan pursuant to Section 13.2, provided specified conditions are met.

This resolution determines that it is in the best interests of the Nation to terminate the Oneida Nation Elected Business Committee Deferred Compensation Plan effective September 1, 2026, and authorizes and approves the execution of the associated Termination Amendment as soon as administratively feasible.

In accordance with Section 13.2 of the Plan, the Oneida Business Committee finds that the termination is not occurring proximate to a downturn in the Nation's financial health. The resolution further provides that the Nation's only other non-qualified deferred compensation arrangement of the same type, the Oneida Nation Deferred Compensation Plan, is being terminated with respect to all participants as of the same termination date.

The resolution further confirms that termination of the Plan will not result in any payments being made during the twelve months following termination other than payments that otherwise would have been payable under the Plan, that all benefits owed under the Plan will be distributed within twenty-four months of the termination date, and that the Nation will not establish a new deferred compensation arrangement of the same type that would be aggregated with the Plan under Treasury Regulation § 1.409A-1(c) within three years following the termination date. The resolution further authorizes and directs the Chief Financial Officer to ensure that all benefits owed under the Plan are paid within the required timeframe.

Conclusion

Adoption of this resolution would not conflict with any of the Nation's laws.

Oneida Nation

Post Office Box 365

Phone: (920)869-2214



Oneida, WI 54155

BC Resolution # _____

Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan

WHEREAS, the Oneida Nation is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States of America; and

WHEREAS, the Oneida General Tribal Council is the governing body of the Oneida Nation; and

WHEREAS, the Oneida Business Committee has been delegated the authority of Article IV, Section 1, of the Oneida Tribal Constitution by the Oneida General Tribal Council; and

WHEREAS, the Oneida Business Committee, through Resolution 12-14-18-B, established the Oneida Nation Elected Business Committee Deferred Compensation Plan as a qualified Non-Qualified Deferred Compensation Plan (the "Plan") for the benefit of a select group of management and highly compensated employees, and

WHEREAS, under Section 13.2 of the Plan, the Nation has retained the right to terminate the Plan provided certain conditions described below are met; and

WHEREAS, the Nation, acting by and through the Oneida Business Committee, has determined that it is in the best interests of Nation to terminate the Plan and that the requisite conditions to terminate the plan, as described below have been met; and

NOW, THEREFORE, BE IT RESOLVED, the Plan is hereby amended to reflect that the Plan has been terminated by the Nation as of September 1, 2026 (hereinafter referred to as the "Termination Date") and the Oneida Business Committee hereby authorizes, approves and directs the Termination Amendment to the Plan, attached hereto, as soon as administratively feasible.

BC Resolution # _____

Resolution to Terminate Oneida Nation Elected Business Committee Deferred Compensation Plan
Page 2 of 2

BE IT FURTHER RESOLVED, that in accordance with Section 13.2 of the Plan, the Oneida Business Committee has determined that:

1. The termination of the Plan has not occurred proximate to a downturn in the financial health of the Nation.
2. The only other non-qualified deferred compensation arrangements sponsored by the Nation of the same type, Oneida Nation Deferred Compensation Plan, is also being terminated with respect to all participants of that plan as of the Termination Date.
3. As of the Termination Date no further payments will be made within twelve (12) months of the Plan termination (other than those payments, if any, that would have been paid under the Plan absent the termination).
4. All benefits owed under the Plan, if any, will be paid within twenty-four (24) months of the Termination Date and the Chief Financial Officer is authorized and directed to pay all benefits owed under the Plan within such timeframe.
5. The Nation will not adopt a new deferred compensation arrangement of the same type that would be aggregated with the Plan under Section 1.409A-1(c) of the Treasury Regulations at any time within three years following the Termination Date.

Determine next steps regarding one (1) vacancy - Anna John Resident Centered Care Community Board

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.
Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☒ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☐ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☒ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Lisa Liggins, Secretary

Primary Requestor: Amber Van Kirk, Administrative Assistant

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: AVANKIRK



Memorandum

TO: Oneida Business Committee

FROM: Brooke Doxtator, Governance Support & Information Manager 

DATE: August 11, 2026

RE: Appointment(s) – Anna John Resident Centered Care Community Board

Background

One (1) vacancy was posted for the Anna John Resident Centered Care Community Board. The vacancy is to complete a term ending July 31, 2030.

The vacancy has been posted since June 2026. The latest application deadline was August 07, 2026, and one (1) application(s) was received for the following applicant(s):

- Valerie Groleau

Select action(s) provided below:

- 1) accept the selected the applicant(s) and appoint to a term ending July 31, 2030, OR
- 2) reject the selected applicant(s) and oppose the vote**; OR
- 3) request the Secretary to re-notice the vacancy(ies)

Determine next steps regarding two (2) vacancies - Bay Bancorporation Board of Directors

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☒ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☐ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☒ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Lisa Liggins, Secretary

Primary Requestor: Amber Van Kirk, Administrative Assistant

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: AVANKIRK



Memorandum

TO: Oneida Business Committee

FROM: Brooke Doxtator, Governance Support & Information Manager 

DATE: August 18, 2026

RE: Appointment(s) – Bay Bancorporation Board of Directors

Background

Two (2) vacancies are posted for the Bay Bancorporation Board of Directors. The vacancies are to complete a term ending June 30, 2029.

The vacancy has been posted since May 2026. The latest application deadline was August 7, 2026, and two (2) application(s) were received for the following applicant(s):

- Samuel McMahon
- Jeff Bowman

Select action(s) provided below:

- 1) accept the selected the applicant(s) and appoint to a term ending June 30, 2029 OR
- 2) reject the selected applicant(s) and oppose the vote**, OR
- 3) request the Secretary to re-notice the vacancy(ies)

Determine next steps regarding six (6) vacancies - Oneida Election Board - Ad Hoc Committee

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.
Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☒ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☐ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☒ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Lisa Liggins, Secretary

Primary Requestor: Amber Van Kirk, Administrative Assistant

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: AVANKIRK



Memorandum

TO: Oneida Business Committee

FROM: Brooke Doxtator, Governance Support & Information Manager 

DATE: August 18, 2026

RE: Appointment(s) – Oneida Election Board - Ad Hoc Committee

Background

Six (6) vacancies were posted for the Oneida Election Board - Ad Hoc Committee. The vacancies are to complete terms ending December 31, 2026.

The vacancies have been posted since October 2025. The latest application deadline was August 7, 2026, and one (1) application(s) was received for the following applicant(s):

- Kalene White

Select action(s) provided below:

- 1) accept the selected the applicant(s) and appoint to a term ending December 31, 2026, OR
- 2) reject the selected applicant(s) and oppose the vote**; OR
- 3) request the Secretary to re-notice the vacancy(ies)

Accept the July 23, 2026, regular Finance Committee meeting minutes

Business Committee Agenda Request

1. Meeting Date Requested: 08/12/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: *Choose or type justification.*

3. Requested Motion:

☒ Accept as information; OR

Accept the FC Minutes for 7/23/26 & E-Poll

4. Areas potentially impacted or affected by this request:

☒ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☒ Boards, Committees, or Commissions

☒ Other: All areas that require FC
approval

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☒ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☒ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Larry Barton, Treasurer

Primary Requestor: Ashley Blaker, Office Manager



INTERNAL MEMORANDUM

TO: FINANCE COMMITTEE
FROM: ASHLEY BLAKER, OFFICE MANAGER
SUBJECT: E-POLL RESULTS – FC MINUTES OF JULY 23, 2026
DATE: 7/23/26

An E-Poll vote of the Finance Committee was conducted to approve the Finance Committee meeting minutes of July 23, 2026. The E-Poll and minutes were sent out today and concluded today. The results of the completed E-Poll are as follows:

E-POLL RESULTS:

There was a Majority of 4 FC members voting to approve the July 23, 2026, Finance Committee Meeting Minutes. FC Members voting included: *Lisa Liggins, Jennifer Webster, RaLinda Ninham-Lamberies, and Chad Fuss.*

These Finance Committee Minutes of July 23, 2026, will be placed on the next Finance Committee agenda to acknowledge this E-Poll action. Per the FC By-Laws all Minutes of the FC will be submitted to the Secretary's Office once a month for BC acceptance.



FINANCE COMMITTEE
FC REGULAR MEETING
JULY 23, 2026 • Time: 8:30 A.M
Business Committee Conference Room

REGULAR MEETING MINUTES

FC MEMBERS PRESENT:

Larry Barton, BC Treasurer/FC Chair
Lisa Liggins, BC Secretary
Sarah White, Purchasing Director
Jonas Hill, BC Council Member

RaLinda Ninham-Lamberies CFO/FC Vice-Chair
Jennifer Webster, BC Council Member
Chad Fuss, Asst. GGM-Finance Casino Hotel

OTHERS PRESENT: Vanessa Miller, Eric McLester, John Nicholas, Sharon Mousseau, Linda Jenkins, Lauren Hartman, Eric Bristol, Dana McLester, Tennille Fillipelli, Wanda Diemel, Destiny Prendiville, Jamie Metoxen, David Emerson, Wenona Wolter, Paula Jolly, Judy Skenandore, Emily Burgess, David Jordan, and Ashley Blaker taking notes.

I. CALL TO ORDER: The FC Regular Meeting was called to order by the FC Chair at 8:27 A.M.

II. APPROVAL OF AGENDA: JULY 23, 2026

Motion by RaLinda Ninham-Lamberies to approve the July 23, 2026, Finance Committee Meeting Agenda noting the six add-ons, one under Capital Expenditures #2, four under New Business #10, #11, #12, #13, one under Admin/Internal #1, and one deletion under Donation Requests #1. Seconded by Jennifer Webster. Motion carried unanimously.

III. FC MINUTES: JULY 9, 2026 (Approved via E-Poll on 7/9/26)

Motion by Jennifer Webster to acknowledge the FC E-Poll action taken on July 9, 2026, approving the July 9, 2026, Finance Committee Meeting Minutes. Seconded by Sarah White. Motion carried unanimously.

IV. CAPITAL EXPENDITURES:

1. O'Mara Ag Services, Inc. – Tote Box Dryer for Cannery Amount: \$119,094.00
Vanessa Miller, Food & Agriculture

Motion by Jennifer Webster to approve O'Mara Ag Services, Inc. – Tote Box Dryer for Cannery in the amount of \$119,094.00 noting that the invoice needs to be updated for Oneida Nation. Seconded by Jonas Hill. Motion carried unanimously.

2. **ADD-ON:** Crane Engineering – Lift Station Pump Replacements Amount: \$82,122.39
John Nicholas, DPW – Utilities

Motion by Jonas Hill to approve Crane Engineering – Lift Station Pump Replacements in the amount of \$82,122.39. Seconded by Jennifer Webster. Motion carried unanimously.

V. NEW BUSINESS:

1. FY27 Blkt PO – WE Energies Amount: \$300,000.00
Sharon Mousseau, ONSS

Motion by Sarah White to approve FY27 Blkt PO – WE Energies in the amount of \$300,000.00. Seconded by Jennifer Webster. Motion carried unanimously.

2. FY27 Blkt PO – New Directions Solutions – Special Ed Teachers Amount: \$494,109.00
Sharon Mousseau, ONSS

Motion by Jonas Hill to approve FY27 Blkt PO – New Directions Solutions – Special Ed Teachers in the amount of \$494,109.00. Seconded by Chad Fuss. Motion carried unanimously.

3. FY27 Blkt PO – New Directions Solutions- Special Ed Co-Teachers Amount: \$247,724.00
Sharon Mousseau, ONSS

Motion by RaLinda Ninham-Lamberies to approve FY27 Blkt PO – New Directions Solutions – Special Ed Co-Teachers in the amount of \$247,724.00. Seconded by Jennifer Webster. Motion carried unanimously.

4. FY27 Blkt PO – Lamers Bus Lines Inc. Amount: \$500,000.00
Sharon Mousseau, ONSS

Motion by RaLinda Ninham-Lamberies to approve FY27 Blkt PO – Lamers Bus Lines Inc. in the amount of \$500,000.00. Seconded by Lisa Liggins. Motion carried unanimously.

5. FY27 Blkt PO – Houghton Mifflin Co. – School Curriculum – Year 1 of 6 Amount: \$87,826.00
Sharon Mousseau, ONSS

Deferred until Purchasing can review the request due to the total contract amount is \$526,953.16 for all six years with a discount. ONSS will receive a year free if they pay for all six years. Request can be E-Polled after Purchasing's review of the request.

6. FY27 Blkt PO – CESA 7 – Learning & School Psychologist Services Amount: \$128,016.71
Sharon Mousseau, ONSS

Motion by Jennifer Webster to approve FY27 Blkt PO – CESA 7 – Learning & School Psychologist Services in the amount of \$128,016.71. Seconded by Lisa Liggins. Motion carried unanimously.

7. Outagamie County – FY26 Annual Gov. Agreement – Year 5 of 5 Amount: \$149,850.00
Melinda Danforth, Legislative Affairs

Motion by Lisa Liggins to approve items #7 & #8 in the requested amounts. Seconded by Jennifer Webster. Motion carried unanimously.

8. Brown County – FY26 Annual Service Agreement – Year 3 of 15 Amount: \$683,386.51
Melinda Danforth, Legislative Affairs

- See Action in New Business #7.

9. FY25 Blkt PO Increase – Steiro Appraisal Service Amount: \$20,000.00
Lauren Hartman, Land Management Total PO: \$208,000.00

Motion by Jennifer Webster to approve FY25 Blkt PO – Steiro Appraisal Service in the amount of \$20,000.00. Seconded by RaLinda Ninham-Lamberies. Motion carried unanimously.

10. **ADD-ON:** Everi Payments – Annual Maintenance & Licenses Amount: \$105,656.87
Eric Bristol, Gaming – DTS

Motion by Jennifer Webster to approve Everi Payments – Annual Maintenance & Licenses in the amount of \$105,656.87. Seconded by Sarah White. Motion carried unanimously.

11. **ADD-ON:** FY26 Blkt PO Increase – Charter Communications Amount: \$20,000.00
Dana McLester, CHD Total PO: \$65,000.00

Motion by Sarah White to approve FY26 Blkt PO Increase – Charter Communications in the amount of \$20,000.00. Seconded by Lisa Liggins. Motion carried unanimously.

12. **ADD-ON:** FY26 Blkt PO Increase – ZipRecruiter, Inc. Amount: \$15,000.00
Tennille Fillipelli, HRD Total PO: \$75,000.00

Motion by Jonas Hill to approve FY26 Blkt PO Increase – ZipRecruiter, Inc. in the amount of \$15,000.00. Seconded by RaLinda Ninham-Lamberies. Motion carried unanimously.

13. **ADD-ON:** FY27 Blkt PO – IGT Customer Agreement Amount: \$1,200,000.00
Jessalyn Harvath, Gaming – Sport Betting

Motion by Sarah White to approve FY27 Blkt PO – IGT Customer Agreement in the amount of \$1,200,000.00. Seconded by Jennifer Webster. Motion carried unanimously.

VI. DONATION:

REPORT:

1. FC Donation Report – July 2026
Ashley Blaker, Office Manager

Motion by Jennifer Webster to accept the FC Donation Report for July 2026. Seconded by Jonas Hill. Motion carried unanimously.

REQUEST(S):

1. Visionary Ventures NFP Corp. – Donation Amount: \$3,000.00
Requester: Shelly Tucciarelli, Executive Director

Deleted from the Agenda.

2. The Megan Kelley Foundation – Donation
Requester: Bev Kelley-Miller, President

Amount: \$3,000.00

Motion by RaLinda Ninham-Lamberies to approve from the Finance Committee Donations the request from The Megan Kelley Foundation – Donation in the amount of \$3,000. Seconded by Jennifer Webster. Motion carried unanimously.

3. Holy Apostles Church – Donation
Requester: Judy Skenandore, President Treasurer

Amount: \$3,000.00

Motion by Lisa Liggins to approve from the Finance Committee Donations the request from Holy Apostles Church – Donation in the amount of \$3,000. Seconded by RaLinda Ninham-Lamberies. Motion carried unanimously.

4. Big Brothers Big Sisters of Northeast WI – Sponsorship
Requester: Emily Burgess, Director of Philanthropy

Amount: \$3,000.00

Motion by Jonas Hill to approve from the Finance Committee Donations the request from Big Brothers Big Sisters of Northeast WI – Sponsorship in the amount of \$3,000. Seconded by Jennifer Webster. Motion carried unanimously.

VII. EXECUTIVE SESSION:

Motion by Jennifer Webster to go into Executive Session. Seconded by Lisa Liggins. Motion carried unanimously. Time: 8:49 A.M.

Motion by Jennifer Webster to come out of Executive Session. Seconded by Chad Fuss. Motion carried unanimously. Time: 8:50 A.M.

1. Consolidated Health – FY26 Blkt PO Increase – MD Contract #2026-0062
Lesley Ness, Comp. Health

Motion by Jennifer Webster to approve Consolidated Health – FY26 Blkt PO Increase – MD Contract #2026-0062 in the amount requested. Seconded by Chad Fuss. Motion carried unanimously.

VIII. ADMINISTRATIVE /INTERNAL:

1. **ADD-ON:** Finance Committee – FY26 3rd Quarter Report to the BC
Ashley Blaker, Office Manager

Motion by Jennifer Webster to approve the Finance Committee – FY26 3rd Quarter Report to the BC. Seconded by Chad Fuss. Motion carried unanimously.

IX. FOLLOW UP: None**X. FOR INFORMATION ONLY:**

1. FY26 Blkt PO Increase – IGT Replacement Parts
David Emerson, Gaming – Slots

Motion by Jennifer Webster to accept as information only items #1 and #2 under For Information Only. Seconded by Chad Fuss. Motion carried unanimously.

2. FY26 Blkt PO Increase – Patriot Replacement Parts
David Emerson, Gaming – Slots

- See Action in For Information Only #1.

XI. ADJOURN: Motion by Jennifer Webster to adjourn. Seconded by Lisa Liggins. Motion carried unanimously. Time: 8:53 A.M.

Minutes submitted by:
Ashley Blaker, Office Manager
& Finance Committee Contact/Recording Secretary

Finance Committee Approval Date of Minutes via E-Poll: July 23, 2026

Accept the August 5, 2026 Legislative Operating Committee meeting minutes

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☒ Accept as information; OR

Accept the August 5, 2026 Legislative Operating Committee meeting minutes.

4. Areas potentially impacted or affected by this request:

☐ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☐ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☒ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



LEGISLATIVE OPERATING COMMITTEE MEETING MINUTES
Oneida Business Committee Conference Room-2nd Floor Norbert Hill Center
August 5, 2026
9:00 a.m.

Present: Jameson Wilson, Jonas Hill, Kirby Metoxen, Jennifer Webster

Others Present: Clorissa Leeman, Grace Elliott, Carolyn Salutz

Others Present on Microsoft Teams: Ashley Blaker, Rhiannon Metoxen, Fawn Cottrell, Melissa Alvarado, Rae Skenandore, Kaylynn Biely, Kristal Hill, Fawn Billie, Thurston Denny, Lora Danforth, Michelle Braaten, Jada Lassila, Peggy Helm-Quest, Derrick King, Isaiah Skenandore, Kristin Jorgenson-Dann, Quailen Thao, Taryn Webster, Sidney White, Valerie Webster, Tina Jorgenson, Lorna Skenandore, Michelle Tipple, Justin Nishimoto, David Jordan

I. Call to Order and Approval of the Agenda

Jameson Wilson called the August 5, 2026, Legislative Operating Committee meeting to order at 9:00 a.m.

Motion by Jennifer Webster to adopt the agenda; seconded by Jonas Hill. Motion carried unanimously.

II. Minutes to be Approved

1. July 15, 2026 LOC Meeting Minutes.

Motion by Jennifer Webster to approve the July 15, 2026, LOC meeting minutes and forward to the Oneida Business Committee; seconded by Kirby Metoxen. Motion carried unanimously.

III. Current Business

1. Safe Neighborhoods Law.

Motion by Jennifer Webster to approve the public meeting packet for the proposed Safe Neighborhoods law and forward the Safe Neighborhoods law to a public meeting to be held on September 10, 2026; seconded by Kirby Metoxen. Motion carried unanimously.

Motion by Kirby Metoxen to approve the emergency adoption extension packet for the Safe Neighborhoods law and forward to the Oneida Business Committee for consideration; seconded by Jennifer Webster. Motion carried unanimously.



2. Petition: G. Powless-Buenrostro – Amend the Judiciary Law #2026-01.

Motion by Jennifer Websyer to approve the updated public comment review memorandum, draft, and legislative analysis for the proposed amendments to the Boards, Committees, and Commissions law; seconded by Jonas Hill. Kirby Metoxen opposed Motion carried.

3. Boards, Committees, and Commissions Law Amendments.

Motion by Jonas Hill to approve the adoption packet for the Boards, Committees, and Commissions Law Amendments and forward to the Oneida Business Committee for consideration; seconded by Jennifer Webster. Motion carried unanimously.

4. Code of Ethics Amendments.

Motion by Jennifer Webster to approve the adoption packet for the proposed amendments to the Code of Ethics and forward to the Oneida Business Committee for consideration; seconded by Jonas Hill. Motion carried unanimously.

IV. New Submissions**V. Additions****VI. Administrative Updates****1. Legislative Operating Committee Fiscal Year 2026 Third Quarter Report.**

Motion by Jennifer Webster to approve the LOC Fiscal Year 2026 Third Quarter Report and forward to the Oneida Business Committee; seconded by Kirby Metoxen. Motion carried unanimously.

VII. Executive Session**VIII. Adjourn**

Motion by Jennifer Webster to adjourn at 9:41 a.m.; seconded by Kirby Metoxen. Motion carried unanimously.

Accept the Legislative Operating Committee 2023-2026 End of Term report

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☒ Accept as information; OR

Accept the Legislative Operating Committee 2023-2026 End of Term Report.

4. Areas potentially impacted or affected by this request:

☐ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☐ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney



Oneida Nation
 Oneida Business Committee
 Legislative Operating Committee
 PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



TO: Oneida Business Committee
 FROM: Jameson Wilson, LOC Chairperson
 DATE: August 19, 2026
 RE: 2023-2026 Legislative Operating Committee End of Term Report

The Legislative Operating Committee is the legislative body of the Oneida Nation and is comprised of the five (5) non-officer members of the Oneida Business Committee. During the 2023-2026 legislative term the Legislative Operating Committee was comprised of the following members:

- Jameson Wilson, LOC Chairman;
- Kirby Metoxen, LOC Vice-Chairman;
- Jennifer Webster;
- Jonas Hill; and
- Marlon Skenandore.¹

This report details the Legislative Operating Committee's accomplishments during the 2023-2026 legislative term and is based on information from the Legislative Operating Committee's Active Files List ("AFL"), which is used to track the work of the Legislative Operating Committee.

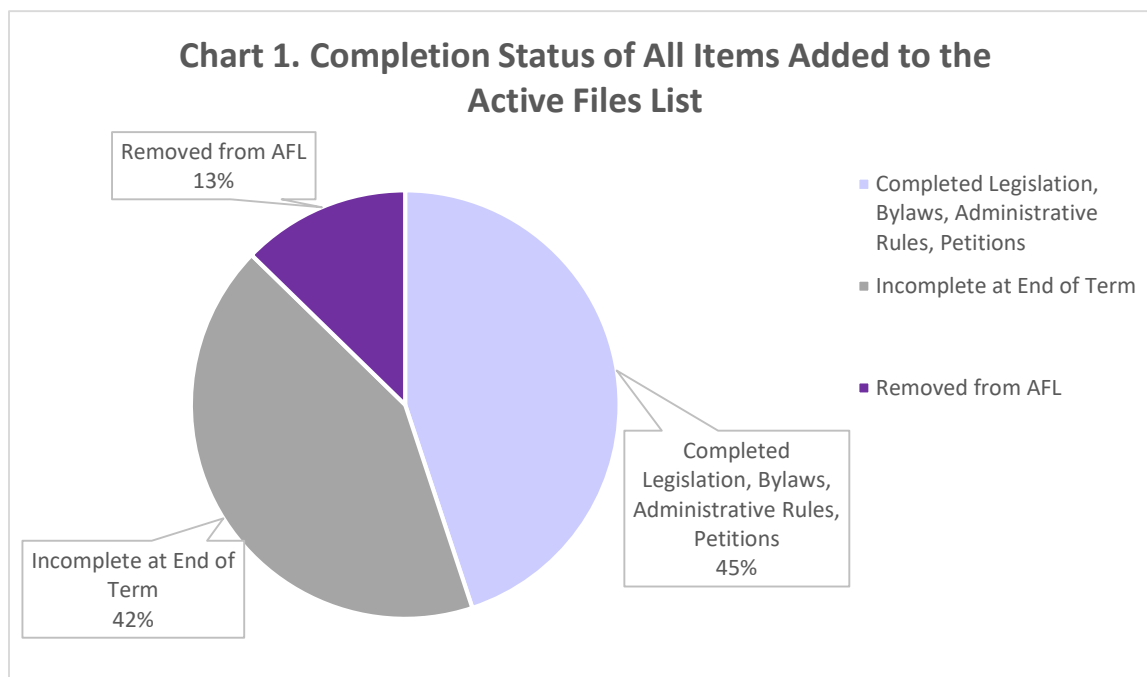
Table 1. below provides a summary of the Legislative Operating Committee's work during the 2023-2026 legislative term. The remainder of the report provides more in-depth details on the accomplishments of the Legislative Operating Committee.

Table 1.	
Summary of the Legislative Operating Committee 2023-2026 Term	
LEGISLATIVE ITEMS	
Legislation	
Laws Adopted or Amended	27
Laws Added to AFL and Incomplete at End of Term	50
Laws Removed from Active Files List	4
<i>Total Legislative Items Added to AFL</i>	81
NON-LEGISLATIVE ITEMS	
Bylaws Amendments	

¹ Marlon Skenandore resigned from the Oneida Business Committee on June 23, 2026. On July 8, 2026, the Oneida Business Committee accepted the resignation noting that it is not possible to hold a special General Tribal Council meeting in compliance with the Ten Day Notice Policy to address the vacancy due to there being two (2) months left in the term and that the 2026 General Election is schedule for July 11, 2026.

Bylaws Amendments Adopted	1
Bylaws Amendments Added to AFL and Incomplete at End of Term	0
Bylaws Removed from AFL	9
Administrative Rules	
Administrative Rules Certified by LOC	16
Administrative Rules Incomplete at End of Term	0
General Tribal Council Petitions	
GTC Petitions Processed	9
GTC Petitions Placed onto AFL and Incomplete at End of Term	0
Total Non-Legislative Items Added to AFL	35
Total Legislative and Non-Legislative Items Added to AFL During Term	116

Chart 1. below looks at the completion status of all items added to the Active Files List at the end of the 2023-2026 term.



Overall, the Legislative Operating Committee completed fifty-three (53) items during the 2023-2026 legislative term, which included work on laws of the Nation – including both new laws and amendments, bylaws, administrative rules, and statements of effect for General Tribal Council petitions. Fifty (50) items remain incomplete at the end of the legislative term. Fifteen (15) items were removed from the Active Files List.

While working on all of these items the Legislative Operating Committee held public meetings and public comment periods for twenty-three (23) pieces of legislation, held over five hundred (500) work meetings, and held sixteen (16) community outreach events.

The Legislative Operating Committee completed approximately **forty-six (46%)** of all work that was placed on the Active Files List during the 2023-2026 legislative term.

LEGISLATION

The main responsibility of the Legislative Operating Committee is the drafting of legislation – including both new laws and amendments to laws. Drafting legislation allows the Nation to exercise its inherent sovereignty. Legislation of the Nation effects every facet of the Nation:

- Legislation assists in creating strong economic systems and ensuring the long-term stability of the Nation;
- Legislation promotes social changes and public safety;
- Legislation provides effective guidance for every area and department of the Nation; and
- Legislation promotes good governance.

The drafting and development of legislation helps build a responsible Nation which advances Onʼyoteʼa.ka principles. The Legislative Operating Committee adopted twenty-seven (27) pieces of legislation this term.

The Legislative Operating Committee utilizes the Legislative Procedures Act to develop legislation. Once the Legislative Operating Committee decides to add a legislative request to its Active Files List the development of proposed legislation begins with conducting research on the topic of the legislation. The Legislative Operating Committee organizes and conducts collaborative work meetings with affected entities to develop the proposed legislation. Once a draft of the proposed legislation is developed and a legislative analysis is completed, the Legislative Operating Committee holds a public meeting and public comment period for the proposed legislation for the purpose of collecting input from the community. Once the Legislative Operating Committee considers all public comments that were received and finalizes the draft, a fiscal impact statement is requested. The proposed legislation is then presented to the Oneida Business Committee or General Tribal Council for adoption.

Table 2. below provides more details on the status of the Legislative Operating Committee’s legislative accomplishments and work during the 2023-2026 legislative term.

Table 2. Legislation During the 2023 - 2026 Term	
ADOPTED LEGISLATION	
New Laws Adopted	5
Safe Neighborhoods Law [<i>Emergency Expires 08/25/26</i>]	BC-02-25-26-C
Probate Law [<i>Emergency Expires 10/22/26</i>]	BC-04-22-26-E



Higher Education Grant Law	BC-04-22-26-F
Elder Protection Law	BC-07-08-26-B
Safe Neighborhoods Law <i>[Emergency Extension Expires 2/25/27]</i>	BC-08-12-26-B
Amendments Adopted	22
Clean Air Policy Amendments	BC-02-14-24-A
Drug and Alcohol Free Workplace Law Amendments	BC_02-14-24-B
Back Pay Law Amendments	BC-07-24-24-C
Vehicle Driver Certification and Fleet Management Law Amendments	BC-09-25-24-B
Computer Resource Ordinance Amendments	BC-10-09-24-A
Investigative Leave Policy Amendments	BC-11-13-24-I
Oneida Life Insurance Plan Law Amendments	BC-01-22-25-B
Oneida Nation Law Enforcement Ordinance Amendments	BC-05-14-25-B
Election Law Emergency Amendments <i>[Emergency Expired 12/25/25]</i>	BC-06-25-25-B
Landlord Tenant Law Amendments	BC-06-25-25-C
Workplace Violence Law Amendments	BC-01-14-26-A
Hunting, Fishing, and Trapping Law Amendments	BC-01-14-26-B
Public Use of Tribal Land Law Amendments	BC-01-28-26-D
Independent Contractor Policy Amendments	BC-01-28-26-E
Budget and Finances Law Amendments	BC-04-22-26-A
Real Property Law Amendments	BC-04-22-26-B
Recycling and Solid Waste Disposal Law Amendments	BC-04-22-26-C
Pardon and Forgiveness Law Amendments	BC-07-08-26-I
Eviction and Termination Law Amendments	BC-07-08-26-J
Election Law Emergency Amendments <i>[Emergency Expires 1/8/27]</i>	BC-07-08-26-K
Boards, Committees, and Commissions Law Amendments	BC-08-12-26-D
Code of Ethics Amendments	BC-08-12-26-C
Total Laws Adopted	27
LEGISLATION ADDED TO AFL BUT INCOMPLETE AT END OF TERM	
New Laws Added to AFL But Incomplete at End of Term	22
Business Corporations Law	
Credit Collections Law	
Culturally Significant Event Participation Program Law	
Data Sovereignty Law	
Fire Signs Law	
GTC Government Participation GWE Law	
Guardianship Law	

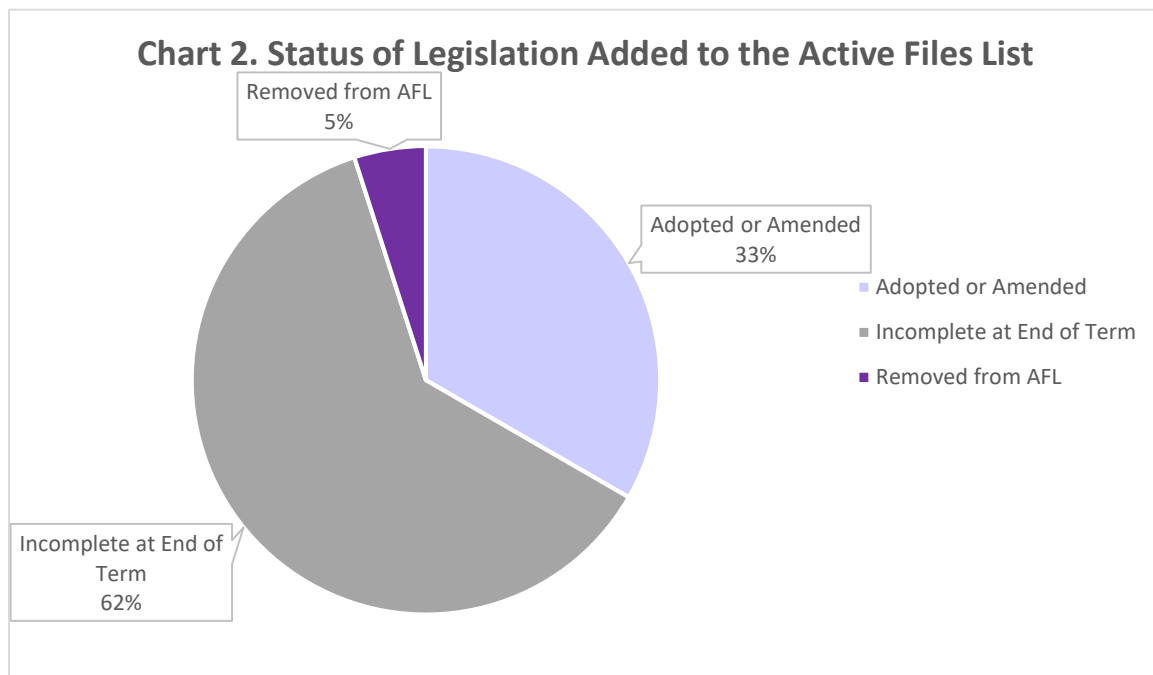
Lavish and Extravagant Trip and Gratuities Law	
Marijuana Law	
Minors Trust General Welfare Assistance Law	
Misappropriation of Funds Law	
Oneida Language Law	
Probate Law <i>[Permanent Adoption]</i>	
Renewable Energy Law	
Safe Neighborhoods Law <i>[Permanent Adoption]</i>	
Sanctions and Penalties Law	
Short-Term Rental Law	
Taxation Law	
Traffic Law	
Tribal Sovereignty in Data Research Law	
Two Spirit Inclusion Law	
Uniform Commercial Code	
Amendments Added to AFL But Incomplete at End of Term	28
All Terrain Vehicle Law Amendments	
Cemetery Law Amendments	
Child Custody, Placement, and Visitation Law Amendments	
Community Support Fund Law Amendments	
Conflict of Interest Law Amendments	
Disposition of Excess Tribal Property Policy Amendments or Repeal	
Domestic Animals Law Amendments	
Election Law Amendments	
Endowments Law Amendments	
Furlough Law Amendments	
General Tribal Council Meeting Stipend Payment Policy Amendments	
Indian Preference in Contracting Law Amendments	
Judiciary Law Amendments	
Layoff Policy Amendments	
Local Land Use Regulation Reimbursement Policy Repeal	
Marriage Law Amendments	
Oneida General Welfare Law Amendments	
Oneida Personnel Policies and Procedures Amendments	
Oneida Travel and Expense Policy Repeal	
Oneida Worker’s Compensation Law Amendments	
On-Site Waste Disposal Law Amendments	
Ten Day Notice Policy Amendments	
Tribal Environmental Response Law Amendments	

Tribal Environmental Quality Review Law Amendments	
Vendor Licensing Law Amendments	
Water Resources Law Amendments	
Well Abandonment Law Amendments	
Whistleblower Protection Law Amendments	
Total Laws Remaining on AFL	50
LEGISLATION REMOVED FROM AFL	
Laws Removed from AFL	4
Environmental Review Law	
Gift Card Law	
Oneida General Welfare Law Amendments	
Oneida Land Trust Law	

See **Attachment 1.** for a visual representation of all legislation on the Active Files List during the 2023-2026 legislative term and its current progress at the end of term.

See **Attachment 2.** for a summary of all adopted or amended legislation for the 2023-2026 legislative term.

Chart 2. below looks at the status of all legislative items – meaning new laws and amendments to laws - added to the Active Files List at the end of the 2023-2026 term.



Looking specifically at legislation of the Nation, twenty-seven (27) legislative items, including new laws and amendments to laws, were adopted into law during the 2023-2026 legislative term. Fifty (50) legislative items remain incomplete on the Active Files List at the end of term. Four (4) legislative items were removed from the Active Files List during the 2023-2026 term.

The Legislative Operating Committee completed approximately thirty-three percent (33%) of legislative items that were placed on the Active Files List during the 2023-2026 term. For comparison, here are the completion rates for legislation specifically during prior terms:

- 2020-2023 term - forty-seven percent (47%);
- 2017-2020 term - fifty-six percent (56%);
- 2014-2017 term - fifty-three percent (53%);
- 2011-2014 term - fifty-four percent (54%); and
- 2008-2011 term - fifty-eight percent (58%).

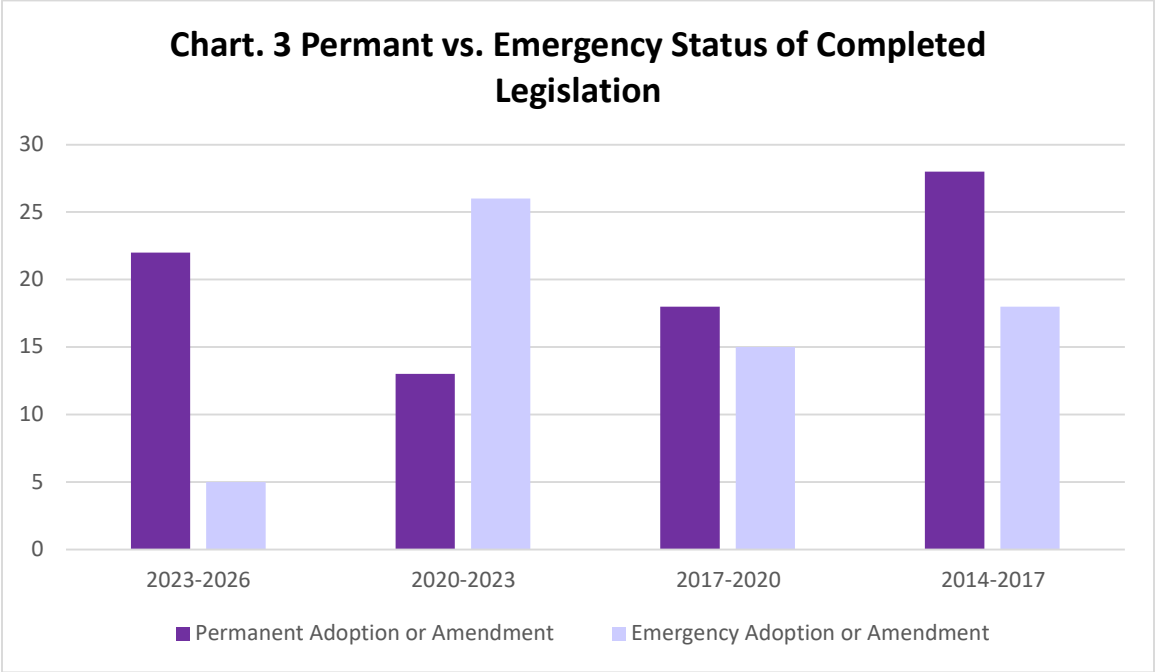
Although it appears that the Legislative Operating Committee's completion rate was less than prior terms – it is important to look closer at the composition of the work completed each term, specifically in regard to the ratio of work that was completed on an emergency and permanent basis.

During the 2023-2026 legislative term, the Legislative Operating Committee was careful to closely follow the Legislative Procedures Act's standard for emergency legislation, while focusing much of its effort on the development of permanent legislation. This legislative term only five (5) out of the twenty-seven (27) pieces of legislation adopted or amended were completed on an emergency basis – meaning that eighty-one (81%) of the completed work was completed on a permanent basis.

For comparison, below is the data for the percentage of legislation completed on a permanent basis during prior terms:

- 2020-2023 term - Thirteen (13) out of thirty-nine (39) laws adopted or amended on a permanent basis – thirty-three percent (33%) of the completed work.
- 2017-2020 term - Eighteen (18) out of thirty-three (33) laws adopted or amended on a permanent basis – fifty-five percent (55%) of the completed work.
- 2014-2017 term - Twenty-eight (28) out of forty-six (46) laws adopted or amended on a permanent basis – sixty-one percent (61%) of the completed work.

Chart 3. below looks at the ratio of permanent and emergency status of all legislative items adopted or amended at the end of the 2023-2026 term.



Although the Legislative Operating Committee’s rate of completion overall for legislation added to the Active Files List may be lower than prior terms, when specifically looking at the ratio of permanent work completed compared to emergency work completed, the Legislative Operating Committee completed a higher percentage of legislation on a permanent basis this term in comparison to prior terms.

BYLAWS AMENDMENTS

For many years the Legislative Operating Committee has assisted boards, committees, and commissions with the drafting of their bylaws, and also provided a legislative analysis of all bylaws which provided a plain English explanation of the changes and also ensured the bylaws were in compliance with the Boards, Committees, and Commissions law as well as any other law of the Nation.

Table 3. below demonstrates the status of all bylaws that were added to the Active Files List during the 2023-2026 legislative term.

Table 3.	
Bylaws During the 2023-2026 Term	
ADOPTED BYLAWS	
Audit Committee Bylaws Amendments	
Total Bylaws Adopted	1
BYLAWS ADDED TO AFL BUT INCOMPLETE AT END OF TERM	



<i>Total Bylaws Remaining on AFL</i>	0
BYLAWS REMOVED FROM AFL	
Finance Committee Bylaws Amendments	
Oneida Election Board Bylaws Amendments	
Oneida Nation Commission on Aging Bylaws Amendments	
Oneida Nation School Board Bylaws Amendments	
Oneida Nation Veterans Affairs Committee Bylaws Amendments	
Oneida Personnel Commission Bylaws Amendments	
Pardon and Screening Committee Bylaws Amendments	
Southeastern Wisconsin Oneida Tribal Services Advisory Board Bylaws Amendments	
Onayote?a·ká ni?i Commission Bylaws	
<i>Total Bylaws Removed from AFL</i>	9

Looking specifically at bylaws of the Nation, one (1) set of bylaws were amended during the 2023-2026 legislative term. No bylaws remain incomplete on the Active Files List at the end of term. Nine (9) sets of bylaws were removed from the Active Files List during the 2023-2026 term.

The Legislative Operating Committee completed approximately ten percent (10%) of bylaws that were placed on the Active Files List during the 2023-2026 term.

During the 2023-2026 the Legislative Operating Committee transferred the responsibility to assist with amending and developing bylaws from the Legislative Operating Committee to the Oneida Law Office and the Government Administrative Office.

Previously, when a board, committee, or commission sought amendments to their bylaws they submitted a request to the Legislative Operating Committee. The Legislative Operating Committee then decides to either accept the request and add the bylaws amendments to its Active Files List or deny the request for amendments. If bylaws are added to the Active Files List for amendments to be made, the Legislative Operating Committee then assigns an attorney from the Legislative Reference Office to assist with drafting and/or processing the bylaws amendments so they ultimately can be presented to the Oneida Business Committee for adoption.

The Boards, Committees, and Commissions law requires that amendments to bylaws of boards, committees, and commissions of the Nation be approved by the Oneida Business Committee, in addition to the General Tribal Council when applicable, prior to implementation. [1 O.C. 105.11-1/]. It is not required that amendments to bylaws be processed through the Legislative Operating Committee.

Now, the Government Administrative Office and the board, committee, or commission's assigned attorney from the Oneida Law Office assist in developing amendments to bylaws. This change in

process allows bylaw amendments to be directly placed on an Oneida Business Committee meeting agenda for approval. This means the Legislative Operating Committee no longer processes amendments to bylaws for boards, committees, and commissions of the Nation, which streamlines the amendment process.

The Government Administrative Office and the Oneida Law Office began aiding boards, committees, and commissions with processing amendments to their bylaws on June 1, 2024.

The Legislative Operating Committee, Oneida Law Office, and the Government Administrative Office believe this change created a more efficient and effective process for amending bylaws of boards, committees, and commissions of the Nation.

GENERAL TRIBAL COUNCIL PETITIONS

The Constitution and Bylaws of the Oneida Nation provides that fifty (50) qualified voters may, by written notice, call special meetings of the General Tribal Council. *[Article III Section 6 of the Constitution]*. The Oneida Business Committee requires that when a petition for a special General Tribal Council meeting is submitted a statement of effect, legal, and financial opinion are developed regarding the petition so that the information can be shared with the General Tribal Council in order to assist in creating informed discussion and improved decision-making. The Legislative Reference Office provides a statement of effect for all petitions. The statement of effect for petitions explains the legislative impact adopting the requested action of a petition would have on the laws and policies of the Nation.

Table 4. below provides the number of General Tribal Council petitions a statement of effect was provided for during the 2023-2026 term:

Table 4.
General Tribal Council Petitions during the 2023-2026 Term
GENERAL TRIBAL COUNCIL PETITIONS COMPLETED
Petition: C. Kestell – Address Housing Issues/Veterans Home Loan Program #2024-01
Petition: L. Blackowl - New Recreation/Community Center Build #2024-02
Petition: S. Benton – Move Oneida Nation Art Program under Tourism or Community Development #2024-03
Petition: S. Benton –Personnel Policies and Procedures Amendments #2025-01
Petition: S. Benton – Trial Court Rules Amendments #2025-02
Petition: K. Schultz – General Welfare Assistance Payment to Membership #2025-03
Petition: G. Powless-Buenrostro – Accountability Measure Options for BC and BCC's #2025-04



Petition: G. Powless-Buenrostro – Amend Administrative Rulemaking Law #2025-05	
Petition: G. Powless-Buenrostro – Amend Judiciary Law #2026-01	
<i>Total GTC Petitions Completed</i>	9
GENERAL TRIBAL COUNCIL PETITIONS INCOMPLETE AT END OF TERM	
<i>Total GTC Petitions Incomplete at End of Term</i>	0
GENERAL TRIBAL COUNCIL PETITIONS REMOVED FROM AFL	
<i>Total GTC Petitions Removed from AFL</i>	0

Looking specifically at General Tribal Council petitions for the Nation, nine (9) statements of effect for General Tribal Council petitions were completed during the 2023-2026 legislative term. Zero (0) statement of effects for General Tribal Council petitions remain incomplete on the Active Files List at the end of term.

The Legislative Operating Committee completed work on one hundred percent (100%) of statements of effect for General Tribal Council petitions that were placed on the Active Files List during the 2023-2026 term.

ADMINISTRATIVE RULES

The Legislative Operating Committee assists in the development of rules under the Administrative Rulemaking law. Upon request the Legislative Operating Committee will provide guidance and drafting assistance to any entity of the Nation that has been delegated administrative rulemaking authority and tasked with the development of a rule. Once a rule has been drafted by an entity, the Legislative Reference Office provides the entity with a statement of effect for the proposed rule. The statement of effect explains the impact adopting a rule would have on the laws and policies of the Nation and provides whether the rule exceeds the delegated rulemaking authority.

The Legislative Operating Committee is then tasked with certifying a rule before it is presented to the Oneida Business Committee for consideration. The Legislative Operating Committee reviews the proposed rule and accompanying administrative record to ensure that the promulgation of the rule complies with the procedural requirements contained in this law; that the administrative record is complete; and that the rule does not exceed its rulemaking authority or conflict with any other law, policy, rule or resolution of the Nation.

Table 5. below demonstrates the administrative rules that have been certified by the Legislative Operating Committee and adopted, amended, or repealed by the Oneida Business Committee during the 2023-2026 term.

Table 5. Administrative Rules Certified During the 2023-2026 Term		
COMPLETED ADMINISTRATIVE RULES		
<i>Rule</i>	<i>Certification Date</i>	<i>Adoption Date</i>
Leasing Law Rule No. 6 - Homeownership by Independent Purchase (HIP) Program Amendments	3/6/24	3/27/24
Landlord-Tenant Law Rule No. 2 - Income Based Rental Program Eligibility, Selection and Other Requirements Amendments	8/1/24	8/14/24
Real Property Law Rule No. 2 - Comprehensive Housing Division Residential Sales Amendments	10/16/24	11/13/24
Real Property Law Rule No 1 - Land Assessments for the Nation's Decisionmakers to Build an Autonomous Community	2/5/25	2/12/25
Real Property Law Rule No 2 – Land Use Licenses	2/5/25	2/12/25
Real Property Law Rule No. 3 - Easements	2/19/25	2/26/25
Leasing Law Rule No. 2 – Agricultural Leases Amendments	3/16/26	None
Real Property Law Rule No. 3 – Easements Emergency Amendments	5/6/26	5/13/26
Higher Education Grant Law Rule No. 1 – Student Eligibility Requirements and Administration	7/1/26	7/8/26
Real Property Law Rule No. 3 – Easements Amendments	8/19/26*	-
Technology Resource Law Rule No. 1 – Acceptable Use	8/19/26*	-
Technology Resource Law Rule No. 2 – Clear Desk/Screen	8/19/26*	-
Technology Resource Law Rule No. 3 – Asset Management	8/19/26*	-
Technology Resource Law Rule No. 4 – Security Awareness Training	8/19/26*	-
Technology Resource Law Rule No. 8 – Third Party Providers	8/19/26*	-
Technology Resource Law Rule No. 9 – Generative AI Usage	8/19/26*	-
Total Completed Administrative Rules	16	
INCOMPLETE ADMINISTRATIVE RULES REMAINING ON AFL		
Total Incomplete Administrative Rules on the AFL	0	

Looking specifically at administrative rules for the Nation, sixteen (16) administrative rules were completed during the 2023-2026 legislative term. This includes seven (7) administrative rules noted with a * in the chart that are on the agenda to be certified at the August 19, 2026, Legislative Operating Committee meeting when this memorandum is also on the agenda, and then sent to the August 26, 2026, Oneida Business Committee for consideration of adoption. Zero (0)

administrative rules remain incomplete on the Active Files List at the end of term. Zero (0) administrative rules were removed from the Active Files List during the 2023-2026 term.

The Legislative Operating Committee completed work on one hundred percent (100%) of administrative rules that were placed on the Active Files List during the 2023-2026 term.

COMMUNITY OUTREACH EVENTS

During the 2023-2026 Legislative Term the Legislative Operating Committee focused its efforts on enhancing community involvement through outreach and communication. The Legislative Operating Committee prioritized community engagement by holding various community outreach events throughout the term outside of those typically required by the legislative process in the Legislative Procedures Act.

Table 5. below demonstrates the various community outreach events the Legislative Operating Committee held during the 2023-2026 term.

Table 6. Community Outreach Events Held During the 2023-2026 Legislative Term	
COMMUNITY MEETINGS	
December 6, 2023 Community Meeting: Elder Protection Law, Oneida Language Law, Higher Education Scholarship Law	
March 6, 2024 Community Meeting: Oneida Personnel Policies and Procedures, Sanctions and Penalties Law, Eviction and Termination Law Amendments	
June 4, 2024 Community Meeting: Hunting, Fishing, and Trapping Law Amendments, Guardianship Law	
June 19, 2024 Community Meeting: Eviction and Termination Law Amendments	
September 4, 2024 Community Meeting: Limited Liability Company Law, Probate Law	
December 4, 2024 Community Meeting: Marijuana Law, Short Term Rental Law, Boards, Committees, and Commissions Law Amendments	
March 19, 2025 Community Meeting: Elder Protection Law, Hunting, Fishing, and Trapping Law Amendments, and Indian Preference in Contracting Law Amendments	
June 18, 2025 Community Meeting: Ten Day Notice Policy Amendments, Election Law Amendments, and Renewable Energy Law	
September 17, 2025 Community Meeting: Budget and Finances Law Amendments, Higher Education Grant Law, Elder Protection Law	
June 29, 2026 Community Meeting: 2023-2026 Legislative Term Accomplishments, Issues for Consideration during 2026-2029 Legislative Term, Holding Community Meetings	
Total Community Meetings Held	10

COMMUNITY WORK SESSIONS	
April 2, 2024 Community Work Session: Eviction and Termination Law Amendments	
April 2, 2025 Community Work Session: Sanctions and Penalties Law	
<i>Total Community Work Sessions Held</i>	2
ONEIDA FARMERS MARKET	
August 14, 2025 Oneida Farmers Market	
August 28, 2025 Oneida Farmers Market	
September 11, 2025 Oneida Farmers Market	
September 25, 2025 Oneida Farmers Market	
<i>Total Oneida Farmers Markets Attended</i>	4
<i>Total Community Outreach Events</i>	16

The Legislative Operating Committee held ten (10) community meetings this legislative term. Community meetings were held from 5:30 p.m. through 7:30 p.m. in the in the Norbert Hill Center's cafeteria. Topics for discussion were assigned to each community meeting, and the community was invited to come share a meal with the Legislative Operating Committee and take part in open discussion in which people could share comments, questions, or suggestions on potential issues that should be addressed regarding the topics discussed.

The Legislative Operating Committee held two (2) community work sessions this legislative term. Community work sessions were held from 12:00 p.m. through 1:30 p.m. in the Norbert Hill Center's Business Committee Conference Room as well as on Microsoft Teams. The purpose of a community work session was to read through a designated law line-by-line and collect comments, questions, or suggestions from the community in attendance for how to potentially amend the language included in the law.

The Legislative Operating Committee attended four (4) Oneida Farmers Market. At the Oneida Farmers Market the Legislative Operating Committee had a booth from 12:00 p.m. through 6:00 p.m. in which members of the Legislative Operating Committee were present to talk with the community, answer questions, listen to ideas, and share information on legislation that was being developed.

Prioritizing holding community outreach events provided the community with more opportunities to learn about and become involved in the legislative process, which only leads to better legislation for the Nation.

CONCLUSION

The Legislative Operating Committee's 2023-2026 legislative term was successful. Important legislative work was completed that aligns with the Oneida Nation's vision, *A Nation of strong families built on Tsi ʔNiyukwaliho TÁ and a strong economy.*

The Legislative Operating Committee hopes that the 2026-2029 legislative term will continue to focus on improving public participation and the development of important legislative efforts.

Yawáko.



The 2023-2026 Legislative Operating Committee

From left to right:

Vice Chairman Kirby Metoxen, Chairman Jameson Wilson, Jennifer Webster, Marlon Skenandore, and Jonas Hill

Attachment 1.

LEGISLATIVE OPERATING COMMITTEE ACTIVE FILES LIST 2023-2026

Updated 08/13/2026

<i>Legislation Name</i>	<i>Sponsor</i>	<i>Research</i>	<i>Drafting/ Work Meetings</i>	<i>Draft Approved by LOC</i>	<i>Leg. Analysis</i>	<i>Public Meeting</i>	<i>Fiscal Impact Statement</i>	<i>LOC Approved Adoption Packet</i>	<i>OBC or GTC Adoption</i>
All Terrain Vehicle Law Amends	Jonas Hill								
Back Pay Law Amendments	Jonas Hill	BC-07-24-24-C							
Boards, Committees, and Commissions Law Amends	Kirby Metoxen	BC-08-12-26-D							
Budget and Finances Law Amends	Jennifer Webster	BC-04-22-26-A							
Business Corporations Law	Jameson Wilson								
Cemetery Law Amends	Jonas Hill								
Child Custody, Placement, and Visitation Law Amendments	Jameson Wilson								
Clean Air Policy Amendments	Jennifer Webster	BC-02-14-24-A							
Code of Ethics Law Amends	Jennifer Webster	BC-08-12-26-C							
Community Support Fund Law Amends	Jennifer Webster								
Computer Resources Law Amendments	Jameson Wilson	BC-10-09-24-A							
Conflict of Interest Law Amends	Jonas Hill								
Credit Collections Law	Jennifer Webster								
Culturally Significant Event Participation Program Law	Kirby Metoxen								
Data Sovereignty Law	Jameson Wilson								
Disposition of Excess Tribal Property Policy Amendments or Repeal	Kirby Metoxen								
Domestic Animals Law Amends	Jonas Hill								
Drug and Alcohol Free Workplace Law Amendments	Jonas Hill	BC-02-14-24-B							
	Kirby Metoxen								
Elder Protection Law	Jennifer Webster	BC-07-08-26-B							
Election Law Emergency Amends (12/25/25)	Jonas Hill	BC-06-25-25-B							
Election Law Emergency Amends (1/8/27)	Jonas Hill	BC-07-08-26-K							
Election Law Amends	Jonas Hill								
Endowments Law Amends	Jennifer Webster								
Eviction and Termination Law Amends	Jonas Hill	BC-07-08-26-J							
Fire Signs Law	Jennifer Webster								
Furlough Law Amends	Jennifer Webster								
General Tribal Council Stipend Payment Policy Amendments	Kirby Metoxen								
GTC Government Participation GWE Law	Jonas Hill								

Attachment 1.

LEGISLATIVE OPERATING COMMITTEE ACTIVE FILES LIST 2023-2026

Updated 08/13/2026

Guardianship Law	Kirby Metoxen								
Higher Education Scholarship Law	Jameson Wilson	BC-04-22-26-F							
Hunting, Fishing, & Trapping Law Amends	Jonas Hill	BC-01-14-26-B							
Independent Contractor Law Amends	Jonas Hill	BC-01-28-26-E							
Indian Preference in Contracting Law Amends	Jonas Hill								
Investigative Leave Policy Amendments	Marlon Skenandore	BC-11-13-24-I							
Judiciary Law Amendments	Jameson Wilson								
Landlord Tenant Law Amends	Jonas Hill	BC-06-25-25-C							
Lavish & Extravagant Trip & Gratuities Law	Jonas Hill								
Law Enforcement Ordinance Amends	Jonas Hill	BC-05-14-25-B							
Layoff Policy Amendments	Jennifer Webster								
Local Land Use Regulation Reimbursement Policy Repeal	Kirby Metoxen								
Marijuana Law	Jameson Wilson								
Marriage Law Amendments	Jennifer Webster								
Minors Trust General Welfare Assistance Law	All LOC								
Misappropriation of Funds Law	Jennifer Webster								
Oneida General Welfare Law Amendments	Jameson Wilson								
	Jonas Hill								
Oneida Language Law	Jennifer Webster								
	Kirby Metoxen								
Oneida Personnel Policies and Procedures Amends	All LOC								
Oneida Life Insurance Plan Law Amendments	Jameson Wilson	BC-01-22-25-B							
Oneida Travel and Expense Policy Repeal	Jennifer Webster								
Oneida Worker's Compensation Amends	Jameson Wilson								
Onsite Waste Disposal Law Amends	Jonas Hill								
Pardon and Forgiveness Law Amendments	Jennifer Webster	BC-07-08-26-I							
Plastic Free Law	Jameson Wilson								
Probate Law Emergency Adoption (Exp. 10/22/26)	Kirby Metoxen	BC-04-22-26-E							
	Jameson Wilson								
Probate Law	Kirby Metoxen								
	Jameson Wilson								
Public Use of Tribal Land Law Amends	Jonas Hill	BC-01-28-26-D							

Attachment 1.

LEGISLATIVE OPERATING COMMITTEE ACTIVE FILES LIST 2023-2026

Updated 08/13/2026

Real Property Law Amends	Jameson Wilson	BC-04-22-26-B						
Recycling and Solid Waste Disposal Law Amends	Kirby Metoxen	BC-04-22-26-C						
	Jonas Hill							
Renewable Energy Law	Jameson Wilson							
Safe Neighborhoods Law Emergency Adoption (Exp. 8/25/26)	Jameson Wilson	BC-02-25-26-C						
Safe Neighborhoods Law Emergency Adoption Extension (Exp. 2/25/27)	Jameson Wilson	BC-08-12-26-B						
Safe Neighborhoods Law	Jameson Wilson							
Sanctions and Penalties Law	Jennifer Webster							
Short Term Rental Law	Jonas Hill							
Taxation Law	Jameson Wilson							
Time and Attendance Law for Elected Officials	Jonas Hill							
Ten Day Notice Policy Amends	Jennifer Webster							
	Jameson Wilson							
Traffic Law	Jennifer Webster							
Tribal Environmental Response Law Amends	Jonas Hill							
Tribal Environmental Quality Review Law Amends	Jonas Hill							
Tribal Sovereignty in Data Research Law	Jennifer Webster							
Two Spirit Inclusion Law	Jennifer Webster							
Uniform Commercial Code	Jameson Wilson							
Vehicle Driver Certification and Fleet Management Law Amendments	Jameson Wilson	BC-09-25-24-B						
Vendor Licensing Law Amends	Jonas Hill							
Water Resources Law Amends	Jonas Hill							
Well Abandonment Law Amends	Jonas Hill							
Workplace Violence Law	Jennifer Webster	BC-01-14-26-A						

Attachment 2.

Legislative Operating Committee
Accomplishments Summary
2023-2026

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Attachment 2.

BACK PAY LAW AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-07-24-24-C
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Purpose: Set forth standards used in the reinstatement of an employee and the calculation of back pay for all employees of the Nation in accordance with the Nation's laws.

Amendments:

- Include a new section in the law which provides for the reinstatement of employee who had involuntary separation overturned and addresses such issues as:
 - Requirement to hold a position pending litigation;
 - Amending the position description or eliminating the position pending an employee appeal;
 - Reinstatement to the position the employee was involuntarily separated from;
- Clarify that back pay calculations shall be made using the employee's last wage in the position which they were terminated from; and
- Clarify the circumstances in which an employee is not eligible to work, and therefore is not eligible for back pay.

BOARDS, COMMITTEES, AND COMMISSIONS LAW AMENDMENTS

Sponsor: Kirby Metoxen	Drafter: Carolyn Salutz	BC-08-12-26-D
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Purpose: Govern boards, committees, and commissions of the Nation, including the procedures regarding the appointment and election of individuals to boards, committees, and commissions, creation of bylaws, maintenance of official records, compensation, to establish clear standards of conduct, and other items related to boards, committees, and commissions.

Amendments:

- Clarify the purpose of the amendments is to establish clear standards of conduct.
- Clarify it is the policy of the Nation that appointed and elected individuals serving on a board, committee, or commission of the Nation carry themselves in a way that brings honor to the Oneida people and government.
- Strengthen, clarify, and add definitions for Conflict of Interest, fiscal year, letter, member, political appointee, and Secretary.
- Clarify the Oneida Business Committee or designee shall be responsible for drafting the initial bylaws and the Oneida Business Committee will approve the initial bylaws.
- Clarify the responsibilities of the Boards, Committees, Commissions Department, including:
 - responsibilities once managed by the Business Committee Support Office; and
 - managing offboarding procedures for when a member leaves an entity.

Attachment 2.

- Clarify when a member's term ends, the member may remain in their position until the successor is sworn in but no longer than sixty (60) business days. This helps prevent discontinuation of services but by setting a sixty-day (60) deadline also reinforces appropriate turnover.
- Clarify all entities must be in compliance with the Nation's travel policies.
- Clarify all entities must address conflict resolution and leaves of absence in their bylaws.
- Clarify all entities must include a procedure for withholding a member's stipend in their bylaws.
- Clarify that rather than the requirement to submit quarterly reports to the Oneida Business Committee, all entities will be required to submit at least two reports each fiscal year to the Oneida Business Committee.
- Clarify all entities may hold virtual meetings pursuant to any requirements established by the Oneida Business Committee and pursuant to any additional requirements established by the entity.
- Clarify that every appointed and elected member will receive an official Oneida Nation email address.
- Clarify standards of conduct such as:
 - A good mind;
 - cultural accountability;
 - several instances of prohibited conduct;
 - attendance and meeting conduct;
 - nepotism;
 - gifts and honorarium; and
 - fair dealing and impartiality.
- Clarify how the Nation will manage actual or implied conflicts of interest including the creation and maintenance of annual and as-needed disclosure forms.
- Add a requirement that all members shall submit disclosure forms annually and within a reasonable time after a conflict arises or becomes known.
- Clarify all entities may develop an internal conflict of interest mitigation plan for eligible conflicts in consultation with the Oneida Law Office, the Nation's Human Resources Department, and other departments of the Nation as needed.
- Clarify which positions may not be eligible to serve on an appointed or elected board because of the potential for an actual or implied conflict of interest.
- Clarify that members have an ongoing duty to disclose and shall promptly disclose and comply with the requirements of a conflict of interest mitigation plan.
- Clarify enforcement provisions.
- Include appeal rights; if applicable, a member shall have the right to appeal an enforcement action pursuant to the requirements and procedures regarding appeals of the law under which the member received a sanction or penalty.

Attachment 2.

BUDGET AND FINANCES LAW AMENDMENTS

Sponsor: Jennifer Webster	Drafter: Clorissa Leeman	BC-02-22-26-A
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Purpose: Set forth the requirements to be followed by the Oneida Business Committee and the Oneida fund units when preparing the budget to be presented to the General Tribal Council for approval, and to establish financial policies and procedures for the Nation.

Amendments:

- Remove the requirement that the Oneida Business Committee develop priorities, a strategic plan, or broad goals to assist in guiding the budget.
- Remove the requirement that the Chief Financial Officer ensure the Nation's budget is properly implemented, and instead require that the Chief Financial Officer report to the Oneida Business Committee and/or Executive Managers any expenditures that do not follow budget guidelines or conform to the budget. [
- Require that the Chief Financial Officer assist with the submission and presentation of the Treasurer's report to the Oneida Business Committee, which shall specifically include any monthly variances that are one hundred thousand dollars (\$100,000) or more in total instead of a difference of three percent (3%) or more from the adopted annual budget or fifty thousand dollars (\$50,000) or more in total.
- Require the Chief Financial Officer to inform the Oneida Business Committee of any Executive Managers and/or fund unit which does not follow the budget development process guidelines or deadlines as set forth by the Treasurer.
- Require managers to report to the CFO and their relevant Executive Manager explanations and corrective actions for any monthly variance that is one hundred thousand dollars (\$100,000) or more in total instead of a difference of three percent (3%) or more from the adopted annual budget or fifty thousand dollars (\$50,000) or more in total.
- Eliminate that the contents of the budget include a description of each line item within each fund unit's budget, the estimated expenditures by each fund unit, and a summary of employment position counts including prior year, current year, and budgeted year.
- Rename the Permanent Executive Contingency Fund Account the Financial Sovereignty Fund.
- Eliminate the Grant Reserve Fund Account, instead including sustaining grant operations in the purpose of the Financial Sovereignty Fund.
- Require that the Treasurer submit the budget guidelines to the Oneida Business Committee for review and approval through the adoption of a resolution no later than March 1st of each calendar year.
- Provide that it is the Chief Financial Officer, and not the Treasurer, that is responsible for receiving, reviewing, and compiling the proposed budgets from all the fund units into the Nation's draft budget.

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- Eliminate the section of the law that addressed fees and charges.
- Add a threshold of two hundred and fifty thousand dollars (\$250,000) or more for when a fund unit has to seek approval by the Oneida Business Committee, and a fiscal analysis by the Chief Financial Officer for any unbudgeted expenditure.
- Clarify that for unexpended capital improvement funds they do not carry over to the next fiscal year budget, but instead carry over at the end of each fiscal year and remain available for use.
- Eliminate the section on unexpended capital expenditure funds.
- Eliminate the provisions of the Law governing capital improvements.
- Eliminate provisions of the Law governing how grant fund can be utilized, exhaustion of non-tribal funds, grant reporting, and the Grant Reserve Fund Account.
- Require that prior to the acquisition of any debt, the Nation shall obtain an amortization schedule for the repayment of the debt.
- Eliminate the provisions which provides that employment positions that are fully funded through grants shall not be included in the employment cap.
- Allow the budget contingency plan to respond to or prepare for potential extreme financial distress.
- Clarify that when the Chief Financial Officer, not the Oneida Business Committee, determines that the Nation is under extreme financial distress, or may face extreme financial distress in the near future, the CFO shall inform the Oneida Business Committee, and the Oneida Business Committee shall be responsible for implementing the budget contingency plan.

CLEAN AIR POLICY AMENDMENTS		
Sponsor: Jennifer Webster	Drafter: Clorissa Leeman	BC-02-14-24-A

Purpose: Provide a healthy working and learning environment within buildings and vehicles owned and operated by the Nation by prohibiting smoking.

Amendments:

- Include a new exemption to the prohibition of smoking, which is a tobacco store, on or in premises controlled by Oneida Retail, that sells tobacco product, unless prohibited by Oneida Retail or the terms and conditions of the lease or land or building assignment.
- Clarify the exemption to the prohibition of smoking for residential buildings owned by the Nation only applies if not otherwise prohibited by a lease or rental agreement.
- Eliminate the requirement that a suspension for a second violation of this law be one (1) week in length, providing the supervisor and HRD greater flexibility in determining a suspension length that best fits the violation.

Attachment 2.

CODE OF ETHICS AMENDMENTS		
Sponsor: Jennifer Webster	Drafter: Grace Elliott	BC-08-12-26-C

Purpose: Establish clear standards of conduct rooted in the values of the Oneida people, to guide those entrusted with authority in serving the Nation with honor and responsibility. These standards reflect the sacred trust between the government and the people, and are intended to promote integrity, uphold the will of the Nation, and preserve the confidence of the Oneida people

Amendments:

- Update the Code of Ethics so it clearly focuses on the Oneida Business Committee, bringing all expectations for how leaders should conduct themselves into one easy to understand law.
- Integrate the Great Law of Peace into the ethical foundation, affirming decision making grounded in peace, unity, and thoughtful deliberation as cultural mandates for governance.
- Ground the ethical framework in the Good Mind teachings, infusing leadership obligations with humility, compassion, clarity, and community centered thinking.
- Articulate the concept of Sacred Trust, emphasizing leadership as a duty held on behalf of past, present, and future generations rather than an individual entitlement.
- Clarify the definition of “Conflict of Interest” to encompass financial, personal, and political interests affecting leaders and their immediate families, reinforcing impartial stewardship.
- Mandate transparent disclosure of conflicts, ensuring ethical clarity consistent with the Good Mind’s call for honesty and openness in governance.
- Require OBC members to recuse themselves from matters in which conflicts exist, upholding the Great Law of Peace’s expectation that leaders avoid self interest.
- Implement structured annual and as needed conflict of interest filings, creating accountability mechanisms that reinforce responsible leadership.
- Modernize gift and honoraria reporting by increasing financial thresholds and updating reporting processes to better reflect contemporary governance realities including public disclosure.
- Prohibit acceptance of gifts tied to influence or business advantage, protecting the Nation’s decision making from external pressure and maintaining community trust.
- Regulate OBC members’ applications for positions that report directly to the Committee, preventing conflicts before they arise and strengthening procedural fairness.
- Safeguard confidential information by restricting its use for personal, financial, or political benefit, aligning with the Haudenosaunee value of responsible and respectful speech.
- Promote fairness and impartiality in leadership actions, ensuring decisions are made through unbiased judgment grounded in the Good Mind and collective well being.

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- Prohibit nepotism in hiring, supervision, and resource decisions, maintaining equitable access and protecting the legitimacy of OBC leadership.
- Reinforce accountability and transparency as essential qualities of public office, affirming that OBC authority flows from the people and must remain answerable to them.
- Elevate cultural accountability by requiring OBC members to conduct themselves in ways that honor Oneida identity, teachings, and responsibilities.
- Strengthen expectations for meeting attendance, preparation, and professional engagement, acknowledging that presence and participation are integral to carrying the Sacred Trust.
- Codify a comprehensive list of prohibited behaviors—including retaliation, discrimination, misuse of office, and corruption—to uphold dignity and protect community confidence in leadership.
- Align enforcement with broader Nation laws to provide consistency, due process, and integrity in the handling of ethical violations.

COMPUTER RESOURCES ORDINANCE AMENDMENTS		
Sponsor: Jameson Wilson	Drafter: Clorissa Leeman	BC-10-09-24-A

**Now Technology Resources Law*

Purpose: Regulate the usage of technology resources and processed data owned and operated by the Nation.

Amendments:

- Revise the title and references throughout the Law from “computer resources” to “technology resources.”
- Clarify that users are expected to conduct themselves professionally and to refrain from using technology resources of the Nation for activities that are inappropriate no matter in what location the user utilizes the technology resources of the Nation
- Clarify that it shall not be deemed an inappropriate use for a user to share information or evidence regarding the inappropriate use of another user if reporting the inappropriate use in accordance with the proper reporting structure.
- Clarify that any standard operating procedure defining excessive use of technology resources for any user that is an employee of the Nation is required to be developed in accordance with all other laws and rules of the Nation.
- Include a new provision in which DTS is delegated rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation.

Attachment 2.

DRUG AND ALCOHOL FREE WORKPLACE LAW AMENDMENTS

Sponsor: Kirby Metoxen and Jonas Hill	Drafter: Clorissa Leeman	BC-02-14-24-B
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Purpose: Establishes a drug and alcohol-free workplace program that balances respect for individuals with the need to maintain an alcohol and drug-free environment

Amendments:

- Exempt an external applicant's confirmed positive THC test result from the requirement of a negative drug test result for pre-employment eligibility unless prohibited by an external licensing or grant requirement.

ELDER PROTECTION LAW

Sponsor: Jennifer Webster	Drafter: Grace Elliott	BC-07-08-26-B
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Purpose: Uphold the Nation's responsibility to honor and protect its elders. This law establishes a comprehensive framework to prevent, identify, report, investigate, and respond to elder abuse, neglect, self-neglect, and financial exploitation and affirms the Nation's cultural responsibility to honor, respect, and preserve elder wellbeing

Amendments:

- Establish a comprehensive framework to prevent, identify, report, investigate, and respond to elder abuse, neglect, self-neglect, and financial exploitation.
- Establish an Interdisciplinary Team composed of multiple Nation departments to coordinate case review, guide investigations, recommend actions, promote cooperation, and identify resources.
- Establish a duty to report suspected elder abuse, neglect, and exploitation. The law requires any person with knowledge or reasonable suspicion of abuse, neglect, self neglect, or exploitation of an elder to report immediately to Aging & Disability Services or the Oneida Police Department.
- Create a broad class of mandated reporters, including family, caretakers, elected officials, employees, healthcare workers, mental health professionals, social workers, law enforcement, judicial staff, and fiduciaries.
 - Good faith reporters receive immunity.
 - Non mandated reporters may remain anonymous.
- Establish civil penalties:
 - A mandated reporter who fails to report may be fined up to \$2,000.
 - Anyone who knowingly files a false report may be fined up to \$2,000.

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- Anyone who interferes with an investigation or retaliates against a reporter may be fined up to \$2,000 per occurrence.
- Provide investigation procedures requirements including that they must begin promptly and include required steps such as:
 - Visiting the elder's residence;
 - Observing the elder;
 - Conducting interviews;
 - Reviewing healthcare and financial records;
 - Interviewing guardians/caregivers;
 - Requesting law enforcement assistance;
 - Offering or arranging needed services.
- Authorize medical examinations under specified consent conditions or by court order.
- Authorize emergency protective actions, including protective placement, may be taken when necessary.
- Protect confidentiality and records. Departmental report forms and investigative records are confidential and may only be disclosed under limited circumstances, such as to the elder, suspect, service providers, law enforcement, auditors, and through court order.
- Provide that records must be retained for five years.
- Affirm elders' rights to:
 - Notice of an investigation unless emergency conditions exist.
 - Refuse services if they have capacity.
 - Protect their property rights, including the right to deny entry.
 - Representation by counsel at their own expense.
- Provide for rights of the accused to refuse services for themselves, refuse entry (subject to warrant), and obtain counsel at their own expense.
- Grant the Oneida Trial Court jurisdiction over all actions under this law. Personal jurisdiction extends to members of the Nation and Nation employees.

ELECTION LAW EMERGENCY AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-06-25-25-B
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Purpose: Governs the procedures for the conduct of orderly elections of the Nation, including pre-election activities such as caucuses and nominations.

Amendments:

- Reduce the number of Election Board members required to sign the election totals from six (6) to three (3).

Emergency Standard:

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- Necessary for the preservation of the general welfare of the Reservation population to ensure that the 2025 Special Election can occur in an efficient and lawful manner. The 2025 Special Election is scheduled for July 12, 2025. The number of Election Board members required to sign the election totals is being reduced from six (6) to three (3) due to the Election Board's concern that there will not be enough Election Board members to meet the original requirement for six (6) members. The Election Board has provided that they have not been able to secure an adequate number of alternate positions for the 2025 Special Election.
- Observance of the requirements under the Legislative Procedures Act for the adoption of the amendments to the Election law would be contrary to public interest and the process and requirements of the Legislative Procedures Act cannot be completed in time to allow the proposed emergency amendments to be adopted and implemented prior to the July 12, 2025 Special Election.

Emergency Expired:

- December 25, 2025

ELECTION LAW EMERGENCY AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-07-08-26-K
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Purpose: Governs the procedures for the conduct of orderly elections of the Nation, including pre-election activities such as caucuses and nominations.

Amendments:

- Reduce the number of Election Board members required to sign the election totals from six (6) to three (3).

Emergency Standard:

- Necessary for the preservation of the general welfare of the Reservation population to ensure that the 2026 General Election can occur in an efficient and lawful manner. The 2026 General Election is scheduled for July 11, 2026. The number of Election Board members required to sign the election totals is being reduced from six (6) to three (3) due to the Election Board's concern that there will not be enough Election Board members to meet the original requirement for six (6) members. The Election Board has provided that they have not been able to secure an adequate number of alternate positions for the 2026 General Election.
- Observance of the requirements under the Legislative Procedures Act for the adoption of the amendments to the Election law would be contrary to public interest and the process and requirements of the Legislative Procedures Act cannot be completed in time to allow

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the proposed emergency amendments to be adopted and implemented prior to the July 11, 2026 General Election.

Emergency Expired:

- January 8, 2027

EVICTIION AND TERMINATION LAW AMENDMENTS		
Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-07-08-26-J

Purpose: Provide consistent procedures for terminating a contract and/or evicting an occupant which affords the occupant due process and protects all parties involved.

Amendments:

- Add or revise the definition for Comprehensive Housing Division, law enforcement agency, occupant, owner, periodic tenancy, rental value, and stay of eviction.
- Expand who qualifies as an owner under the law from just the Nation to the Nation when the Nation is acting in its capacity as a lessor as defined in the Leasing law or lessee; or the Nation or any person or entity within the Nation’s jurisdiction acting in its capacity as a landlord as defined in the Landlord Tenant law.
- Revise the delegation of administrative rulemaking authority provided under this Law for the Nation’s residential, agricultural, and business contracts.
- Remove the terms “alleged” and “allegations” throughout the Law.
- Revise how notice of an early contract termination or eviction is provided to individuals and corporations or partnerships.
- Provide that an occupant shall have a right to cure for a failure to pay rent, but is not guaranteed that right to cure for subsequent violations.
- Clarify an occupant’s right to cure for instances of waste or contract breach by providing steps for remedying this type of breach, and also providing that the right to cure is not guaranteed for subsequent violations.
- Clarify what types of offenses qualify as a violation of law or rule or nuisance activity.
- Revise who is allowed to notice an owner of a violation of law or rule or nuisance activity.
- Clarify that an owner is not required to provide an occupant an opportunity to cure for a violation of an applicable law or rule or nuisance act.
- Clarify and expand when an individual may contest a contract termination.
- Revise how an occupant’s failure to vacate following the notice of eviction or a contract expiration is handled by an owner.
- Expand he amount of time allowed for an owner to return a security deposit to an occupant from thirty (30) days to sixty (60) days.
- Make other drafting changes and broad organizational changes.

Attachment 2.

HIGHER EDUCATION GRANT LAW

Sponsor: Jameson Wilson	Drafter: Grace Elliott	BC-04-22-26-F
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Purpose: Implement the Higher Education Grant program; and set forth the funding requirements and procedural controls for awarding Higher Education grants.

Amendments:

- Clearly articulate the Nation’s purpose and policy concerning the Higher Education Grant.
- Define key terms used within the law.
- Delegate rulemaking authority to the Higher Education Office to:
 - Clearly describe the documents required to complete the Higher Education Student File.
 - Address how funding periods are calculated.
 - Address funding cap amounts for the following tiers: associate degree, vocational or certificate program, undergraduate degree, graduate degree, doctoral degree,
 - Clearly describe application requirements and process.
 - Clearly describe the appeals process.
 - Additional rules may be promulgated, provided they do not conflict with any provision of this law.
- Clearly describe funding eligibility requirements, as follows:
 - be an enrolled member of the Nation.
 - be enrolled in an accredited postsecondary vocational program, college, or university
 - complete the Higher Education Student File with the Higher Education Office.
 - comply with FAFSA standards.
 - be pursuing a degree in a higher funding tier than any previously earned degree, unless they have remaining credits available under their current tier pursuant to 1005.5-2.
 - meet GPA requirements.
- Explicitly state funding duration as determined by the maximum allowable credit allocation per tier, as follows:
 - ninety (90) credits for an associate degree, vocational or certificate program.
 - one hundred fifty (150) credits for an undergraduate degree.
 - sixty (60) credits for a graduate degree.
 - one hundred twenty (120) credits for a doctoral degree.
- Define “probation” and clearly describe when a student may be placed on probation.
- Provide a clear explanation of how the grant award amount is calculated, as follows:
 - The minimum award package shall consist of:

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- Full-time students shall receive funding for tuition, fees, books, and room and board up to the funding cap amount for their program.
- Part-time students shall receive funding for tuition, fees, and books up to the funding cap amount for their program.
- Students taking one (1) to five (5) credits shall receive funding for tuition, fees, and books up to the funding cap for their program.
- If the student's financial need, as determined by the financial needs analysis, exceeds the minimum award package, the student shall receive an award equal to their financial need, up to the maximum allowed by the funding tier cap.
 - A full-time student's award may also cover transportation and personal/miscellaneous expenses.
 - A part-time student's award may also cover room and board, transportation and personal/miscellaneous expenses.
- Clearly describe how the law may be enforced.
- Clearly describe how a student may appeal a grant decision made by the Higher Education Office.

HUNTING, FISHING, AND TRAPPING LAW AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-01-14-26-B
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Purpose: Protect and conserve wildlife on the reservation and to promote respect among sportsmen, for both the environment and fellow sportsmen.

Amendments:

- Add a definition for descendant, great bodily harm, and warden.
- Eliminate the Environmental Resource Board (ERB) from the law and delegate all responsibilities of ERB provided in the law, except hearing authority, to the Conservation Department throughout the entire law.
- Require the Conservation Department draft rules that identify designated seasons and/or hunting hours for elder, disabled, and youth hunts.
- Eliminate the requirement that the Conservation Department draft rules establishing a process for retention, storage and disposal of items confiscated or turned over to the Department in accordance with this law.
- Require the Conservation Department draft rules that regulate the use of recovery and retrieval services and methods.
- Require the Conservation Department draft rules that regulate the care and husbandry of animals used to hunt or animals used for private game hunting.
- Eliminate the requirement that a rule booklet be provided to each person receiving a license permit.

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- Recognize that wardens fall within the organization of the Oneida Police Department and not the Conservation Department and therefore prescribe all responsibilities/duties of the wardens to the Oneida Police Department officers; and eliminate the requirement that an Oneida Police Department office who observes a violation of this law report it to a warden.
- Adds beaver to list of animals a landowner, lessee, or designee is allowed to hunt or trap on property they own or lease year round without a sportsman license, removing beavers from the list of nuisance animals that a person is not required to get a nuisance animal removal permit to hunt or trap.
- Eliminate the provision that allowed any licensee holding a fishing only sportsman license to name a designated hunter to fill the hunting or trapping permits that regularly accompany a sportsman license.
- Eliminate the requirement that at least eighty-five percent (85%) of the group and/or organization members be Tribal members for groups/organizations that seek a ceremonial and/or feast permit.
- Require that all persons participating in the ceremonial and/or feast hunt be tribal members, descendants, or a spouse of a tribal member in addition to the requirement that they be named hunters on the permit.
- Require that medical verification for a disabled hunter permit show that the physical disability results in mobility issues that makes it necessary for the disabled hunter to hunt from a stationary vehicle.
- Provide that any person who has had a license or permit denied in accordance with section 406.6-7(a) may appeal the Department's decision by requesting a hearing before the Trial Court instead of ERB.
- Provide that any person who accidentally collides with and kills a deer while operating a vehicle on a roadway, may retain possession of the said deer, provided that the person shall have the deer tagged by the State of Wisconsin, instead of the Department.
- Remove the requirement that the Department shall ensure that all hunting and fishing rule booklets contain a warning stating that fish caught in Duck Creek, as well as ducks, geese and other wildlife may contain Polychlorinated Biphenyl (PCBs) which may pose risks of health defects, that such risks are greatest for women and children, and that detailed information about PCBs is available from the Department upon request.
- Increase the allowable size of a hunting party from ten (10) to fifteen (15) persons.
- Allow designated hunters to hunt for an unlimited number of permittees, instead of being limited to the number authorized by the rules.
- Adjust the age restrictions for minors, now allowing all persons between the ages of ten (10) and fourteen (14) years old the ability to hunt if they have obtained the required license and permits and are under the immediate supervision of a parent, legal guardian, or a responsible adult to which a parent or legal guardian has delegated their supervisory responsibilities.

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- Allow individuals to obtain a mentored-only hunting license and permit and hunt without first completing a hunter education course as long as they accompany a mentor while hunting.
- Remove much of the provisions regarding citations, and simply providing that an individual who violates a provision of this law or the corresponding rules may be subject to the issuance of a citation by a warden or an Oneida Police Department officer in accordance with the Nation's laws and policies governing citations.

INDEPENDENT CONTRACTOR POLICY AMENDMENTS

Sponsor: Jonas Hill	Drafter: Carolyn Salutz	BC-01-28-26-E
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**Now Independent Contractors Law*

Purpose: Ensure proper classification of employees and independent contractors for federal labor and tax law purposes; ensure the use of contract forms approved by the Oneida Law Office and Purchasing; ensure contracting with a current employee does not create a conflict of interest or unintended tax consequences; and ensure independent contractors have appropriate insurance coverages.

Amendments:

- Rename the law from “Independent Contractor Policy” to “Independent Contractors Law.”
- Clarify in the definitions what it means to be an “employee” versus an “independent contractor.”
- Clarify in the definitions what it means to have the “scope of work”, including updated definitions of “deliverables” and “services.”
- Add in a requirement that the Nation must categorize all workers as either an independent contractor or an employee according to the Fair Labor Standards Act, Department of Labor regulations, the Internal Revenue Code, Treasury regulations, and the most current guidance from the Department of Labor and the Internal Revenue Service.
- Clarify the approval requirements for an independent contractor; including, contract, purchase order, vendor license, and tax identification number.
- Clarify when The Nation may contract with an employee or an employee-owned business entity as an independent contractor.

INVESTIGATIVE LEAVE POLICY AMENDMENTS

Sponsor: Marlon Skenandore	Drafter: Grace Elliott	BC-11-13-24-I
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**Now Investigative Leave Law*

Attachment 2.

Purpose: Set forth a process to address investigative leave for employees undergoing work-related investigations.

Amendments:

- Clarify the severity of an alleged violation that may warrant an investigative leave and provide examples.
- Clarify the type of risks that an investigative leave is intended to protect against.
- Prevent undue financial harm to an employee placed on investigative leave.
- Eliminate unpaid status for the employee placed on investigative leave for up to forty-five (45) days.
- Balance the intention to prevent undue financial harm to an employee placed on investigative leave with the Nation's fiscal responsibilities by shifting the employee to unpaid status when an investigation cannot be safely concluded within forty-five (45) days.
- Clarify that an employee may use their personal and vacation time if the investigative leave extends past forty-five (45) days.
- Provide that when an employee has used their personal and vacation time up all pay and benefits stop.
- Extend the authority to initiate an investigative leave to include the Executive Director of the Human Resource Department.
- Clarify that when there is no division director a supervisor must secure authorization from the person at the highest level in the chain of command under the Oneida Business Committee prior to placing an employee on investigative leave.
- Delegate the authority for designating the individual or agency responsible for completing the investigation to the Executive Director of the Human Resource Department and the supervisor, instead of the employee's supervisor and/or area manager.
- Delete the requirement that the Equal Employment Officer always conducts the investigation if the employee being investigated reports directly to the Oneida Business Committee and instead provide that they may also serve as a liaison to an investigating agency when that is more appropriate.
- Eliminate the option for a supervisor to place an employee in an alternate work assignment while on investigative leave.
- Expand the requirements that notice to the employee placed on investigative leave must contain.
- Extend the issuance of the second notice to the employee placed on investigative leave from fifteen (15) days to thirty-five (35) days.
- Clarify what information the second notice must provide the employee placed on investigative leave.
- Eliminate the requirement that a supervisor must conclude an investigation without waiting for the conclusion of a criminal or licensing matter.

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- Eliminate the requirement that an investigative leave must close upon the passing of fifteen (15) days, plus a possible extension of fifteen (15) days, unless an outside agency is conducting the investigation and instead allow the decision makers to close an investigative leave when a reasonable determination based on verifiable facts can be made.
- Expedite investigations by adding a requirement that the supervisor, or the EEO Officer (whichever is overseeing the investigation), provide the Executive Director of the Human Resource Department with weekly updates on the investigation.
- Eliminate the provision that requires the supervisor to conclude an investigation within forty-eight (48) hours of receiving the investigative report when someone else is conducting the investigation.
- Provide the employee who was placed on investigative leave with a redacted copy of the investigative report when requested, instead of only providing the redacted report to an employee who files an appeal.
- Require the supervisor to provide written notice and justification to the Executive Director of the Human Resource Department if they choose not to follow the corrective action recommended by the investigator(s).
- Expand an employee's responsibilities when on an investigative leave to include the surrender of all property of the Nation, respond to any inquires within twenty-four (24) business hours, and not share anything related to the investigation on social media.
- Create the option for an exception to be made to the complete prohibition of the employee who is placed on investigative leave entering any public worksite; if, and only if, it is determined that access is necessary, safe, appropriate, and the specific conditions under which access may be allowed are provided for in the notice to the employee.
- Require that the employee placed on investigative leave respond to all inquiries within twenty-four (24) business hours.

LANDLORD TENANT LAW AMENDMENTS		
Sponsor: Jonas Hill	Drafter: Grace Elliott	BC-06-25-25-C

Purpose: Provide mechanisms for protecting the rights of the landlords and tenants on all land owned by the Nation or members of the Nation within the Reservation boundaries.

Amendments:

- Expand the scope of the law to include all land owned by the Nation or members of the Nation within the Reservation boundaries instead of only to the Nation's rental programs.
- Expand the Nation's policy of providing a fair process to landlords and tenants of the Nation's rental programs to include all residents of the Nation.
- Expand the definition of landlord to include any person or entity within the Nation's jurisdiction, instead of limiting it to the Nation acting in its capacity as the landlord.

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- Redefine “rule” to grant rulemaking authority solely to the Comprehensive Housing Division instead of jointly to the Land Commission and the Comprehensive Housing Division. The Land Commission’s rulemaking authorities are eliminated as follows:
 - Naming programs and providing specific requirements and regulations that apply to said programs.
 - Disposition of personal property on Tribal land.
 - How and when rent shall be decreased due to untenability.
 - Governing the selection of applicants for the issuance of rental agreements.
- Remove rulemaking authority over applicant selection for the issuance of rental agreements from both the Land Commission and the Comprehensive Housing Division.
- Clarify that rental agreements shall state that nothing in the agreement may be considered a waiver of the Nation’s sovereign immunity when the Nation is acting in its capacity as a landlord.
- Clarify that all landlords or their staff must keep a written log of the date and the work time expended storing and/or removing personal property and/or removing debris left at the property after the expiration of the timeframe provided in the order to vacate.
- Remove language applying any section of this law to leases.
- Clarify that a landlord may bring an action for eviction when it is authorized by the Eviction and Termination law based on contacts with an entity for law enforcement services, health services, or safety services.
- Provide that when the Nation is the landlord, and a property has become untenable due to damage by fire, water or other casualty, or because of any condition hazardous to health, or if there is a substantial violation of 611.5-3(a) materially affecting the health and safety of the tenant, alternative housing shall be provided if it is reasonably available.
- Expand protections provided to a child of a tenant to a child of the household when the landlord is presented with documentation.

ONEIDA LIFE INSURANCE PLAN LAW AMENDMENTS		
Sponsor: Jameson Wilson	Drafter: Clorissa Leeman	BC-01-22-25-B

Purpose: Provide a death benefit through the Oneida Life Insurance Plan for all eligible enrolled Oneida Nation members, pursuant to the Oneida General Welfare law.

Amendments:

- Include an appeal section which provides that an individual designated as the beneficiary of a decedent who believes they were wrongfully denied benefits from the Oneida Life Insurance Plan by the Oneida Trust Enrollment Department may appeal the denial of benefits to the Oneida Trust Enrollment Committee, and subsequently any decision made

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by the Oneida Trust Enrollment Committee regarding the validity of the denial of benefits is final.

ONEIDA NATION LAW ENFORCEMENT ORDINANCE AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-05-24-25-B
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**Now Law Enforcement Law*

Purpose: Regulate the conduct of the Nation’s law enforcement personnel according to the highest professional standards.

Amendments:

- Revise the title of the law from “Oneida Nation Law Enforcement Ordinance” to “Law Enforcement law;”
- Include a new provision providing the policy of the Nation in regard to this law.
- Provide that law enforcement operations can take place outside the Reservation when the operations occur pursuant to any other jurisdictional exception that may exist for law enforcement officers.
- Remove the Police Sergeant position from the positions in the Oneida Police Department that are required to be held by enrolled members of the Nation.
- Require that upon the removal of a Police Chief, in addition to the retirement or resignation, the Oneida Public Safety and Security Commission shall appoint an interim Police Chief.
- Clarify that to the extent that Federal Tort Claims Act coverage does not apply, the Nation shall provide professional liability insurance for all law enforcement officers.
- Allow for the sworn oath of a law enforcement officer to take place at a special Oneida Business Committee meeting, or at an alternative time and location as determined by the Oneida Business Committee Secretary, in addition to at a regular Oneida Business Committee meeting.
- Expand the Oneida Police Commission into the Oneida Public Safety and Security Commission, which will oversee the Internal Security Department and any other public safety operation department of the Nation, in addition to the Oneida Police Department.
- Revise the eligibility qualifications for Oneida Public Safety and Security Commission members.
- Revise the responsibilities of the Oneida Public Safety and Security Commission in regard to the Oneida Police Department.
- Provide that the responsibilities of the Oneida Public Safety and Security Commission in regard to the Internal Security Department or any other safety operation department of the Nation shall be provided for in the Oneida Public Safety and Security Commission bylaws.
- Revise the disciplinary proceedings for law enforcement officers.

Attachment 2.

- Move all provisions regarding the use of firearms to section 301.11 of the Law, and provide that the Oneida Police Department may allow law enforcement use of service firearms in order to protect life, liberty, property, land, and premises, according to the usual and current accepted law enforcement standards.
- Make other minor drafting changes throughout the Law.

PARDON AND FORGIVENESS LAW AMENDMENTS		
Sponsor: Jennifer Webster	Drafter: Grace Elliott	BC-07-08-26-I

Purpose: Establish a fair, efficient, and formal process through which individuals may seek relief from certain barriers created by past actions.

Amendments:

- Create an exception allowing applicants with outstanding penalties/fines to proceed only if the application is for employment purposes and the applicant meets the requirements for a conditional waiver.
- Establish the full conditional waiver framework, including:
 - waiver applies only to employment eligibility;
 - outstanding penalties/fines remain fully enforceable;
 - mandatory payment agreement (18 months or extended to 3 years if >\$5,000);
 - requirements for Pardon and Forgiveness Committee recommendation;
 - good cause exception for missed payments;
 - grounds for rescission for non payment.
- Allow an applicant proceeding under the conditional waiver (employment only) to submit proof of a Pardon and Forgiveness Committee approved payment agreement instead of proof of full payment.
- Clarify that a pardon or forgiveness does not affect restrictions imposed under the Nation's Safe Neighborhoods law, in addition to existing sex offender requirements.
- Require the Oneida Secretary's Office to monitor payment-related conditions and provide quarterly reports to the Pardon and Forgiveness Committee; and clarify that monitoring is solely for eligibility enforcement, not decision-making.
- Authorize the OBC to rescind a pardon/forgiveness when a person fails to meet a payment condition under 126.6 3, with notice and a 30 day cure period; reinstates all prior ineligibilities. Includes subsections specifying:
 - rescission is an eligibility action, not an employment action;
 - notice must be issued per 126.10 4.

Attachment 2.

PROBATE LAW EMERGENCY ADOPTION

Sponsor: Jameson Wilson, Kirby Metoxen	Drafter: Grace Elliott	BC-04-22-26-E
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Purpose: To ensure the property of Decedents passes to the rightful heirs or beneficiaries; To comply with the Decedent's wishes as much as possible; To comply with tribal custom and tradition; To provide a simple, efficient, and inexpensive method for probating the Decedent's property; To prevent the transfer of land out of tribal ownership and control; and To ensure the rights of creditors of Decedents are protected to the extent possible and fair.

Amendments:

- Affirm tribal sovereignty over inheritance and probate by explicitly characterizing property disposition at death as an exercise of self governance and prioritizing tribal custom, tradition, and member control over property succession.
- Establishes a single, comprehensive tribal probate system governing how estates of covered decedents are administered, whether the decedent died with or without a will.
- Ensure tribal law controls over conflicting tribal documents and enactments, while recognizing that applicable federal law remains supreme where required.
- Apply beyond enrolled members to include spouses, children, persons eligible for enrollment, and deceased persons owning real property within Reservation boundaries subject to a residential lease with the Nation.
- Assert tribal jurisdiction over non trust property of covered decedents located within the Reservation, to the extent that federal law does not confer exclusive U.S. jurisdiction.
- Allow tribal members with fee land to opt into state probate law, while requiring tribal probate procedures for trust land held within the Reservation.
- Prohibit inheritance of trust land by non members and non U.S. citizens, preventing transfer of trust property outside the tribal community.
- Provide mitigation options for ineligible heirs by allowing sale of trust interests to the Nation or eligible heirs at fair market value, or by granting limited life estates to ineligible spouses or minor children.
- Authorize sale of interests where heirs cannot be located, with proceeds returned to the estate for proper distribution, reducing unresolved or fragmented ownership.
- Mandate escheat of property to the Oneida Nation where no valid heirs or devisees exist, directly supporting land consolidation and long term tribal control.
- Exempt culturally significant and low value personal items from formal probate, allowing family distribution of traditional and ceremonial property outside the probate process.
- Vest primary probate authority in the Land Commission, empowering it to determine heirs, approve or disapprove wills, adjudicate creditor claims, accept renunciations, and decree final distributions.

Attachment 2.

- Create a detailed probate procedural framework, including mandatory filings, notice requirements, public posting, and participatory consensus based hearings for dispute resolution.
- Codify a specific intestate succession hierarchy, prioritizing spouses and direct descendants and extending through parents, siblings, grandparents, and more remote relatives before escheat.
- Provide layered review, rehearing, and appeal rights, including administrative rehearings, judicial appeals, and limited reopening of cases for lack of notice or omission of heirs.

Emergency Standard:

- Necessary for the immediate preservation of the general welfare of the Reservation population. Recent amendments to the Real Property Law removed all probate provisions and the related delegation of rulemaking authority that Oneida had historically relied upon to administer estates. As a result, the Nation's clear legal authority and established process for handling probates were effectively eliminated. Historically, probate administration continued through temporary measures, most notably by resolution, which inserted a comprehensive stand in probate process into the Real Property Law when that law lacked sufficient procedural detail. By fully deleting probate provisions without the simultaneous adoption of a standalone probate law, the amendments created a gap in which Oneida would no longer have an express, workable legal framework to process probates, determine heirs, resolve disputes, or administer land succession. Emergency adoption of a separate Probate Law is therefore necessary to immediately restore tribal jurisdiction, authority, and an official probate process and to ensure that estates continue to be administered by Oneida rather than defaulting to state or federal systems.
- Observance of the requirements under the Legislative Procedures Act for the adoption of the Probate law would be contrary to public interest and the process and requirements of the Legislative Procedures Act cannot be completed in time to allow the proposed Probate law to be adopted and implemented to avoid losing jurisdiction over probate matters.

Emergency Expires:

- October 22, 2026

PUBLIC USE OF TRIBAL LAND LAW AMENDMENTS

Sponsor: Jonas Hill	Drafter: Clorissa Leeman	BC-01-28-26-D
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Purpose: Prevent improper access, use, and trespass to Tribal lands.

Amendments:

- Eliminate the Environmental Resource Board from the Law and delegate all their former responsibilities and duties to Land Management.

Attachment 2.

- Delegate administrative rulemaking authority to Land Management to develop rules to:
- Develop, approve, and maintain the Land Access Map.
- Allocate and assign land uses for all Tribal lands.
- Develop a fine and penalty schedule for violations of this Law and its corresponding rules;
- Develop any other rules needed to implement or enforce this Law.
- Require that Land Management consult with the Land Assessment Team on the development of all administrative rules.
- Add members of Haudenosaunee First Nations governments or bands to those who can access land designated as Oneida Community Access.
- Require that the Land Access Map be made digitally available on the Nation's website.
- Provide that Land Management is responsible for allocating and assigning land uses to all Tribal land.
- Remove the provisions on amending the Land Access Map, as the administrative rulemaking process shall now be followed.
- Remove the provisions of the Law regarding trespass.
- Remove much of the provisions regarding citations, and simply providing that an individual who violates a provision of this law or the corresponding rules may be subject to the issuance of a citation by a warden or an Oneida Police Department officer in accordance with the Nation's laws and policies governing citations.

REAL PROPERTY LAW AMENDMENTS		
Sponsor: Jameson Wilson	Drafter: Grace Elliott	BC-04-22-26-B

Purpose: Provide regulations and procedures for the transfer, control and management of all Tribal land; and to integrate these regulations and procedures with the real property laws and practices of other federal and state sovereigns which may hold concurrent jurisdiction.

Amendments:

- Uphold the Nation's prohibition on the sale of Tribal land, while establishing one new, narrowly tailored exemption for certain off-Reservation transactions as follows: Sale of land located off the Reservation provided the transaction is approved by formal resolution of the Oneida Business Committee.
- Remove the definitions for terms related to probate that are not applicable under the proposed amendments. Specifically eliminate the following definitions: Broker, Estate, Fiduciary, Guardian ad litem, Personal representative and Probate.
- Add or modify definitions for the following terms: Deed, Easement, Individual trust land, Land Management, Land use license, Restricted fee status, Rule, Senior management, Title status report, and Title report.
- Clarify that the Nation's exercise of eminent domain is limited to a right of last resort. [

Attachment 2.

- Provide that any party contesting the Nation's authority to exercise eminent domain, or disputing the adequacy of consideration offered, may challenge the acquisition by filing a civil complaint with the Oneida Nation Trial Court.
- Reinstate trespass provisions previously contained in the Public Use of Tribal Land law.
- Add enforcement provisions similar to those contained in the Public Use of Tribal Land law.
- Authorize officers of the Oneida Police Department or designated wardens to take any action necessary to prevent, mitigate, or remove violations of this Law, require proof of eligibility to access Tribal land, issue citations, and enforce any order not complied with at the expense of the owner.
- Provide that an individual who violates this law may be issued a citation; a citation may include fines, other penalties, and conditional orders as determined by the Trial Court.
- Specify that the Oneida Nation Register of Deeds shall provide public access to land records and title documents, subject to applicable fees outlined in the fee schedule established by Land Management and approved by the Land Commission.
- Streamline authority and improve operational efficiency within Land Management and the Comprehensive Housing Division by eliminating overlapping responsibilities currently held by the Land Commission. The Land Commission will no longer review and adopt Land Management's standard operating procedures for agriculture and commercial leases in accordance with the Leasing law.
- Delegate exclusive rulemaking authority to the Comprehensive Housing Division for establishing process requirements such as advertising, notice, prequalification, and selection- applicable to all residential improvements sales by the Nation.
- Delegate rulemaking authority to Land Management under the Administrative Rulemaking law to:
 - Establish a fine and penalty schedule for violations.
 - Create any additional rules necessary to implement or interpret this law.
 - Ensure all rules are approved by senior management before submission to the Legislative Operating Committee pursuant to the Administrative Rulemaking law.
- Designate Land Management as the entity responsible for:
 - Managing the Tribal land portfolio and acting as the caretaker of unassigned lands.
 - Entering into and administering agricultural and commercial leases pursuant to the Leasing and Eviction and Termination laws.
 - Processing requests for easements and land use licenses.
 - Administering internal building and land assignments to Nation entities, as approved by senior management.
 - Handling transactions that add real property to the Tribal land base.
 - Preparing and maintaining title reports and accurate land records.

Attachment 2.

- Providing real estate services for individual trust landowners under the self-governance compact, including document submission to the Bureau of Indian Affairs.
- Compiling, and submitting the Nation's fee-to-trust applications in accordance with the priorities set by senior management.
- Determining which Tribal lands require posting and ensuring appropriate signage is installed.
- Remove the provisions of the Law regarding probate.
- Establish the legal framework for granting easements in specific circumstances where access to property is restricted. Three types of easements are outlined:
 - Easement by Necessity, which allows landlocked property owners to petition the Oneida Judiciary for access through adjacent land, provided they can prove the parcels were once under common ownership and the landlocked condition resulted from a severance.
 - Prescriptive Easement, which permits individuals to seek continued use of land if they've used it openly, adversely, and continuously for twenty (20) years.
 - Easement by Written instrument which recognizes property rights acquired through uninterrupted adverse possession over seven years.
 - Additionally, it protects Tribal land from unauthorized claims, by prohibiting adverse possession claims against the Nation.
- Increase the minimum number of Land Management employees primarily responsible for real estate acquisitions from one (1) to two (2), contingent upon budgetary resources.

RECYCLING AND SOLID WASTE DISPOSAL LAW AMENDMENTS		
Sponsor: Kirby Metoxen, Jonas Hill	Drafter: Carolyn Salutz	BC-04-22-26-C

**Now Solid Waste Disposal Law*

Purpose: Set forth the process by which the Nation will reduce, manage, and dispose solid waste within the jurisdictional boundaries of the Nation.

Amendments:

- Rename the law from "Recycling and Solid Waste Disposal" to "Solid Waste Disposal Law."
- Remove the separation of "recycling" and "solid waste" and instead redefine solid waste to include recyclable materials
- Clarify in the definitions the following terms: "customers," "e-waste," "major appliances," "reservation," "service provider," and "sharps."

Attachment 2.

- Clarify the management of solid waste within the Reservation will be governed by this law, the Nation's Sustainable Materials Management Plan, and applicable provisions of the Resource Conservation and Recovery Act.
- Clarify that the Nation's Division of Public Works ("DPW") and Land, Environmental, Agriculture, and Food ("LEAF") have the authority to administer certain provisions of this law, including informing the public of certain requirements, determining nuisances, procuring service providers, and making rules for the regulation and administration of this law.
- Clarify there will be a fine and penalty schedule developed by DPW and LEAF and approved by the Oneida Business Committee.
- Clarify certain items need to be separated; LEAF, or the service provider may refuse pick up; and there will be a special collection of some items which will be scheduled annually and posted on the Nation's website.
- Clarify that deer carcasses and other large animal carcasses are not collectable and may not be place for curbside collection.
- Clarify it is prohibited to burn solid waste, dump, throw, or leave solid waste in unauthorized areas, in any way that creates a nuisance, or in any way that violates the Sustainable Materials Management Plan, other provisions of the Recycling and Solid Waste Disposal Law, the Public Peace Law, or any other law of the Nation.

SAFE NEIGHBORHOODS LAW EMERGENCY ADOPTION		
Sponsor: Jameson Wilson	Drafter: Clorissa Leeman	BC-02-25-26-C

Purpose: Not to impose a criminal penalty but rather to serve the Nation's compelling interest to promote, protect, and improve the health, safety, and welfare of the reservation population by prohibiting convicted sex offenders from loitering or residing in specified areas around locations where vulnerable populations, including children, regularly congregate.

Amendments:

- Prohibit a sex offender from being present or entering into specified prohibited locations, that are primarily focused on areas in which children are known to congregate, while also providing exceptions for when a sex offender may enter a prohibited area.
- Prohibit a sex offender from establishing a permanent residence or temporary residence within two thousand five hundred (2,500) feet of any prohibited location, while also providing exceptions for when a sex offender may have a residence less than two thousand five hundred (2,500) feet of any prohibited location.
- Prohibits a person or entity from selling, leasing, subleasing, renting, conveying, or otherwise allowing a sex offender to stay in any place, structure, or part thereof with

Attachment 2.

knowledge that it will be used as a permanent residence or temporary residence by any sex offender that is prohibited from establishing residence under this law.

- Provide a process to allow a sex offender to petition for a waiver of the residence restriction to the Oneida Police Department Chief of Police, and then appeal a denial of a waiver to the Oneida Public Safety and Security Commission.
- Requires the Geographic Information System Department to develop and maintain an official map of the reservation showing prohibited locations and the resulting residency restrictions distances that is made available on the Nation's website.
- Provide for the enforcement of violations of this Law and subsequent penalties that are available.

Emergency Standard:

- Necessary for the immediate preservation of the safety and general welfare of the Reservation population. Sex offenders are a serious threat to the public safety of vulnerable populations, including children, if regulatory measures are not in place that protect the community by reducing opportunity and temptation by prohibiting sex offenders from being present on or residing in specified areas designated as places where vulnerable populations commonly congregate.
- Observance of the requirements under the Legislative Procedures Act for the adoption of the Safe Neighborhoods law would be contrary to public interest and the process and requirements of the Legislative Procedures Act cannot be completed in time to allow the proposed Safe Neighborhoods law to be adopted and implemented in time to best protect the community.

Emergency Expires:

- August 25, 2026

SAFE NEIGHBORHOODS LAW EMERGENCY ADOPTION EXTENSION

Sponsor: Jameson Wilson	Drafter: Clorissa Leeman	BC-08-12-26-B
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Purpose: Not to impose a criminal penalty but rather to serve the Nation's compelling interest to promote, protect, and improve the health, safety, and welfare of the reservation population by prohibiting convicted sex offenders from loitering or residing in specified areas around locations where vulnerable populations, including children, regularly congregate.

Amendments:

- Prohibit a sex offender from being present or entering into specified prohibited locations, that are primarily focused on areas in which children are known to congregate, while also providing exceptions for when a sex offender may enter a prohibited area.

Attachment 2.

- Prohibit a sex offender from establishing a permanent residence or temporary residence within two thousand five hundred (2,500) feet of any prohibited location, while also providing exceptions for when a sex offender may have a residence less than two thousand five hundred (2,500) feet of any prohibited location.
- Prohibits a person or entity from selling, leasing, subleasing, renting, conveying, or otherwise allowing a sex offender to stay in any place, structure, or part thereof with knowledge that it will be used as a permanent residence or temporary residence by any sex offender that is prohibited from establishing residence under this law.
- Provide a process to allow a sex offender to petition for a waiver of the residence restriction to the Oneida Police Department Chief of Police, and then appeal a denial of a waiver to the Oneida Public Safety and Security Commission.
- Requires the Geographic Information System Department to develop and maintain an official map of the reservation showing prohibited locations and the resulting residency restrictions distances that is made available on the Nation's website.
- Provide for the enforcement of violations of this Law and subsequent penalties that are available.

Emergency Standard:

- Extension of emergency adoption necessary for the immediate preservation of the safety and general welfare of the Reservation population. Sex offenders are a serious threat to the public safety of vulnerable populations, including children, if regulatory measures are not in place that protect the community by reducing opportunity and temptation by prohibiting sex offenders from being present on or residing in specified areas designated as places where vulnerable populations commonly congregate.
- Observance of the requirements under the Legislative Procedures Act for the adoption of the Safe Neighborhoods law would be contrary to public interest and the process and requirements of the Legislative Procedures Act cannot be completed in time to allow the proposed Safe Neighborhoods law to be adopted and implemented in time to best protect the community.

Emergency Expires:

- February 25, 2026

SANCTIONS AND PENALTIES LAW

Sponsor: Jennifer Webster	Drafter: Clorissa Leeman	Rejected at 1/5/26 GTC
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Purpose: Establishes a consistent set of sanctions and penalties that may be imposed upon elected officials of the Nation for misconduct in office for the purpose of providing an opportunity for the official to take corrective action to address the misconduct and promote accountability and improved performance of the official.

Attachment 2.

Amendments:

- Require an official of the Nation to behave in a manner that promotes high standards of conduct.
- Subject an official of the Nation to sanctions and penalties for behaving in a manner that constitutes misconduct, which is defined as:
 - a violation of the Constitution or any of the Nation's laws, policies, or rules;
 - a violation of the bylaws, standard operating procedures or other internal operating documents that govern the entity upon which the official serves; and
 - a conviction of a felony, or any crime in any jurisdiction that would be classified as a felony under federal law or Wisconsin law.
- Provide a process for filing a complaint, including:
 - who may file a complaint;
 - when a complaint may be filed;
 - where a complaint may be filed; and
 - the necessary contents of a complaint.
- Prohibit retaliation against any individual who makes a complaint, is a witness to a complaint, or offers testimony or evidence.
- Delegate the responsibility to handle complaints alleged against an official to the Trial Court.
- Require all complaints alleged against an official to be handled in a confidential manner.
- Allow for an individual to appeal the decision of the Trial Court to the Nation's Court of Appeals.
- Provide various sanctions and penalties that may be imposed against an official.
- Provide factors to be used by the Trial Court when determining the appropriate sanctions and/or penalties to impose.
- Clarify that the imposition of sanctions or penalties does not exempt an official from individual liability for the underlying misconduct, and does not limit any penalties that may be imposed in accordance with other laws.
- Discuss the effect of a resignation by an official.
- Require that Judiciary maintain a record of conduct in office for each official.

VEHICLE DRIVER CERTIFICATION AND FLEET MANAGEMENT LAW AMENDMENTS

Sponsor: Jameson Wilson	Drafter: Clorissa Leeman	BC-09-25-24-B
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Purpose: Establish standards that certify employees, elected and appointed officials, and volunteers to drive a fleet vehicle or personal vehicle on official business and regulate the use of all vehicles owned and leased by the Nation.

Attachment 2.

Amendments:

- Remove the responsibility of the Fleet Management Department to purchase fleet vehicles.

WORKPLACE VIOLENCE LAW AMENDMENTS

Sponsor: Jennifer Webster	Drafter: Carolyn Salutz	BC-01-14-26-A
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Purpose: Provide all Oneida Nation employees and visitors an environment that is free of violence and the threat of violence.

Amendments:

- Clarify that this law applies to all employees, during or outside of any employee's normal work hours and as long as the alleged incident of workplace violence occurs in a setting reasonable connected to the workplace.
- Clarify what constitutes "prohibited behaviors."
- Clarify exceptions to "prohibited behaviors."
- Require that all complaints and investigations of alleged workplace violence be directed to and handled by the Equal Employment Opportunity Department ("EEO") within the Oneida Nation Human Resources Department ("HRD").
- Clarify that there will be a "final decision" which is the ultimate decision issued from the EEO Department, the Nation's Human Resources Executive Director, and the employee's supervisor regarding the allegation and investigation of the incident of workplace violence.
- Clarify the responsibilities of the EEO Department. The EEO Department will be responsible for assigning an EEO Officer who will investigate the complaint and be responsible for determining the final decision along with the Nation's Human Resources Executive Director and the employee's supervisor.
- Clarify that the EEO Department and the Nation's Human Resources Department are responsible for communicating and sharing information with each other to ensure all complaints and investigations are properly and timely handled.
- Clarify that verbal complaints are acceptable but whichever department receives the verbal complaint should direct that employee to submit a written complaint to the EEO Department.
- Clarify the reporting of restraining orders and injunctions – when reporting is mandatory and when it is discretionary.
- Clarify employment eligibility for employees who resign during a workplace violence investigation or are terminated as a result of a workplace violence investigation.

Adopt Real Property Law - Chapter 601 - Rule No. 3 - Easements Amendments

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the Real Property Law Rule No. 3 – Easements Amendments.

4. Areas potentially impacted or affected by this request:

☐ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☐ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

To: Legislative Operating Committee
From: Eric McLester, Division Director *EMc*
Date: August 3, 2026
Re: Easement Rule #3 Amendments

A Public Meeting notice was published in the June edition of the Kalihwisaks (see attached). As stated on the notice, the Public Meeting was held on June 15, 2026 at 1:15 P.M. in the Land Management Conference Room, 470 Airport Drive, Oneida.

There were 3 staff members present and no guests attended. A copy of the sign in sheet is attached as well.

The Public Meeting comment period was open until June 25th. There were no submissions received.

A copy of the Summary Report, Financial Analysis and redline version of the existing rule are attached to this memo.

The existing rule was effective on 2/26/2025. Please advise if there is additional information needed.



Oneida Land Commission

Regular Meeting
5:00 p.m. Monday, December 22, 2025
Little Bear Conference Room & Microsoft Teams

Minutes

Present: Chair Sidney White, Vice Chair Frederick Muscavitch, Secretary Gina Powless-Buenrostro, Commissioners: Patricia Cornelius, Tina Danforth, Donald McLester.

Excused: N/A

Arrived at: N/A

Others Present: Brooke Doxtator, Victoria Flowers (Teams), Lauren Hartman (Teams), Sheila Huntington (Teams), Krystal John (Teams), Eric McLester, Diane Wilson;

I. CALL TO ORDER AND ROLL CALL

Meeting called to order by Chair Sidney White at 5:00 p.m.

II. ADOPT THE AGENDA

Motion by Patricia Cornelius to adopt the agenda with one addition [1) IX.D.4. Fee to Trust Priorities], seconded by Donald McLester. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

III. TASK LIST

- A. New York Land
 - 1. Hunting
 - 2. Eminent Domain
- B. Realtor Backup
- C. Developer Agreement
- D. Hudson Road
- E. Add Zero Dollar Lease Criteria
- F. Monthly Meeting Amendment
- G. Research on Executive Session Actions
- H. OLC Trainings:
 - 1. January 14, 2026 @ 1:00 p.m.
 - 2. February 11, 2026 @ 1:00 p.m.
 - 3. March 11, 2026 @ 1:00 p.m.
- I. OLC Probate Hearings:
 - 1. January 26, 2026 @ 3:15 p.m.
 - 2. February 23, 2026 @ 3:15 p.m.
- J. First-time Home Ownership Report – CHD to provide in January
- K. Auction Standard Operating Procedure – provide at end of January

IV. READING OF MINUTES**A. Approve the December 10, 2025, regular Oneida Land Commission meeting minutes**

Sponsor: Gina Powless-Buenrostro

Motion by Patricia Cornelius to approve the December 10, 2025, regular Oneida Land Commission meeting minutes with the correction to Sid and Gina being in person and the 1st training only being half completed, seconded by Donald McLester. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

V. TABLED BUSINESS**VI. OLD BUSINESS****VII. NEW BUSINESS****A. Approve easement rule for further legislative processing**

Sponsor: Diane Wilson

Motion by Gina Powless-Buenrostro to approve the easement rule for further legislative processing, seconded by Donald McLester. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

For the record: Gina Powless-Buenrostro wants noted that the tribe is working on a new inter-governmental agreement that would put us in a better position to work with other municipalities to get utilities onto our land.

VIII. REPORTS (FY-25 DEADLINES Q1-FEB 4, SEMI-ANNUAL-APR, Q2-MAY 6, Q3-AUG 5, ANNUAL-OCT, Q4-NOV 4)

Motion by Donald McLester to go into executive session at 5:21 p.m., seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

Motion by Gina Powless-Buenrostro to come out of executive session at 6:59 p.m., seconded by Donald McLester. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

IX. EXECUTIVE SESSION**A. PROBATES****B. LEASES****1. Determine next steps regarding Commercial Lease File # 10202501C**

Sponsor: Sheila Huntington

Motion by Gina Powless-Buenrostro to approve the Commercial Lease for File # 10202501C Triple Net for the Lamar Companies to lease for a 3-year term beginning January 1, 2026, and ending December 31, 2028, with their rent of [REDACTED] annually plus 15% of the sales and an option for an additional 3-year term with an increase to the following CPI or [REDACTED] increase whichever is greater, with the corrections contingent on a legal review with the Oneida Law Office, seconded by Tina Danforth. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

C. ACQUISITIONS**1. Accept Land Acquisition Summary Report**

Sponsor: Lauren Hartman

Motion by Gina Powless-Buenrostro to accept the Land Acquisition Summary Report, seconded by Donald McLester. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

2. Approve Final Report for File # 072501V

Sponsor: Lauren Hartman

Motion by Donald McLester to approve the Final Report for File # 072501V, correcting the property type from commercial to residential, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

3. Approve Final Report for File # 072509R

Sponsor: Lauren Hartman

Motion by Donald McLester to approve the Final Report for File # 072509R, correcting the property type from commercial to residential and the acreage to 0.588, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

4. Determine next steps regarding File # 122514C

Sponsor: Lauren Hartman

Motion by Tina Danforth to [REDACTED] for the residential parcels B, C, D, and E only, seconded by Gina Powless-Buenrostro. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

5. Determine next steps regarding File # 122520A

Sponsor: Lauren Hartman

Motion by Gina Powless-Buenrostro to request more information (agricultural lease, residential lease, right of first refusal and any other pertinent information) regarding the history and defer File # 122520A to the next meeting, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

D. DISCUSSION**1. Real Property Law Amendments**

Sponsor: Frederick Muscavitch

Motion by Gina Powless-Buenrostro to request the Boards, Committees and Commissions Supervisor to request an invite to the LOC work meetings regarding the Real Property Law, seconded by Frederick Muscavitch. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

Motion by Gina Powless-Buenrostro to request the Attorney Krystal John to determine if she has a conflict of interest regarding filing a declaratory order for the Oneida Land Commission and to provide a response in writing including the basis for her response, seconded by Tina Danforth. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

Motion by Gina Powless-Buenrostro that the response from Krystal John be included on the agenda at the next meeting, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

2. Confidential Items

Sponsor: Frederick Muscavitch

Motion by Gina Powless-Buenrostro to request the Director to bring back a proposal for Land Acquisition Manager or Trainee to the next meeting, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

3. Other

Sponsor: Frederick Muscavitch

Motion by Frederick Muscavitch to request the Director budget for OLC travel and training for \$10,000 for FY26, seconded by Patricia Cornelius. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch

Motion by Frederick Muscavitch to authorize Tina Danforth to call Chairman Tehassi Hill to find out what is going on with the New York properties, seconded by Gina Powless-Buenrostro. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

4. Fee to Trust Priorities

Sponsor: Eric McLester

Motion by Gina Powless-Buenrostro to direct the Director, Eric McLester, to bring back options (ex. homeownership, vacant, home rent, longest lease, location, cost) to the 2nd meeting in January, seconded by Frederick Muscavitch. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

X. ADJOURNMENT

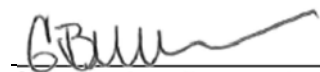
Motion by Donald McLester to adjourn at 7:23 p.m., seconded by Gina Powless-Buenrostro. Motion carried:

Ayes: Patricia Cornelius, Tina Danforth, Donald McLester, Frederick Muscavitch, Gina Powless-Buenrostro

Roll call for the record:

Present: Chair Sidney White, Vice Chair Frederick Muscavitch, Commissioners: Patricia Cornelius, Tina Danforth, Donald McLester, Gina Powless-Buenrostro

Minutes prepared by Brooke Doxtator, Boards, Committees, and Commissions Supervisor.
Minutes approved January 14, 2026.



Gina Powless-Buenrostro, Secretary
Oneida Land Commission

Summary Report for Easement Rule 3 Amendment

Original effective date: 02-26-2025

Amendment effective date: tbd

Name of Rule: Easements

Name of law being interpreted: Real Property

Rule Number: 3

Other Laws or Rules that may be affected: none

Brief Summary of the proposed rule: Exclusion of application and processing fee for easements in Oneida developments and in title clean up situations.

Revision of language in processing individual trust property easements regarding the release of ownership information to requestor. Oneida realty staff is to be the agent for the individual trust owner in compliance with Self Governance compact with Bureau of Indian Affairs.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them.*

The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.



Title 6. Property and Land Real Property – Chapter 601 Rule #3 – Easements

- 3.1 Purpose and Authority
- 3.2 Adoption, Amendment and Repeal
- 3.3 Definitions
- 3.4 Scope and Application
- 3.5 Requests for Easements on Tribal Land
- 3.6 Oneida Land Commission Preliminary Review
- 3.7 Land Commission Final Review
- 3.8 Easement Administration
- 3.9 Requests for Easements on Individual Trust Land
- 3.10 Recording Easements in ONROD

3.1 Purpose and Authority

3.1-1. *Purpose.* To provide procedures for granting easements over, under and across tribal lands in order to best protect the interests of the Oneida Nation. In addition, because the Nation is a self-governance Nation, this rule also addresses how Land Management facilitates the processing of easements on individual trust land.

3.1-2. *Authority.* The Real Property Law delegates rulemaking authority to the Environmental, Land, and Agriculture Division¹ and Land Commission pursuant to the Administrative Rulemaking law.

3.2 Adoption, Amendment and Repeal

3.2-1. This rule was adopted by the Land Commission in accordance with the procedures of the Administrative Rulemaking law.

3.2-2. This rule may be amended or repealed by the Environment, Land, and Agriculture Division and Land Commission pursuant to the procedures set out in the Administrative Rulemaking law.

3.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

3.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

3.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to easements.

3.3 Definitions

3.3-1. This section shall govern the definitions of words and phrases used within this rule provided that the definition section of the Real Property law shall also apply hereto. All words not defined herein shall be used in their ordinary and everyday sense.

(a) *Affidavit of Completion.* Means a legal document certifying as to the completion of

¹ The delegation of authority in the law was to Land Management and the Land Commission, however, since the law was adopted, Land Management has been rolled into a larger division, the Environmental, Land, and Agriculture Division, of which Land Management is now a department without separate management from the Division.

construction as related to the easement that acknowledges any known deviations from stated plans, permits or other approvals.

(b) *Applicant*. Means the third party requesting use of the Nation's land when requesting an easement on tribal land and means the individual trust land owner when an individual trust land owner is requesting BIA approval of an easement on their individual trust land.

(c) *AVSO*. Means the Appraisal and Valuation Services Office which is the federal administration within the Department of Interior charged with approving and conducting appraisals on federal land to ensure federal land transactions meet applicable fair market value consideration requirements.

(d) *Appraisal*. Means an expert assessment of the value of a requested easement based on the terms of a proposed easement.

(e) *BIA*. Means the Bureau of Indian Affairs, which is the federal administration within the Department of Interior charged with overseeing the government's trust responsibilities to indigenous governments and their citizens.

(f) *Easement Negotiation Summary Form*. Means the form used to aid the Land Commission in arriving at easement request decisions which, at a minimum, includes the appraised value of the easement, the legal description and map produced as a result of the survey, the offered consideration and the date Land Commission approved the easement use along with an excerpt of said meeting minutes.

(g) *Engineer's Affidavit*. Means a legal document completed by a licensed engineer that certifies a legal description provided in a survey document is accurate.

(h) *Grantee*. Means the recipient of an easement on tribal land in accordance with this Rule.

(i) *Internal Entity*. Means an entity of the Nation operating under the direction of the Oneida Business Committee and within the management structure of the Nation.

(j) *Organization*. Means a body of people with a particular purpose, especially a business, other local government or association.

(k) *Servient Property*. Means the parcel of land that is subject to an easement that benefits another parcel of land.

(l) *Survey*. Means a document that measures and records the boundaries, elevation levels and unlesangles of a parcel of land.

(m) *Surveyor's Affidavit*. Means a legal document completed by a licensed surveyor that certifies a legal description provided in a survey document is accurate.

3.4 Scope and Application

3.4-1. *General Applicability*. The requirements of this rule shall apply to all requests for easements on tribal land and to all individual trust land owners' requests for BIA approval of easements on individual trust land located within the Oneida Nation reservation except that this rule shall not apply to:

(a) *Service Line Agreements*. The requirements of this rule shall not apply to utility service line agreements to cross or access the Nation's property for the purpose of connecting a landowner's property to the main utility line. Service line agreement templates shall be reviewed and approved by the Oneida Law Office, for legal contract review, and the Oneida Land Commission, for content approval, on an annual basis. Land Management staff are authorized to execute service line agreements using approved templates without seeking Oneida Law Office or Oneida Land Commission review and

approval of individual service line agreements provided that no revisions are made to the template document; if any revisions are made to the template document, the Oneida Law Office and Oneida Land Commission must provide their respective reviews and approvals before Land Management may execute the agreement. Land Management shall submit all service line agreements affecting tribal trust land to the BIA for filing in the Land Title and Records Office.

(b) *Internal Entity Easement Requests.* Internal requests will not be granted official easement documents provided that, if any internal entity easement request is approved by Oneida Land Commission, the granted easement must be platted on a recorded survey and registered in the Geographic Land Information System (GLIS), to the extent capable.

3.5 Applications for Easements on Tribal Land

3.5-1. *Application Form.* Applicants shall submit requests for easements using the Tribal Land Easement Request Form available on Land Management's website, at a minimum the form shall:

- (a) Notice the requestor that there is a twenty dollar (\$20) application fee for all applications;
- (b) Notice the requestor that there is a one hundred dollar (\$100) processing fee for easement applications received from individuals and a five hundred (\$500) for organizations that receive preliminary approval from the Land Commission pursuant to section 3.6;
- (c) Ask what requested use is and which parcels it affects;
- (d) Ask the requested duration of the requested use;
- (e) Ask the requested method of communication with applicant noting a preference for email communication; and
- (f) Ask whether there is a preliminary offer of consideration for the easement or a request for waived consideration.

~~(f)(g)~~ *Note that fees are waived for easements needed for development and/or title clean up driven by the Nation.*

3.5-2. Upon receipt of an easement application, Land Management shall:

- (a) Send the request to the Land Assessment Team established in the LANDBAC Rule for feedback. The team members shall have five (5) business days to submit feedback.
- (b) Order a title report for the affected parcel.
- (c) Upon the close of the feedback period, prepare a recommendation explaining whether Land Management recommends Land Commission grant the easement for the requested use and duration for the consideration presented, or requested to be waived.
- (d) Submit Land Management's easement recommendation to the next available Oneida Land Commission agenda along with all feedback from the Land Assessment Team.
- (e) Provide the applicant with a copy of Land Management's recommendation and the date the recommendation will be the Land Commission agenda date with notice that Land Management will inform the applicant of the Oneida Land Commission's decision within five (5) business days of the meeting date.

3.6 Land Commission's Preliminary Review

3.6-1. *Land Commission Easement Decision.* When Land Management's easement recommendation is presented to Land Commission, the Land Commission shall:

- (a) Approve or deny the recommendation with regard to the requested use;
 - (b) Approve or deny the recommendation with regard to ~~the~~ the requested use duration;
- and

(c) Approve or deny the recommendation with regard to the requestor's proposed consideration. Specifically, if Land Commission wishes to waive the requirement for an appraisal and accept the offered consideration, Land Commission must inform Land Management at this meeting. If the use and duration are approved, then Land Management shall proceed with processing the application and collect the processing fee.

3.6-2. *Notice of Easement Decision.* Land Management shall notify the Applicant of the Land Commission's decisions concerning the easement request within five (5) business days of the Land Commission's meeting date.

(a) *Notice of Easement Decision Letter.* Land Management shall draft Notice of Easement Decision Letter for applicants that explains the decisions made by the Oneida Land Commission.

(1) If the land commission approved proceeding, the letter shall also include:

(A) Notice the applicant that the Applicant is responsible for all survey and appraisal costs and that survey and appraisal costs, regardless of whether an easement is ultimately granted or not;

(i) *Survey.* A survey is required to determine the correct legal description for the easement and that there are specific surveying requirements applicable to trust land. The legal description generated shall be confirmed in an Engineer's Affidavit or a Surveyor's Affidavit submitted to Land Management. Land Management shall advise whether a Land Use License is required to allow the applicant to complete the survey.

(ii) *Appraisal.* Land Management shall notice the applicant that Land Commission will not accept consideration offers for less than the full appraised value plus fifteen percent (15%) for any requested use that does not directly benefit the Oneida Nation and/or its citizens. For fee land, the Applicant may use any appraisal company to complete the appraisal, provided that, the Nation may elect to procure a competing appraisal for the purpose of price negotiation. The Nation orders appraisals on trust land. Land Management shall draft a scope of work to be submitted to the United States Department of Interior, Appraisal and Valuation Services Office for approval. When the scope of work is approved, Land Management shall order an appraisal from an appraiser qualified to perform appraisals on federal land. When the appraisal is received, Land Management shall forward the appraisal to ~~the applicant and~~ the Department of Interior AVSO for approval and forwarding to BIA.

(B) Land Management shall notice the applicant that Land Commission will not accept consideration offers for less than the full appraised value plus 15% for any requested use that does not directly benefit the Oneida Nation and/or its citizens;

(C) Notice that a Land Use Permit will be required from the Oneida Zoning Department and contact information for said department;

(D) If trust land, the BIA easement application documents;

(E) If the applicant is an organization and not an individual, notice that the applicant must submit:

(i) Organizational documents and by-laws;

- (ii) Evidence of Authority of Officers to Execute Papers form;
- (F) Notice that an an Affidavit of Completion is required to be submitted when the work is complete.

3.7 Land Commission Final Review

3.7-1. *Land Management Preparation for Land Commission.* When the required documents are returned to Land Management in accordance with the noticed requirements, then Land Management shall:

- (a) *Draft Easement.* If the easement is on trust land, send the applicant the BIA template easement and inform the applicant that revisions may not be requested to the template. If the easement is on fee land, then Land Management shall prepare the draft easement using the Oneida Easement Template approved by the Oneida Land Commission.
- (b) *Consideration Confirmation.* If Land Commission has not approved a waiver of consideration, then Land Management shall ask the applicant to confirm their offered consideration for the easement after having received the appraisal and shall remind applicants that Land Commission will not accept consideration offers for less than the full appraised value plus 15% for any requested use that does not directly benefit the Oneida Nation and/or its citizens.
- (c) *Land Commission Submittal.* When the Applicant returns the required information, submit an Easement Negotiation Summary Form to Land Commission for their consideration, except for easements on trust land where Land Commission has already waived consideration. Easements on trust land where Land Commission has already waived consideration do not need to go back to Land Commission and can be routed to the BIA for their final review and approval with the minutes from the Oneida Land Commission meeting approving the easement use, duration and waiver of consideration.

3.7-2. *Land Commission Review of Trust Land Easements.* If the easement is for use of tribal trust land, then there are not revisions to consider to the easement document, so the only thing for Land Commission to consider is the offered consideration. Land Commission shall decide if it accepts the offered consideration or if it will counter with a different request for consideration.

- (a) *Consideration Agreement Not Reached.* If the applicant and Land Commission do not eventually reach an agreement as to consideration, then no easement shall be granted.
- (b) *Consideration Agreement Reached.* If the applicant and Land Commission do reach an agreement as to consideration, then Land Management shall forward the minutes from Land Commission's meetings approving the easement use, duration and consideration to the BIA for easement processing. When the BIA processing is complete, so long as there is nothing preventing approval, then consideration will have to be paid to the Nation with the Nation's confirmation of payment sent to the BIA before the BIA will return the approved and executed easement document to the parties.

3.7-3. *Land Commission Review of Fee Land Easements.* If the easement is for use of tribal fee land, then Land Management shall ensure that the easement document is in final draft form and consideration information from the applicant is presented to the Land Commission. Land Commission shall make decisions as to the minimum consideration the Land Commission will accept and whether Land Commission will require any revisions to the easement document.

- (a) *Agreement Not Reached.* If the applicant and Land Commission do not eventually reach an agreement as to consideration and easement documents, then no easement shall be granted.

(b) *Agreement Reached.* If the applicant and Land Commission do reach an agreement as to consideration and easement documents, then Land Management shall complete the easement documents pursuant to Land Commission's direction and circulate for signature. Land Management shall provide the applicant with the signed easement documents only after receiving payment of the agreed upon consideration.

3.7-4. *Authority to Sign Easement Documents.* The Environmental, Land, and Agriculture Division Director and/or his or her designee is hereby authorized to sign easement documents approved in accordance with this Rule on behalf of the Oneida Land Commission.

3.8. Easement Administration

3.8-1. *Land Data Sheet.* All executed easements shall be forwarded to the Land Management Deputy Director and/or his or her designee for the information to be entered into the affected parcel's Land Data Sheet. Any party with an agreement affecting the same parcel shall be noticed of the executed easement affecting the parcel by the Deputy Director, provided that where a parcel has both internal and external end users (i.e. a parcel assigned to Comprehensive Housing Division to be used for residential offerings by the Nation and thereafter assigned to an Oneida citizen in a residential lease) the Deputy Director shall notice the internal user and it will be the internal user's responsibility to notice their users.

3.8-2. *Easement Corrections.* In the event there is any error in an easement the erroneous easement must be extinguished and a new easement entered in accordance with the processes in this Rule, provided that the old easement may be extinguished within the new easement.

3.8-3. *Affidavit of Completion.* Upon receipt of the Affidavit of Completion, Land Management shall schedule an inspection of the affected parcel and shall document the parcel's condition at the time the work is complete.

(a) If there were bonding requirements and Land Management reports the parcel is in acceptable condition, Land Management shall return funds held as bond in accordance with the easement documents.

(b) If there were bonding requirements and Land Management reports the parcel is not in acceptable condition, Land Management shall afford the grantee an opportunity to make the necessary repairs to return the parcel to acceptable condition. If the grantee does not make the repairs within the timeframe allotted, Land Management may deduct the replacement cost of repairs from the funds held for bonding and shall return the remainder of the bonding deposit to the grantee. To the extent the repair cost of the damages exceeds the amount of bond held, the Nation may pursue the remainder of damages using any available means of debt collection wherein the grantee shall pay attorneys fees and other collection costs as incurred.

3.8-4. *Easement Close-Out.* When an easement term is complete, Land Management shall ensure the easement has been removed from title and shall inspect and record the condition of the property at easement expiration. If the property was not left in acceptable condition, Land Management shall consult the Oneida Law Office for potential enforcement of contractual terms that may have survived expiration of the easement.

3.9. Requests for Easements on Individual Trust Land

3.9-1. *Individual Trust Land Easement Requests.* If the Nation receives a request for an easement on individual trust land, the Nation shall provide the ~~third party~~ requestor ~~with the names of~~ to the individual trust land owners. ~~Land owners consent will be requested upon negotiated value, and inform the requestor that~~ Land Management ~~will only compile information to be submitted to Bureau of Indian Affairs for their~~

~~discretionary approval. accepts~~

~~individual trust land easement requests from consenting individual trust land owners. Upon receipt of an individual trust land easement request from an individual trust land owner,~~ Land Management shall provide the applicant with the first steps for seeking approval for an easement from the BIA to include:

(a) *Survey.* A survey is required to determine the correct legal description for the easement. The applicant shall collect consent to survey forms signed by the landowners of the servient property and shall contract to have a survey completed. The legal description generated shall be confirmed in an Engineer's Affidavit or a Surveyor's Affidavit and provided to Land Management.

(b) *Appraisal.* Upon receipt of the survey information, Land Management shall draft a scope of work to be submitted to the Department of Interior AVSO for approval to order the appraisal. When the scope of work is approved, Land Management shall order an appraisal from an appraiser qualified to perform appraisals on federal land. When the appraisal is received, Land Management shall forward the appraisal to the Department of Interior AVSO for approval and forwarding to the BIA. When an approved appraisal is received, Land Management will provide the approved appraisal to the applicant.

3.9-2. *BIA Easement Application.* When Land Management has all survey and appraisal documents, Land Management shall send the BIA Easement Application to the Applicant to be returned with any applicable Consent to Grant Easement forms, which shows the affected land owners have reached agreement as to the purpose of the easement, the amount of consideration, and any bonding requirements that will apply, signed by the property owners of the servient property.

3.9-3. *Environmental and Cultural Reviews.* When Land Management has received the completed application and any signed Consent to Grant Easement forms, Land Management shall route the application to the Nation's environmental and cultural reviewers for completion of the environmental and cultural reviews respectively.

3.9-4. *BIA Submittal.* Once the Nation's environmental and cultural reviewers have submitted their reports to Land Management, Land Management shall forward the complete easement package to the BIA to complete the processing of the easement request. Upon decision from the BIA, the signed easement or easement denial, will be returned to Land Management and the affected property owners by the BIA; Land Management is not responsible for easement processing after the complete easement package is submitted to the BIA.

3.10. Recording Easements

3.10-1. *Recordation.* Land Management shall ensure that all easements executed in accordance with this Rule are recorded in Oneida Nation Register O of Deeds and, if for tribal trust, that the easement also appears on the federal trust title.

End.

Original effective date: 02-26-2025

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Title 6. Property and Land

Real Property – Chapter 601

Rule #3 – Easements

- 3.1 Purpose and Authority
- 3.2 Adoption, Amendment and Repeal
- 3.3 Definitions
- 3.4 Scope and Application
- 3.5 Requests for Easements on Tribal Land
- 3.6 Oneida Land Commission Preliminary Review
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3.1-2. *Authority.* The Real Property Law delegates rulemaking authority to the Environmental, Land, and Agriculture Division¹ and Land Commission pursuant to the Administrative Rulemaking law.

3.2 Adoption, Amendment and Repeal

3.2-1. This rule was adopted by the Land Commission in accordance with the procedures of the Administrative Rulemaking law.

3.2-2. This rule may be amended or repealed by the Environment, Land, and Agriculture Division and Land Commission pursuant to the procedures set out in the Administrative Rulemaking law.

3.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

3.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

3.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to easements.

3.3 Definitions

3.3-1. This section shall govern the definitions of words and phrases used within this rule provided that the definition section of the Real Property law shall also apply hereto. All words not defined herein shall be used in their ordinary and everyday sense.

(a) *Affidavit of Completion.* Means a legal document certifying as to the completion of

¹ The delegation of authority in the law was to Land Management and the Land Commission, however, since the law was adopted, Land Management has been rolled into a larger division, the Environmental, Land, and Agriculture Division, of which Land Management is now a department without separate management from the Division.

construction as related to the easement that acknowledges any known deviations from stated plans, permits or other approvals.

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(g) *Engineer's Affidavit*. Means a legal document completed by a licensed engineer that certifies a legal description provided in a survey document is accurate.

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(l) *Survey*. Means a document that measures and records the boundaries, elevation levels and angles of a parcel of land.

(m) *Surveyor's Affidavit*. Means a legal document completed by a licensed surveyor that certifies a legal description provided in a survey document is accurate.

3.4 Scope and Application

3.4-1. *General Applicability*. The requirements of this rule shall apply to all requests for easements on tribal land and to all individual trust land owners' requests for BIA approval of easements on individual trust land located within the Oneida Nation reservation except that this rule shall not apply to:

(a) *Service Line Agreements*. The requirements of this rule shall not apply to utility service line agreements to cross or access the Nation's property for the purpose of connecting a landowner's property to the main utility line. Service line agreement templates shall be reviewed and approved by the Oneida Law Office, for legal contract review, and the Oneida Land Commission, for content approval, on an annual basis. Land Management staff are authorized to execute service line agreements using approved templates without seeking Oneida Law Office or Oneida Land Commission review and

approval of individual service line agreements provided that no revisions are made to the template document; if any revisions are made to the template document, the Oneida Law Office and Oneida Land Commission must provide their respective reviews and approvals before Land Management may execute the agreement. Land Management shall submit all service line agreements affecting tribal trust land to the BIA for filing in the Land Title and Records Office.

(b) *Internal Entity Easement Requests.* Internal requests will not be granted official easement documents provided that, if any internal entity easement request is approved by Oneida Land Commission, the granted easement must be platted on a recorded survey and registered in the Geographic Land Information System (GLIS), to the extent capable.

3.5 Applications for Easements on Tribal Land

3.5-1. *Application Form.* Applicants shall submit requests for easements using the Tribal Land Easement Request Form available on Land Management's website, at a minimum the form shall:

- (a) Notice the requestor that there is a twenty-dollar (\$20) application fee for all applications;
- (b) Notice the requestor that there is a one-hundred-dollar (\$100) processing fee for easement applications received from individuals and a five hundred (\$500) for organizations that receive preliminary approval from the Land Commission pursuant to section 3.6;
- (c) Ask what requested use is and which parcels it affects;
- (d) Ask the requested duration of the requested use;
- (e) Ask the requested method of communication with applicant noting a preference for email communication; and
- (f) Ask whether there is a preliminary offer of consideration for the easement or a request for waived consideration.
- (g) Note that fees are waived for easements needed for development and/or title clean up driven by the Nation.

3.5-2. Upon receipt of an easement application, Land Management shall:

- (a) Send the request to the Land Assessment Team established in the LANDBAC Rule for feedback. The team members shall have five (5) business days to submit feedback.
- (b) Order a title report for the affected parcel.
- (c) Upon the close of the feedback period, prepare a recommendation explaining whether Land Management recommends Land Commission grant the easement for the requested use and duration for the consideration presented, or requested to be waived.
- (d) Submit Land Management's easement recommendation to the next available Oneida Land Commission agenda along with all feedback from the Land Assessment Team.
- (e) Provide the applicant with a copy of Land Management's recommendation and the date the recommendation will be the Land Commission agenda date with notice that Land Management will inform the applicant of the Oneida Land Commission's decision within five (5) business days of the meeting date.

3.6 Land Commission's Preliminary Review

3.6-1. *Land Commission Easement Decision.* When Land Management's easement recommendation is presented to Land Commission, the Land Commission shall:

- (a) Approve or deny the recommendation with regard to the requested use;
 - (b) Approve or deny the recommendation with regard to the requested use duration;
- and

(c) Approve or deny the recommendation with regard to the requestor's proposed consideration. Specifically, if Land Commission wishes to waive the requirement for an appraisal and accept the offered consideration, Land Commission must inform Land Management at this meeting. If the use and duration are approved, then Land Management shall proceed with processing the application and collect the processing fee.

3.6-2. *Notice of Easement Decision.* Land Management shall notify the Applicant of the Land Commission's decisions concerning the easement request within five (5) business days of the Land Commission's meeting date.

(a) *Notice of Easement Decision Letter.* Land Management shall draft Notice of Easement Decision Letter for applicants that explains the decisions made by the Oneida Land Commission.

(1) If the land commission approved proceeding, the letter shall also include:

(A) Notice the applicant that the Applicant is responsible for all survey and appraisal costs and that survey and appraisal costs, regardless of whether an easement is ultimately granted or not;

(i) *Survey.* A survey is required to determine the correct legal description for the easement and that there are specific surveying requirements applicable to trust land. The legal description generated shall be confirmed in an Engineer's Affidavit or a Surveyor's Affidavit submitted to Land Management. Land Management shall advise whether a Land Use License is required to allow the applicant to complete the survey.

(ii) *Appraisal.* Land Management shall notice the applicant that Land Commission will not accept consideration offers for less than the full appraised value plus fifteen percent (15%) for any requested use that does not directly benefit the Oneida Nation and/or its citizens. For fee land, the Applicant may use any appraisal company to complete the appraisal, provided that, the Nation may elect to procure a competing appraisal for the purpose of price negotiation. The Nation orders appraisals on trust land. Land Management shall draft a scope of work to be submitted to the United States Department of Interior, Appraisal and Valuation Services Office for approval. When the scope of work is approved, Land Management shall order an appraisal from an appraiser qualified to perform appraisals on federal land. When the appraisal is received, Land Management shall forward the appraisal to the Department of Interior AVSO for approval and forwarding to BIA.

(B) Land Management shall notice the applicant that Land Commission will not accept consideration offers for less than the full appraised value plus 15% for any requested use that does not directly benefit the Oneida Nation and/or its citizens;

(C) Notice that a Land Use Permit will be required from the Oneida Zoning Department and contact information for said department;

(D) If trust land, the BIA easement application documents;

(E) If the applicant is an organization and not an individual, notice that the applicant must submit:

(i) Organizational documents and by-laws;

- (ii) Evidence of Authority of Officers to Execute Papers form;
- (F) Notice that an Affidavit of Completion is required to be submitted when the work is complete.

3.7 Land Commission Final Review

3.7-1. *Land Management Preparation for Land Commission.* When the required documents are returned to Land Management in accordance with the noticed requirements, then Land Management shall:

- (a) *Draft Easement.* If the easement is on trust land, send the applicant the BIA template easement and inform the applicant that revisions may not be requested to the template. If the easement is on fee land, then Land Management shall prepare the draft easement using the Oneida Easement Template approved by the Oneida Land Commission.
- (b) *Consideration Confirmation.* If Land Commission has not approved a waiver of consideration, then Land Management shall ask the applicant to confirm their offered consideration for the easement after having received the appraisal and shall remind applicants that Land Commission will not accept consideration offers for less than the full appraised value plus 15% for any requested use that does not directly benefit the Oneida Nation and/or its citizens.
- (c) *Land Commission Submittal.* When the Applicant returns the required information, submit an Easement Negotiation Summary Form to Land Commission for their consideration, except for easements on trust land where Land Commission has already waived consideration. Easements on trust land where Land Commission has already waived consideration do not need to go back to Land Commission and can be routed to the BIA for their final review and approval with the minutes from the Oneida Land Commission meeting approving the easement use, duration and waiver of consideration.

3.7-2. *Land Commission Review of Trust Land Easements.* If the easement is for use of tribal trust land, then there are not revisions to consider to the easement document, so the only thing for Land Commission to consider is the offered consideration. Land Commission shall decide if it accepts the offered consideration or if it will counter with a different request for consideration.

- (a) *Consideration Agreement Not Reached.* If the applicant and Land Commission do not eventually reach an agreement as to consideration, then no easement shall be granted.
- (b) *Consideration Agreement Reached.* If the applicant and Land Commission do reach an agreement as to consideration, then Land Management shall forward the minutes from Land Commission's meetings approving the easement use, duration and consideration to the BIA for easement processing. When the BIA processing is complete, so long as there is nothing preventing approval, then consideration will have to be paid to the Nation with the Nation's confirmation of payment sent to the BIA before the BIA will return the approved and executed easement document to the parties.

3.7-3. *Land Commission Review of Fee Land Easements.* If the easement is for use of tribal fee land, then Land Management shall ensure that the easement document is in final draft form and consideration information from the applicant is presented to the Land Commission. Land Commission shall make decisions as to the minimum consideration the Land Commission will accept and whether Land Commission will require any revisions to the easement document.

- (a) *Agreement Not Reached.* If the applicant and Land Commission do not eventually reach an agreement as to consideration and easement documents, then no easement shall be granted.

(b) *Agreement Reached*. If the applicant and Land Commission do reach an agreement as to consideration and easement documents, then Land Management shall complete the easement documents pursuant to Land Commission's direction and circulate for signature. Land Management shall provide the applicant with the signed easement documents only after receiving payment of the agreed upon consideration.

3.7-4. *Authority to Sign Easement Documents*. The Environmental, Land, and Agriculture Division Director and/or his or her designee is hereby authorized to sign easement documents approved in accordance with this Rule on behalf of the Oneida Land Commission.

3.8. Easement Administration

3.8-1. *Land Data Sheet*. All executed easements shall be forwarded to the Land Management Deputy Director and/or his or her designee for the information to be entered into the affected parcel's Land Data Sheet. Any party with an agreement affecting the same parcel shall be noticed of the executed easement affecting the parcel by the Deputy Director, provided that where a parcel has both internal and external end users (i.e. a parcel assigned to Comprehensive Housing Division to be used for residential offerings by the Nation and thereafter assigned to an Oneida citizen in a residential lease) the Deputy Director shall notice the internal user and it will be the internal user's responsibility to notice their users.

3.8-2. *Easement Corrections*. In the event there is any error in an easement the erroneous easement must be extinguished and a new easement entered in accordance with the processes in this Rule, provided that the old easement may be extinguished within the new easement.

3.8-3. *Affidavit of Completion*. Upon receipt of the Affidavit of Completion, Land Management shall schedule an inspection of the affected parcel and shall document the parcel's condition at the time the work is complete.

(a) If there were bonding requirements and Land Management reports the parcel is in acceptable condition, Land Management shall return funds held as bond in accordance with the easement documents.

(b) If there were bonding requirements and Land Management reports the parcel is not in acceptable condition, Land Management shall afford the grantee an opportunity to make the necessary repairs to return the parcel to acceptable condition. If the grantee does not make the repairs within the timeframe allotted, Land Management may deduct the replacement cost of repairs from the funds held for bonding and shall return the remainder of the bonding deposit to the grantee. To the extent the repair cost of the damages exceeds the amount of bond held, the Nation may pursue the remainder of damages using any available means of debt collection wherein the grantee shall pay attorneys fees and other collection costs as incurred.

3.8-4. *Easement Close-Out*. When an easement term is complete, Land Management shall ensure the easement has been removed from title and shall inspect and record the condition of the property at easement expiration. If the property was not left in acceptable condition, Land Management shall consult the Oneida Law Office for potential enforcement of contractual terms that may have survived expiration of the easement.

3.9. Requests for Easements on Individual Trust Land

3.9-1. *Individual Trust Land Easement Requests*. If the Nation receives a request for an easement on individual trust land, the Nation shall provide the request to the individual trust land owners. Land owners consent will be requested upon negotiated value. Land Management will compile information to be submitted to Bureau of Indian Affairs for their discretionary approval. Land Management shall provide the applicant with the first

steps for seeking approval for an easement from the BIA to include:

(a) *Survey*. A survey is required to determine the correct legal description for the easement. The applicant shall collect consent to survey forms signed by the landowners of the servient property and shall contract to have a survey completed. The legal description generated shall be confirmed in an Engineer's Affidavit or a Surveyor's Affidavit and provided to Land Management.

(b) *Appraisal*. Upon receipt of the survey information, Land Management shall draft a scope of work to be submitted to the Department of Interior AVSO for approval to order the appraisal. When the scope of work is approved, Land Management shall order an appraisal from an appraiser qualified to perform appraisals on federal land. When the appraisal is received, Land Management shall forward the appraisal to the Department of Interior AVSO for approval and forwarding to the BIA. When an approved appraisal is received, Land Management will provide the approved appraisal to the applicant.

3.9-2. *BIA Easement Application*. When Land Management has all survey and appraisal documents, Land Management shall send the BIA Easement Application to the Applicant to be returned with any applicable Consent to Grant Easement forms, which shows the affected land owners have reached agreement as to the purpose of the easement, the amount of consideration, and any bonding requirements that will apply, signed by the property owners of the servient property.

3.9-3. *Environmental and Cultural Reviews*. When Land Management has received the completed application and any signed Consent to Grant Easement forms, Land Management shall route the application to the Nation's environmental and cultural reviewers for completion of the environmental and cultural reviews respectively.

3.9-4. *BIA Submittal*. Once the Nation's environmental and cultural reviewers have submitted their reports to Land Management, Land Management shall forward the complete easement package to the BIA to complete the processing of the easement request. Upon decision from the BIA, the signed easement or easement denial, will be returned to Land Management and the affected property owners by the BIA; Land Management is not responsible for easement processing after the complete easement package is submitted to the BIA.

3.10. Recording Easements

3.10-1. *Recordation*. Land Management shall ensure that all easements executed in accordance with this Rule are recorded in Oneida Nation Register of Deeds and, if for tribal trust, that the easement also appears on the federal trust title.

End.

Original effective date: 02-26-2025

The following is important information for the 2025 General Welfare Assistance Payments
Oneida Nation Assistance Fund (\$1500.00/ 18+) (\$2000.00/ 62+)
Elder Assistance Program (703.54/ 65+)

- Paper applications were mailed late May 2026 (if not received by the end of June, please contact Trust Enrollment Department)
- Online submission began Monday June 1st, 2026.
- Timeline
 - The application must be submitted online or by mail by 4:30 pm (CST) on Friday August 7th, 2026.
 - Payments will be issued by August 31st, 2026. Please account for delivery time if requesting a check.
 - **Please Note:** Applications received August 8th, 2026, through March 1st, 2027, payment will be issued by March 26th, 2027, for the following:
 - Oneida Nation Assistance Fund (\$1500.00/ 18+) (\$2000.00/ 62+)
 - Elder Assistance Program (703.54/ 65+)
 - All GWA checks expire 90 days from the date issued. GWA checks not cashed within the 90-day expiration date will be returned to the GWA Program for other uses.
 - **There will be no other chance to claim this payment if you miss the March 1, 2027, deadline.**
- Members Only Website ([Oneida-nsn.gov](https://oneida-nsn.gov))
 - Online Services
 - Members may view and update their basic Enrollment information online
 - Confirm and update your address
 - Confirm and update contact information
 - Confirm and update banking information.
 - **Deadline to submit any changes to contact or banking information to reflect your GWA payment is August 7th, 2026**
- Direct Deposit Information
 - You are responsible to update/cancel your direct deposit information with the Trust Enrollment Department. Your direct deposit information will remain in effect INDEFINITELY.
 - Direct Deposit (ACH) Authorization Forms may be obtained by visiting our website, contacting the Trust Enrollment Department, update
 - Trust Enrollment Department will no longer accept digital banking such as Venmo, Chime, PayPal, GreenDot, GoBank, etc. If any online banking institution is received, you will be notified by mail.

2026 Minor Trust Payment Information

If you were born between 9/2/2004 – 9/1/2008

There may be a Minor Trust Account available for you to claim or defer.

Minor Trust Accounts have been established for enrolled tribal members under the age of 18 for those members eligible to receive their Minor Trust Account or the members who previously deferred.

The Minor Trust Payment Deferral forms were mailed the first week in March 2026

If you do not receive a **PINK** Minor Trust Payment Form packet

in the mail by April 1, 2026 contact Trust Enrollment Department or find the

Minor Trust Payment Deferral forms available online:

<https://oneida-nsn.gov/resources/enrollments/>

Deadline to submit the PINK Form to Defer or to Claim all is:

Wednesday July 1, 2026, 4:30 PM (CST)

(No Exceptions)

Receipts: A receipt will be mailed within 2 weeks of your submission whether you defer or claim all.

If not received, contact the Oneida Trust Enrollment Department.

Deadline for Proof of Graduation Document & Direct Deposit Form is:

Tuesday September 1, 2026, 4:30 PM (CST)

(No Exceptions)

If you have not yet claimed your Minor Trust Account and you are 21 contact the Trust Enrollment Department immediately.

Minor Trust Payment will be issued...
end October 2026

Please visit our website for additional information: <https://oneida-nsn.gov/resources/enrollments/>

Oneida Trust Enrollment Department

Mail-ins USPS -> PO Box 365, Oneida, WI 54155-0365

920-869-6200 • 800-571-9902

Please deliver in person or by courier delivery only (Fed Ex, UPS) at street address below
210 Elm St., Oneida WI 54155 (No office mailbox)

NOTICE OF

PUBLIC MEETING

TO BE HELD

June 17, 2026 5:30-7:00PM **at** Norbert Hill Center
IN THE

Cafeteria

In accordance with the Administrative Rulemaking Law, the
Higher Education Office
is hosting this Public Meeting to gather feedback from the
community regarding the following rule.

TOPIC: Higher Education Grant Rule #1

This is a proposal to adopt a rule which would:

- ◆ Detail Application Requirements
- ◆ Review Documentation Requirements
- ◆ Clarify Funding Framework
- ◆ Describe Award Calculation
- ◆ Layout Appeal Process

To obtain copies of the Public Meeting documents for this proposal,
please visit www.oneida-nsn.gov/Register/PublicMeetings.

PUBLIC COMMENT PERIOD

OPEN UNTIL June 24, 2026

During the Public Comment Period, all interested persons may submit written comments and/or a transcript of any testimony/spoken comments made during the Public Meeting. These may be submitted to Higher Education Department by U.S. mail, interoffice mail, e-mail or fax.

Higher Education Office

P.O. Box 365

Oneida, WI 54155

Highered@Oneidanation.org

Fax: 920-869-4039

NOTICE OF

PUBLIC MEETING

TO BE HELD

June 15, 2026 at 1:15 PM

IN THE

**Land Management Conference Room
470 Airport Drive
Oneida, WI 54155**

In accordance with the Administrative Rulemaking Law and, as related to the ARMMP plan, as required by Federal regulations, the Land, Environmental, Agriculture, and Food Division (LEAF) is hosting this Public Meeting to gather feedback from the community regarding the following.

TOPICS:

- Real Property Rule No. 3 — Easements
- ARMMP PLAN

The amendments to the Real Property Law Rule No. 3—Easements would:

- Eliminate fees for Oneida driven projects; and
- Eliminate the obligation to provide an external entity with individual trust land owner(s) name and contact information.

The ARMMP PLAN, is an agricultural resource management and monitoring plan that the Nation has created internally working with staff and consultants as part of our BIA compliance requirement.

To obtain copies of the Public Meeting documents for this proposal, please visit www.oneida-nsn.gov/Register/PublicMeetings.

PUBLIC COMMENT PERIOD OPEN UNTIL Thursday, June 25, 2026

During the Public Comment Period, all interested persons may submit written comments and/or a transcript of any testimony/spoken comments made during the Public Meeting. These may be submitted to Land, Environmental, Agriculture and Food Division (LEAF) by U.S. mail, interoffice mail, or e-mail.

Phone: 920-869-6500

Oneida Land Management

470 Airport Drive, Oneida, WI 54155

dwilson@oneidanation.org

Public Meeting Sign In Sheet

Real Property Law Rule No. 3 Amendments

June 15th at 1:15 p.m., Land Management Conf. Rm. 470 Airport Dr. Oneida, WI

	Name	Phone or Email
1	Eric McLester	920-655-6221
2	Lauren Hartman	Lhartman@oneidanation.org
3	Diane Wilson	dwilson@oneidanation.org
4		
5		
6		
7		
8		
9		
10.		



Statement of Effect

Amendments to Real Property Law Rule No. 3 – Easements

Summary

The amendments to the Real Property Law Rule No. 3 – Easements address the waiver of fees for easements needed for development and/or title clean up driven by the Nation, and individual trust land easement requests.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: May 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation's laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as "any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority." [1 O.C. 106.3-1(a)].

The Real Property law provides regulations and procedures for the transfer, control and management of the territory within the Reservation and all Tribal land and to integrate these regulations and procedures with the real property laws and practices of other federal and state sovereigns which may hold concurrent jurisdiction. [6 O.C. 601.1-1]. It is the policy of the Nation to set out the responsibilities and expectations for persons purchasing and/or managing real property on behalf of the Nation and/or within the Reservation and to provide real property holder's rights and responsibilities. [6 O.C. 601.1-1].

The Real Property law delegates joint administrative rulemaking authority to the Oneida Land Commission and Land Management to jointly develop rules regarding easements and land use licenses. [6 O.C. 601.5-2(e), 601.5-3(b)]. The Real Property law provides that the Oneida Land Commission is responsible for approving or denying all easements or land use licenses. [6 O.C. 601.5-2(b)].

The purpose of the Real Property Law Rule No. 3 – Easements (“the Rule”) is to provide procedures for granting easements over, under and across tribal lands in order to best protect the interests of the Oneida Nation, and also addresses how Land Management facilitates the processing of easements on individual trust land. [Rule 3.1-1]. The amendments to this Rule addresses:

- Requires the application form to include a note that fees are waived for easements needed for development and/or title clean up driven by the Nation. [Rule 3.5-1(g)];
- Address individual trust land easement requests by providing requests for an easement on individual trust land directly to the individual trust land owners, instead of providing the requestor with the names of the individual trust land owners; and providing that land owners consent will be requested upon negotiated value, and that Land Management will only compile information to be submitted to the Bureau of Indian Affairs for their discretionary approval. [Rule 3.9-1]; and
- Make other minor drafting changes throughout the Rule.

Conclusion

There are no legal bars to adopting the amendments to the Real Property Law Rule No. 3 – Easements.

Financial Analysis for Easement Rule 3 Amendment

Type of Cost	Description/Comment	Dollar Amount
Start Up Costs	Prior Land Commission discretionary decision that is no longer available with Rule	0
Personnel	Delay in completion of necessary documentation	0
Office	Administrative processing of additional income	0
Documentation Costs	Eliminated tracking of income	0
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Return to prior discretionary decision making on tribal development and title clearing of easement requirements.	0
Other, please explain	Prior tribal staff or agents lacked knowledge to process easements on trust properties. Utilities were placed without proper documentation. Land developer/owner pay utility to come into their property to serve future development. Compliance with Self-Governance Compact with Individual Trust easement processing.	
Total	Annual Net Revenue	\$0-4000.00 est.

Adopt Technology Resources Law - Chapter 215 - Rule # 001- Acceptable Use

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
☐ Law Office	☒ DTS
☐ Gaming/Retail	☐ Boards, Committees, or Commissions
☐ Other: <i>Describe</i>	

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
2. Clear Desk
 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
 - b. Ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.
4. Security Awareness
 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
5. Password Management
 - a. Passwords play a crucial role in digital security, protecting user accounts and Oneida Nation's digital assets.
6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

NOTICES

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
 - 002–Clear Desk
 - 003–Asset Management
 - 004–Security Awareness
 - 008–Third Party Provider
 - 009–Generative AI Usage
- Who would be affected:**
- Employees and Contractors,
 - Vendors, and Third-Party Providers

**PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357**

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

As no public comments were submitted during the designated comment period, there are no comments requiring review, response, or incorporation into the proposed amendments.

This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 Technology Resources Law Rule #001 – Acceptable Use

- 1.1 Purpose and Authority
- 1.2 Adoption, Amendment and Repeal
- 1.3 Definitions
- 1.4 Purpose and Scope
- 1.5 Facilities and Equipment
- 1.6 Information Access, Content, and Use
- 1.7 Protecting Confidential Information
- 1.8 Copyrighted Information
- 1.9 Privacy and Monitoring
- 1.10 Storing and Archiving Information
- 1.11 Employee Usage
- 1.12 Email Etiquette
- 1.13 Enforcement
- 1.14 References

1.1 Purpose and Authority

1.1-1. *Purpose.* The purpose of this rule is to provide guidelines and techniques to promote effective use of the Nation's Digital Technology Systems. It applies to all of the Nation's systems located on, or accessed from, Nation properties and systems provided by the Nation for use in the Nation's business.

1.1-2. *Policy.* It is the policy of the Nation to provide sophisticated computer and communications systems to support official business activities, enabling effective and timely communication among staff, customers, partners, and vendors. This rule establishes expectations for all staff regarding the access, use, and disclosure of information via the Nation's Information Systems, which are to be used solely for official business purposes in accordance with these guidelines and other relevant policies.

1.1-3. *Authority.* The Technology Resources Law delegates rulemaking authority to the Digital Technology Services Department pursuant to the Administrative Rulemaking law.

1.2. Adoption, Amendment and Repeal

1.2-1. This rule was adopted by the Oneida Business Committee in accordance with the procedures of the Administrative Rulemaking law.

1.2-2. This rule may be amended or repealed by the Digital Technology Services Department and/or the Oneida Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

1.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

1.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

1.2-5. This rule supersedes all internal department rules, regulations, policies, or other requirements relating to acceptable use as referenced in the Technology Resources Law.

1.3. Definitions

1.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) “Nation” means the Oneida Nation.
- (b) “Confidential data” means any information that the Nation is obligated by law, policy, or regulation to protect from unauthorized access, use, disclosure, modification, or destruction.
- (c) “Personal use” means any technology resource use that is conducted for purposes other than accomplishing an authorized activity or official business of the Nation.
- (d) “Technology resources” means any tools, systems, and applications that use technology to fulfill their purposes. Technology resources may include, but are not limited to, computers, tablets, telephones, facsimile machines, photocopiers, networks, virtual applications, and software, such as internet connectivity and access to internet services and electronic mail.
- (e) “Staff” means any individual who uses the technology resources of the Nation, including but not limited to employees, independent contractor personnel, interns, members of boards, committees or commissions, volunteers, guests, and visitors.

1.4. Facilities and Equipment

1.4-1. The Nation maintains facilities, equipment, and communication systems (e.g., telephones, email, computers, fax machines) to enhance operational efficiency. These systems, provided at the Nation’s expense, are for official business only. Access is granted based on job responsibilities, and use is subject to this rule.

1.4-2. Staff shall not remove equipment or software from the Nation’s premises or use personal equipment for official business without prior express consent from the employee’s senior level manager or director.

1.4-3. Alternate internet service provider connections to the Nation’s network are prohibited unless approved by management and secured by appropriate security devices.

1.5 Information Access, Content, and Use

1.5-1. *Technology and Resources.* The Nation invests in advanced technology to support official business. All staff with access to technology resources shall read, understand, and comply with this rule.

1.5-2. *Business Use.*

- (a) Information Systems are owned by the Nation and shall be used exclusively for business purposes, serving customer interests, and supporting normal operations.
- (b) Staff decisions to use these systems should be based on sound business practices, reducing costs, or improving services measurably, while maintaining a professional image.
- (c) Staff using the Nation’s accounts act as representatives of the Nation and shall avoid damaging the organization’s reputation.

1.5-3. *Acceptable Use.* Use of the Nation’s facilities, equipment, or systems is limited to acceptable use as defined in this rule. Incidental personal use is permitted if it is not excessive, does not interfere with job performance, consume significant resources, or disrupt other staff activities, as determined by the Nation.

1.5-4. *Professional Conduct.* Staff shall conduct official business consistent with the Nation's mission and comply with tribal, state, and federal laws, maintaining standards of integrity, accountability, and legal sufficiency.

1.5-5. *Information Accuracy.*

- (a) Staff shall disseminate current, accurate, complete, and compliant information.
- (b) Information shared through technology resources shall be handled with the same level of care as other forms of communication. Users should ensure that content respects intellectual property rights, including copyrights, trademarks, and trade secrets.
- (c) Staff using Internet information for strategic business decisions shall verify its integrity, ensuring the source is regularly updated and valid.

1.5-6. *Confidential and Proprietary Information.*

- (a) Staff shall protect confidential and proprietary information.
- (b) Questions regarding the appropriate use of technology resources or handling of information, staff should consult their area manager or director for guidance.
- (c) Staff shall not discuss the Nation's business prospects, financial condition, or future products with third parties unless publicly disclosed by the Nation.
- (d) Unauthorized disclosure of confidential or proprietary information may result in legal action.

1.5-7. *Public Accessibility.*

- (a) Designated staff may make information publicly accessible after management review to verify accuracy and appropriateness.
- (b) Publicly accessible information shall be periodically reviewed to remove inaccurate, inappropriate, or nonpublic content.

1.6. Protecting Confidential Information

1.6-1. *Importance and Procedures.* Maintaining confidentiality is critical to the Nation's success. Staff shall follow appropriate procedures to protect confidential information, exercising caution when communicating externally, as electronic communications are not fully secure.

1.6-2. *Data Classification.* Confidential data shall be marked with designations such as "Confidential," "Do not reproduce," or "Do not forward." Emails containing confidential information shall include "Confidential" in the subject line.

1.6-3. *Access Restrictions.*

- (a) Access to directories containing sensitive or confidential data is restricted.
- (b) Unauthorized attempts to bypass restrictions, including hacking, violate this rule and may lead to disciplinary action, including termination or legal action. Hacking may also violate the Federal Electronic Communications Privacy Act (18 U.S.C. 2510).

1.6-4. *Privacy of Communications.* Staff shall respect the privacy of messages received, securing voicemail and email accounts with proper password protection, closing messages after reading, and deleting unnecessary messages.

1.6-5. *Internet Privacy.*

- (a) The internet does not guarantee privacy. Staff shall exercise caution when transferring sensitive material online by using secure methods (e.g., encrypted channels, approved platforms) and avoiding public or unsecured networks. This helps prevent unauthorized access or third-party interception.

(b) Staff shall not place the Nation's materials—such as copyrighted software, internal correspondence, or other proprietary content—on publicly accessible internet-connected devices or platforms without prior approval from their area manager or director.

1.7. Copyrighted Information

1.7.1. *Intellectual Property Rights.*

- (a) The Nation respects intellectual property rights. Staff shall comply with license terms for copyrighted material (e.g., literature, software, graphics) and not assume availability on electronic systems permits downloading or dissemination.
- (b) Unauthorized or illegal use of third-party intellectual property, including downloading copyrighted software, video, or audio clips, is prohibited.
- (c) Employees/users shall consult with management if unsure about use of third-party intellectual property.

1.7-2. *Trademark and Copyright Notices.*

- (a) The Nation's trademarked or copyrighted material shall be properly marked.
- (b) Staff shall not remove third-party trademark or copyright notices.

1.7-3. *Software Use.*

- (a) Software use shall comply with the Nation's licensing agreements.
- (b) Copying software, loading personal software, or downloading Internet software without permission is prohibited.
- (c) Software and firmware shall be digitally signed using a recognized, approved certificate.
- (d) All Nation-owned software remains with Nation upon staff departure.

1.8. Privacy and Monitoring

1.8-1. *Expectation of Privacy.* Staff have no reasonable expectation of personal privacy regarding data, communications, or activities on the Nation systems, which may be monitored, accessed, or reviewed by authorized personnel without notice to ensure compliance with policies, legal requirements, and security protocols.

1.8-2. *Monitoring and Inspection.*

- (a) The Nation reserves the right to access, inspect, or search all Information Systems, including directories, files, emails, and communication systems, without prior notice. Monitoring may occur to:
 - (1) Prevent transmission of discriminatory, harassing, or offensive messages.
 - (2) Detect illegal material or unlicensed software.
 - (3) Ensure communication tools are not used for unauthorized or disruptive purposes.
 - (4) Investigate allegations of impropriety.
 - (5) Access information in staff absence.
 - (6) Respond to legal proceedings or court orders. Staff refusing to cooperate with legitimate inspections or provide passwords may face disciplinary action, including termination. The Nation may restrict or cancel staff access to systems at any time.

1.8-3. *System Ownership.*

- (a) All messages, data, and applications on Information Systems are Oneida Nation property, subject to third-party intellectual property rights.

- (b) The Nation may access, review, copy, delete, or disclose data for legitimate business purposes.

1.9. Storing and Archiving Information

1.9-1. Electronic data is subject to routine backups and archival procedures, retaining copies for extended periods. Deleting data does not ensure privacy, as archives remain property of the Nation and may be used for business purposes.

1.9-2. Staff may need to preserve data for litigation or investigations per the Data Retention Rule. Staff shall regularly delete or archive files to manage disk space, avoiding large file transfers during prime hours to minimize network impact.

1.10. Employee Usage

1.10-1. *Compliance.* Staff shall comply with this rule. Violations of this rule may result in disciplinary action, including termination or legal action.

1.10-2. *Prohibited Activities.*

- (a) Personal use of technology resources for financial gain or soliciting for non-business purposes (e.g., political, religious causes) is prohibited.
- (b) Inappropriate use of technology resources includes accessing, storing, or transmitting sexually explicit, illegal, or disruptive materials (e.g., defamatory, obscene, or harassing content)
- (c) Sending threatening, slanderous, or anonymous messages, or misrepresenting identity, is prohibited.
- (d) Staff shall not copy or transfer files without permission, disable virus protection, circumvent security mechanisms, or share confidential information externally.
- (e) Staff shall cooperate with authorized investigations.
- (f) If offensive material is accessed, staff shall disengage immediately.
- (g) The Nation is not responsible for offensive content on external servers.

1.10-3. *System Awareness.* Staff shall:

- (a) Protect equipment from food and/or drink and know fire suppression equipment locations.
- (b) Keep unauthorized people away from equipment and data. Question strangers in areas.
- (c) Report security violations, including unauthorized data changes or loss, to management immediately.

1.11. Email Etiquette

- (a) Email is for official business. Use of the Nation's accounts for personal email use should be limited to occasional use.
- (b) Staff shall:
 - (1) Use descriptive subject lines and include contact information in signatures.
 - (2) Acknowledge receipt of important emails, even if unable to respond immediately.
 - (3) Delete read or sent emails to conserve storage.
 - (4) Avoid sending unnecessary or large emails to preserve network resources.
 - (5) Refrain from harassing, offensive, anonymous, or all-caps messages, avoiding terse or rude tones.

- (6) Proofread messages, prioritize appropriately, and send to relevant recipients only.
- (7) Exercise caution with unencrypted emails and attachments, as email is generally not secure.
- (8) Reply carefully, avoiding unintended “Reply all,” and consider sender’s intentions before forwarding.

1-12. Enforcement

1.12-1. Violations of this rule may result in disciplinary action, up to and including termination, and potential legal action.

1.13. References

1.13-1. References include:

- (a) COBIT APO01.02, APO01.11, APO07.03, APO07.05, APO13.01, APO13.02, DSS04.05
- (b) GDPR Article 32
- (c) HIPAA 164.308(a)(1)(ii)(B), 164.312(a)(2)(iv)
- (d) ISO 27001 7.3, A.5.4, A.5.10, A.5.12-13, A.6.3-4, A.8.16
- (e) NIST SP 800-37 3.3
- (f) NIST SP 800-53 AT-3.2, CA-3.4, PS-3.16
- (g) NIST Cybersecurity Framework ID.AM-6, ID.GV-2, DE.DP-2
- (h) PCI 12.1.1

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Acceptable Use Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Acceptable Use

Name of law being interpreted: Technology Resources Law

Rule Number: 1

Other Laws or Rules that may be affected: Proposed Data Classification Rule, proposed Data Retention Rule, proposed Password Standard, & proposed BYOD Rule.

Brief Summary of the proposed rule: Provides guidelines and techniques for acceptable and effective use of Oneida Nation's Digital Technology Systems.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.*

Financial Analysis for Acceptable Use Rule

Type of Cost	Description/Comment	Dollar Amount
Start Up Costs	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation Costs	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Oneida Nation
 Oneida Business Committee
 Legislative Operating Committee
 PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Technology Resources Law Rule No. 1 – Acceptable Use

Summary

The Technology Resources Law Rule No. 1 – Acceptable Use provides guidelines and techniques to promote effective use of Nation’s Digital Technology Systems. [Rule 1.1-1].

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation’s laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The Technology Resources law addresses acceptable use. The Technology Resources law provides that users may utilize technology resources for authorized activities. [2 O.C. 215-4-1]. Users may engage in personal use of technology resources when such use does not interfere with the mission or operations of the entity in control of the resources and does not violate applicable laws, rules, or standard operating procedures of the Nation. [2 O.C. 215-4-2]. Employees may engage in limited personal use of technology resources if the usage does not violate section 215.5-1 of the law regarding inappropriate personal use or standards enacted pursuant to section 215.7-1 of the law regarding limitations on use. [2 O.C. 215-4-3].

The purpose of the Technology Resources Law Rule No. 1 – Acceptable Use (“the Rule”) is to provide guidelines and techniques to promote effective use of Nation’s Digital Technology Systems. [Rule 1.1-1]. It applies to all Nation systems located on, or accessed from, Nation properties and systems provided by the Nation for use in the Nation’s business. *Id.* It is the policy of the Nation to provide sophisticated computer and communications systems to support official business activities, enabling effective and timely communication among staff, customers, partners, and vendors. [Rule 1.1-2]. This rule establishes expectations for all staff regarding the access, use, and disclosure of information via the Nation’s Information Systems, which are to be used solely for official business purposes in accordance with these guidelines and other relevant policies. *Id.* The Rule addresses:

- Facilities and Equipment [Rule 1.4];
- Information Access, Content, and Use [Rule 1.5];
- Protecting Confidential Information [Rule 1.6];
- Copyrighted Information [Rule 1.7];
- Privacy and Monitoring [Rule 1.8];
- Storing and Archiving Information [Rule 1.9];
- Employee Usage [Rule 1.10];
- Email Etiquette [Rule 1.11];
- Enforcement [Rule 1.12]; and
- References [Rule 1.13].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 1 – Acceptable Use.

Adopt Technology Resources Law - Chapter 215 - Rule # 002 - Clear Desk/Screen

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
☐ Law Office	☒ DTS
☐ Gaming/Retail	☐ Boards, Committees, or Commissions
☐ Other: <i>Describe</i>	

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
2. Clear Desk
 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
 - b. Ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.
4. Security Awareness
 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
5. Password Management
 - a. Passwords play a crucial role in digital security, protecting user accounts and Oneida Nation's digital assets.
6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

NOTICES

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
 - 002–Clear Desk
 - 003–Asset Management
- 004–Security Awareness
 - 008–Third Party Provider
 - 009–Generative AI Usage

Who would be affected: Employees and Contractors, Vendors, and Third-Party Providers

**PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357**

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

As no public comments were submitted during the designated comment period, there are no comments requiring review, response, or incorporation into the proposed amendments.

This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 TECHNOLOGY RESOURCES LAW Rule #002 – Clear Desk/Screen

- 2.1 Purpose and Authority
- 2.2 Adoption, Amendment and Repeal
- 2.3 Definitions
- 2.4 Digital Security Office Responsibilities
- 2.5 Staff Responsibilities
- 2.6 References

2.1 Purpose and Authority

2.1-1. *Purpose.* To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.

2.1-2. *Authority.* The Technology Resources Law delegates rulemaking authority to the Digital Technology Services Department pursuant to the Administrative Rulemaking law.

2.2. Adoption, Amendment and Repeal

2.2-1. This rule was adopted by the Oneida Business Committee in accordance with the procedures of the Administrative Rulemaking law.

2.2-2. This rule may be amended or repealed by the Digital Technology Services Department and/or the Oneida Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

2.2.3. Shall a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

2.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

2.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to clear desk/screens.

2.3. Definitions

2.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) “Authorized Individual” means a person who has the proper authorization to access, handle, or remove Sensitive Information from devices that transmit or print such information.
- (b) “Information Systems” means systems used to store, process, and manage information, including computers, networks, and databases.
- (c) “Removable Storage Media” means devices such as flash drives, removable media, tablets, and cellular phones that can store electronic data and be physically removed from a workstation.
- (d) “Secure Storage Areas” means areas where sensitive information is stored that shall remain locked or digitally secured when staff are away from their work areas.

- (e) “Sensitive Information” means information (both hardcopy and electronic) that shall be protected from unauthorized access or disclosure. This includes private, non-public, or confidential data.
- (f) “Staff” means any individual who uses the technology resources of the Nation, including but not limited to employees, independent contractor personnel, interns, members of boards, committees or commissions, volunteers, guests, and visitors.
- (g) “Unauthorized Access” means access to Sensitive Information by individuals who do not have the proper authorization or clearance.
- (h) “Unauthorized Disclosure” means the release or sharing of Sensitive Information to individuals who are not authorized to receive it.

2.4. Digital Security Office Responsibilities

2.4-1. The Digital Security Office shall ensure processes are in place to:

- (a) Identify Sensitive Information (hardcopy and electronic) that shall be protected from unauthorized access or disclosure.
- (b) Identify workstations that shall be shut down at the end of the workday and those to remain powered on at night to receive security updates.
- (c) Laptops/tablets/cellular phones containing Sensitive Information shall be secured per the **Mobile Device policy**.

2.5. Staff Responsibilities

2.5-1. Oneida Staff shall ensure that:

- (a) Sensitive or private/non-public electronic information is secured and/or removed from unauthorized disclosure or access when they leave their work areas. Staff who work with Sensitive Information shall have means to store information in a secure area when not in use. Staff shall check with their immediate supervisor or Oneida management if an employee is not sure what information shall be secured or what lockable storage is available.
- (b) Their desk and work area is clear (clear desk) of papers and removable storage media when leaving their work area unsecured. In addition, monitors shall be cleared (clear screen) to protect against unauthorized access to information or Information Systems. Screen savers shall be automatically activated after a period of inactivity. See the **Workstation Security policy** for more information.
- (c) Papers and electronically stored Sensitive Information (e.g., flash drives, removable media, tablets, cellular phones) shall be secured when Staff leave their work area. Storage areas containing Sensitive Information shall remain locked or digitally secured when Staff are away from their work areas. Keys to secure storage areas shall not be left in the lock or accessible by unauthorized personnel.
- (d) Devices that transmit or print (e.g., Fax machines, printers) Sensitive Information shall have the documents immediately removed from the device by authorized staff to prevent unauthorized disclosure or access.
- (e) Documents waiting to be shredded shall not be accessible by unauthorized staff.
- (f) Violations to this rule may be subject to disciplinary action, up to and including termination.

2.6. References

- (a) 2.6.1. COBIT EDM03.07, APO07.05, APO12.02, APO12.07, APO14.02, DSS06.07
- (b) 2.6.2. GDPR Article 25, 32

- (c) 2.6.3. HIPAA 164.308(a)(1)(ii)(A), 164.308(a)(3)(ii)(B), 164.308(a)(4)(ii)(B)
- (d) 2.6.4. ISO 27001 A.7.7
- (e) 2.6.5. NIST SP 800-37 3.1, 3.3
- (f) 2.6.6. NIST SP 800-53 AC-11, MP-2, MP-4
- (g) 2.6.7. NIST Cybersecurity Framework ID.AM-6, ID.GV-4, ID.RA-3, PR.AC-2, PR.AT-1, DE.DP-2
- (h) 2.6.8. PCI 9.4.1, 12.1.1

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Clear Desk Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Clear Desk

Name of law being interpreted: Technology Resources Law

Rule Number: 2

Other Laws or Rules that may be affected: Proposed Mobile device rule and proposed Workstation security rule.

Brief Summary of the proposed rule: The Clear Desk Rule aims to enhance security and confidentiality by ensuring that papers, digital storage devices, and screens containing sensitive or confidential information are secured when not in use. This rule mandates that workspaces be kept clear of such materials to prevent unauthorized access or disclosure.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.*

Financial Analysis for Clear Desk Rule

Type of Cost	Description/Comment	Dollar Amount
Start Up	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Oneida Nation
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Statement of Effect

Technology Resources Law Rule No. 2 – Clear Desk/Screen

Summary

The Technology Resources Law Rule No. 2 – Clear Desk/Screen sets out to improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation's laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The purpose of the Technology Resources Law Rule No. 2 – Clear Desk/Screen (“the Rule”) is to improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information. [Rule 2.1-1]. The Rule addresses:

- Digital Security Office Responsibilities [Rule 2.5];
- Staff Responsibilities [Rule 2.6]; and
- References [Rule 2.7].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 2 – Clear Desk/Screen.

Adopt Technology Resources Law - Chapter 215 - Rule # 003 - Asset Management

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
☐ Law Office	☒ DTS
☐ Gaming/Retail	☐ Boards, Committees, or Commissions
☐ Other: <i>Describe</i>	

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
2. Clear Desk
 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
 - b. Ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.
4. Security Awareness
 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
5. Password Management
 - a. Passwords play a crucial role in digital security, protecting user accounts and Oneida Nation's digital assets.
6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

NOTICES

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
 - 002–Clear Desk
 - 003–Asset Management
 - 004–Security Awareness
 - 008–Third Party Provider
 - 009–Generative AI Usage
- Who would be affected:**
- Employees and Contractors,
 - Vendors, and Third-Party Providers

**PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357**

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

As no public comments were submitted during the designated comment period, there are no comments requiring review, response, or incorporation into the proposed amendments.

This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 TECHNOLOGY RESOURCES LAW Rule #003 – Asset Management

- 3.1 Purpose and Authority
- 3.2 Adoption, Amendment and Repeal
- 3.3 Definitions
- 3.4 Asset Management
- 3.5 Enforcement
- 3.6 References

3.1 Purpose and Authority

3.1-1. *Purpose.* The purpose of this rule is to establish a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization. This ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.

3.1-2. *Authority.* The Technology Resources law delegates rulemaking authority to the Digital Technology Services Department pursuant to the Administrative Rulemaking law.

3.2. Adoption, Amendment and Repeal

3.2-1. This rule was adopted by the Oneida Business Committee in accordance with the procedures of the Administrative Rulemaking law.

3.2-2. This rule may be amended or repealed by the Digital Technology Services Department and/or the Oneida Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

3.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

3.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

3.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to Information Technology Asset Management.

3.3. Definitions

3.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) “Active discovery tool” means a tool used to identify devices connected to the network.
- (b) “Asset disposal” means the process of securely removing sensitive data from an asset before disposal, based on the data’s sensitivity level (Public, Sensitive, Confidential).
- (c) “Asset media” means small memory storage assets tracked by Data Owner rather than location, including CD/DVD disks and portable storage devices (USB flash drives).
- (d) “Asset tracking database” means a system used to track assets, including all information from the Asset Transfer Form and the date of asset change. It shall be maintained, accurate, and up-to-date.

- (e) “Asset transfer checklist” means a form filled out by the Data Owner and approved by an authorized representative when an asset is transferred. It includes details such as asset type, ID number, asset name, description, current and new locations, and data owner.
- (f) “Asset types” means categories of devices that shall be tracked, including desktop workstations, firewalls, handheld devices, mobile computers, electronic storage devices, printers, copiers, fax machines, multifunction machines, routers, scanners, servers, software (application and operating system), and network switches.
- (g) “Asset value” means the cost threshold for tracking assets.
- (h) “Data owner” means the person responsible for an asset, typically the most common user for workstations or the primary person responsible for maintenance or supervision for other equipment.
- (i) “Digital security office” means the area responsible for approving technology used to erase confidential data to ensure it is not readable.
- (j) “DTS” means Digital Technology Services.
- (k) “Enterprise software” means software used to configure systems to allow the use of small storage devices on specific Information Systems.
- (l) “Resource owners” means individuals responsible for checking the Database regularly to ensure all applicable assets are included.
- (m) “Software inventory tools” means tools used to identify and classify operating system and application software on devices.
- (n) “Storage device data owner agreement” means an agreement signed by staff to handle portable storage devices and CD/DVD disks responsibly and in accordance with the rule.
- (o) “Supported software” means software applications and operating systems currently supported and receiving vendor updates, which are added to the Database.
- (p) “Unauthorized assets” means assets not approved or tracked by the organization, which shall be removed, quarantined, or updated in the inventory.
- (q) “Unsupported software” means software that is no longer supported, which shall be removed or classified as unsupported in the database.

3.4. Asset Management

3.4-1. Asset Types. The following devices shall be tracked if they meet the rule requirements:

- (a) Desktop workstations;
- (b) Firewalls;
- (c) Handheld devices;
- (d) Mobile computers;
- (e) Electronic storage devices;
- (f) Printers, copiers, fax machines, multifunction machines;
- (g) Routers;
- (h) Scanners;
- (i) Servers;
- (j) Software (application and operating system); and
- (k) Network switches.

3.4-2. *Asset Value*. Assets with a value below a certain threshold set by Accounting shall not be tracked. However, all data-storing assets shall be tracked, including:

- (a) Hard drives;
- (b) Temporary storage drives;

- (c) Data tapes (including system backups); and
- (d) Other storage devices like CD/DVD disks and USB flash drives are covered for disposal and secure storage purposes.

3.4-3. *Asset Media.*

- (a) Small memory storage assets are tracked by the data owner, not location. Enterprise software should configure systems to allow specific Information Systems to use these assets, including:
 - (1) CD/DVD disks; and
 - (2) Portable storage devices (USB flash drives).
- (b) If permitted for staff, the data owner or area supervisor shall authorize these devices. Staff shall handle these devices responsibly and follow the following guidelines:
 - (1) Do not place sensitive data on them without authorization. If sensitive data is placed, obtain special permission and keep the device secure.
 - (2) Do not use these devices to transport executable programs from outside the network without authorization and scanning with approved anti-virus and malware scanners. Only use programs on the DTS department's approved list.
 - (3) Staff shall sign the storage device data owner agreement, agreeing to handle these devices per rule. This form is submitted when staff begin working with the Nation's data or receive portable storage devices or data backup drives.

3.4-4. *Asset Tracking Requirements.*

- (a) All assets shall have a unique identifier, such as an internal tracking number or a manufacturer-provided ID and a means to track them.
- (b) An asset tracking database shall track assets, including all information from the Asset Transfer Form and the date of asset change.
- (c) The asset tracking system shall be maintained, accurate, and up-to-date, including all hardware and software assets, whether connected to the network or not. Unauthorized assets shall be removed, quarantined, or updated in the inventory. When an asset is acquired, it will be assigned an ID and added to the asset tracking system.
- (d) All assets shall have an assigned owner.
- (e) Supported software applications and operating systems shall be added to the database.
- (f) Unsupported software shall be removed or classified as unsupported.

3.4-5. *Transfer Procedure.*

- (a) When an asset is transferred, the data owner shall complete an asset transfer checklist and obtain approval from their supervisor or designated approver. The data owner is responsible for the asset. For workstations, this is typically the primary user. For other equipment, it is the individual responsible for its maintenance or oversight.
- (b) The data owner shall complete the asset transfer checklist, indicating if the asset is new, moving to a new location, being transferred to a new data owner, or being disposed of. The following information shall be included on the asset transfer checklist:
 - (1) Asset Type
 - (2) ID number;
 - (3) Asset Name;
 - (4) Asset Description;
 - (5) Current Location;
 - (6) Designated Data Owner;
 - (7) New Location;

- (8) New Data Owner; and
- (9) Locations of Sensitive Data.
- (c) *Approval*. Once completed and signed by the data owner, a designated representative shall sign the form.
- (d) *Data entry*. The completed form is given to the database manager, who ensures the information is entered into the database within one (1) week.
- (e) *Database*. An active discovery tool shall identify devices connected to the network. Software inventory tools shall classify operating system and application software. The database shall be updated based on these tools' results. Automated tools shall update the database where possible. Resource owners shall regularly check the database to ensure all applicable assets are included.

3.4-6. *Asset Transfers*.

- (a) This rule applies to any asset transfers, including:
 - (1) Asset purchase;
 - (2) Asset relocation;
 - (3) Change of asset data owner (e.g., when staff leave or are replaced); and
 - (4) Asset disposal.
- (b) In all cases, the asset transfer checklist shall be completed.

3.4-7. *Asset Disposal and Repurposing*.

- (a) Procedures for secure disposal or repurposing of equipment and resources shall be established before tenant assignment or jurisdictional transport.
- (b) Sensitive data shall be removed before asset disposal. The user's manager shall determine the data's maximum sensitivity level.
- (c) Actions to be made based on data sensitivity:
 - (1) *Public*. No requirement to erase data, but normally erase using any means (e.g., reformatting or degaussing).
 - (2) *Sensitive*. Erase data using any means (e.g., reformatting or degaussing).
 - (3) *Confidential*. Erase data using approved technology to ensure it is unreadable, as approved by the Digital Security Manager.

3.5. Enforcement

3.5-1. Any staff member found to have violated this rule may be subject to disciplinary action, up to and including termination.

3.6. References

3.6-1. References include:

- (a) COBIT APO01.06, APO09.03, BAI09.01, BAI09.02-03, DSS04.07, DSS05.04-05, DSS06.06
- (b) GDPR Article 25, 32
- (c) HIPAA 164.308(a)(1)(ii)(B)
- (d) ISO 27001 A.5.17, A.8.3-5, A.8.18
- (e) NIST SP 800-37 3.1, 3.3
- (f) NIST SP 800-53 CM-8, PL-4
- (g) NIST Cybersecurity Framework ID.AM, PR.PT, DE.DP-2, DE.CM-1-2, RS.RP-1
- (h) PCI 1.1.2

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Asset Management Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Asset Management

Name of law being interpreted: Technology Resources Law

Rule Number: 3

Other Laws or Rules that may be affected: n/a

Brief Summary of the proposed rule: Establish a comprehensive framework for the effective management, tracking, and security of IT assets within Oneida Nation.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.

Financial Analysis for Asset Management

Type of Cost	Description/Comment	Dollar Amount
Start Up Costs	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation Costs	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Technology Resources Law Rule No. 3 – Asset Management

Summary

The Technology Resources Law Rule No. 3 – Asset Management establish a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation's laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The purpose of the Technology Resources Law Rule No. 3 – Asset Management (“the Rule”) is to establish a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization. [Rule 3.1-1]. The Rule addresses:

- Asset Management [Rule 3.4];
- Enforcement [Rule 3.5]; and
- References [Rule 3.6].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 3 – Asset Management.

Adopt Technology Resources Law - Chapter 215 - Rule # 004 - Security Awareness Training**Business Committee Agenda Request**

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
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5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

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6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
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| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
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 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
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 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
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6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
 - 002–Clear Desk
 - 003–Asset Management
- 004–Security Awareness
 - 008–Third Party Provider
 - 009–Generative AI Usage

Who would be affected: Employees and Contractors, Vendors, and Third-Party Providers

**PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357**

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

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This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 TECHNOLOGY RESOURCES LAW Rule #004 – Security Awareness Training

- 4.1 Purpose and Authority
- 4.2 Adoption, Amendment and Repeal
- 4.3 Definitions
- 4.4 Requirements & Responsibilities
- 4.5 Enforcement
- 4.6 References

4.1 Purpose and Authority

4.1-1. *Purpose.* A robust security program necessitates that staff are trained in security policies, procedures, and technical controls. Oneida Nation staff who manage digital information shall possess the skills required for their roles. The aim of this Security Awareness and Training Rule is to ensure that security awareness and training measures safeguard Information Resources, maintaining their availability, confidentiality, and integrity.

4.1-2. *Authority.* The Technology Resources Law delegates rulemaking authority to the Digital Technology Services Department pursuant to the Administrative Rulemaking law.

4.2. Adoption, Amendment and Repeal

4.2-1. This rule was adopted by the Oneida Business Committee in accordance with the procedures of the Administrative Rulemaking law.

4.2-2. This rule may be amended or repealed by the Digital Technology Services Department and/or the Oneida Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

4.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

4.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

4.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to security awareness training as outlined in the Technology Resources Law.

4.3. Definitions

4.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) “Department” means the DTS Digital Technology Services department which is responsible for overseeing information security policies and procedures.
- (b) Digital Security Office: The area designated to oversee the security of Digital Information Resources, ensuring the security program is well-supported with adequate resources and budget.
- (c) Information Resources: Digital data and information systems that are used, managed, and protected by the organization.

- (d) Security Awareness and Training Plan (Plan): A documented strategy outlining the process for staff security training, education, and awareness to ensure they understand their roles and responsibilities in protecting Information Resources.
- (e) Information Security Management System (ISMS): A systematic approach to managing sensitive company information so that it remains secure. It includes people, processes, and IT systems by applying a risk management process.
- (f) Social Engineering Attacks: Manipulative tactics used by attackers to trick individuals into divulging confidential or personal information that may be used for fraudulent purposes. Examples include phishing, phone scams, and impersonation calls.
- (g) BYOD (Bring Your Own Device): A Rule that defines the use of personal devices (such as smartphones, tablets, and laptops) for work purposes, which introduces specific security risks and responsibilities.
- (h) Cloud Computing Security: Measures and protocols designed to protect data, applications, and services hosted in the cloud from threats and vulnerabilities. This includes addressing multi-tenant environments, nationality issues, and different cloud delivery models.
- (i) Skills Gap Analysis: An assessment process to identify the difference between the skills required for a job and the actual skills possessed by employees. This helps in developing targeted training programs to bridge the gap.
- (j) Secure Authentication: Methods used to verify the identity of a user, ensuring that only authorized individuals can access sensitive information. This includes passwords, biometrics, and multi-factor authentication.
- (k) Security Incidents: Events that indicate a possible breach of information security policies or failure of safeguards, which may compromise the confidentiality, integrity, or availability of information resources.
- (l) DTS Department: The department responsible for preparing and distributing information security manuals and ensuring staff are aware of security policies and procedures.

4.4. Requirements and Responsibilities

4.4-1. Management Responsibilities

- (a) Oneida Nation management shall prioritize effective security awareness and training.
- (a) Management shall implement a robust security program with a strong awareness and training component.
- (b) The Digital Security Office shall be designated to oversee the security of Digital Information Resources.
- (c) The Digital Security Office shall ensure the security program is well-supported with adequate resources and budget.

4.4-2. Digital Security Office Responsibilities

- (b) Develop, implement, and maintain a Security Awareness and Training Plan (Plan).
- (c) Ensure the Plan documents the process for staff security training, education, and awareness.
- (d) Ensure staff understand their roles and responsibilities in protecting Information Resources.

- (e) Maintain continuous and engaging communication relevant to the information security management system (ISMS).

4.4-3. Training and Awareness:

- (a) Provide regular training, reference materials, and reminders to staff.
- (b) Training topics shall include:
 - (1) Oneida Nation's responsibilities for protecting Information Resources.
 - (2) Risks to Information Resources.
 - (3) Identifying social engineering attacks (e.g., phishing, phone scams).
 - (4) Secure use of Information Resources.
 - (5) Information security policies, procedures, and best practices.

4.4-4. Training Requirements:

- (a) New users shall attend an approved security awareness training class within 90 days of being granted access to Information Resources.
- (b) Staff shall receive role-specific training and verify their understanding and compliance.
- (c) Staff shall be trained to identify, report, and prevent security incidents.
- (d) Staff shall understand the importance of secure authentication and proper handling of sensitive information.
- (e) Security policies, procedures, and manuals shall be readily available for staff reference.
- (f) Staff shall attend annual security awareness training, with attendance records maintained.
- (g) Staff shall sign an acknowledgment of understanding Oneida Nation's security policies and procedures.

4.4-5. Additional Training Components:

- (a) The DTS Department shall prepare and distribute information security manuals.
- (b) Cloud computing security awareness training shall address multi-tenant, nationality, and cloud delivery models.
- (c) Staff shall be aware of BYOD risks and responsibilities.
- (d) Staff shall understand actions for standalone, lost, and misplaced equipment.

4.4-6. Digital Security Office Duties:

- (a) Conduct a skills gap analysis to identify training needs and develop an education roadmap.
- (b) Maintain a communication process for new security programs and updates.
- (c) Ensure staff responsible for implementing security safeguards receive formal training.
- (d) Provide periodic security reminders to keep staff updated on threats and best practices.
- (e) Collect and incorporate training feedback into future sessions.

4.5. Enforcement:

- (a) Any Staff member found to have violated this rule may be subject to disciplinary action, up to and including termination.

4.6. References:

- a) COBIT EDM01.03, APO02.08, APO07.12-13, APO12.02, APO12.07, APO13.07, MEA02.11
- b) GDPR Article 25, 32
- c) HIPAA 164.308(a)(5)(i), 164.308(a)(5)(ii)(A), 164.308(a)(5)(ii)(D)
- d) ISO 27001 7.3, A.5.23, A.6.3, A.8.7, A.8.16
- e) NIST SP 800-37 3.3, 3.4, 3.5, 3.7
- f) NIST SP 800-53 AT-2, AT-3, CP-3, IR-2, PM-13, SI-3, SI-4(24), SR-1
- g) NIST Cybersecurity Framework ID.GV-1, PR.AT-1-5, DE.DP-1, RS.RP-1, RS.MI-2
- h) PCI 6.2.2, 9.1.1, 12.10.4, A3.1.4

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Security Awareness Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Security Awareness Training

Name of law being interpreted: Technology Resources Law

Rule Number: 4

Other Laws or Rules that may be affected: n/a

Brief Summary of the proposed rule: A robust security program requires that staff are trained in security policies, procedures, and technical controls. Oneida Nation staff who manage digital information must possess the skills required for their roles.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.*

Financial Analysis for Security Awareness

Type of Cost	Description/Comment	Dollar Amount
Start Up Costs	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation Costs	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Technology Resources Law Rule No. 4 – Security Awareness Training

Summary

The Technology Resources Law Rule No. 4 – Security Awareness Training ensure that security awareness and training measures safeguard Information Resources, maintaining their availability, confidentiality, and integrity.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation's laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The purpose of the Technology Resources Law Rule No. 4 – Security Awareness Training (“the Rule”) is to ensure that security awareness and training measures safeguard Information Resources, maintaining their availability, confidentiality, and integrity. [Rule 4.1-1]. The Rule addresses:

- Requirements and Responsibilities [Rule 4.4];
- Enforcement [Rule 4.5]; and
- References [Rule 4.6].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 4 – Security Awareness Training.

Adopt Technology Resources Law - Chapter 215 - Rule # 008 - Third Party Providers

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
☐ Law Office	☒ DTS
☐ Gaming/Retail	☐ Boards, Committees, or Commissions
☐ Other: <i>Describe</i>	

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
2. Clear Desk
 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
 - b. Ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.
4. Security Awareness
 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
5. Password Management
 - a. Passwords play a crucial role in digital security, protecting user accounts and Oneida Nation's digital assets.
6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

NOTICES

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
- 002–Clear Desk
- 003–Asset Management
- 004–Security Awareness
- 008–Third Party Provider
- 009–Generative AI Usage

Who would be affected: Employees and Contractors, Vendors, and Third-Party Providers

PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

As no public comments were submitted during the designated comment period, there are no comments requiring review, response, or incorporation into the proposed amendments.

This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 TECHNOLOGY RESOURCES LAW Rule #008 – Third Party Providers

- 8.1 Purpose and Authority
- 8.2 Adoption, Amendment and Repeal
- 8.3 Definitions
- 8.4 Digital Security Dept Responsibilities
- 8.5 Scope
- 8.6 Third Party Service Provider Reqs
- 8.7 Enforcement
- 8.8 References

8.1 Purpose and Authority

8.1-1. Purpose. Third party service providers are integral to supporting Oneida Nation's infrastructure and information services. In some cases, these providers may collect, store, and maintain Sensitive Information. This rule establishes guidelines to limit and control third party service providers to minimize risks such as revenue loss, liability, loss of trust, and embarrassment to Oneida Nation, while ensuring the responsible use of company information and resources.

8.1-2. Authority. The Technology Resources Law delegates rulemaking authority to the Digital Security Department pursuant to the Administrative Rulemaking law.

8.2 Adoption, Amendment and Repeal

8.2-1. This rule was adopted by the Oneida Nation Business Committee in accordance with the procedures of the Administrative Rulemaking law.

8.2-2. This rule may be amended or repealed by the Digital Security Department and/or the Oneida Nation Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

8.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

8.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

8.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to third party providers as outlined in the Technology Resources Law.

8.3 Definitions

8.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) Third Party Service Provider: Any external entity contracted to collect, store, process, manage, or dispose of Oneida Nation's information.
- (b) Sensitive Information: Confidential or proprietary data owned by Oneida Nation or its customers.
- (c) Information Resources: DTS systems, networks, applications, and data managed by Oneida Nation.

- (d) Digital Security Office: The department or personnel responsible for overseeing DTS operations and third party assessments.
- (e) Cyber Security Risk Assessment (CSRA): A process of identifying, analyzing, and prioritizing potential threats and vulnerabilities to an organization's information systems, data, and digital infrastructure to reduce the likelihood and impact of cyberattacks.

8.4 Digital Security Office Responsibilities

8.4-1. The Digital Security Office shall ensure:

- (a) Maintain a list of all third party service providers and their services as they relate to digital technology.
- (b) Retain records of assessments and audits of third party service providers.
- (c) Assign a DTS point of contact to ensure compliance with this rule.
- (d) Monitor and enforce third party adherence to applicable Oneida Nation policies and agreements.
- (e) Cyber security risk assessments are conducted during the purchasing process and repeated as necessary such as when the scope of products, services, or technology changes.

8.5 Scope

8.5-1. This rule applies to all Oneida Nation Staff responsible for reviewing, purchasing, installing, operating, or maintaining digital information resources, and to all third party service providers handling Oneida Nation information.

8.5-2. Third party service providers with remote or on-site access to Oneida Nation systems shall comply with this rule, regardless of location.

8.6 Third Party Service Provider Requirements

8.6-1. Due Diligence.

- (a) Prior to engagement, Oneida Nation Staff shall conduct due diligence on third party service providers, including background checks, business history, and experience with similar engagements.

8.6.2. Rule Compliance.

- (a) Service providers shall comply with all applicable Oneida Nation policies, including but not limited to:
 - (1) Acceptable Use Rule
 - (2) Password Policy
 - (3) Vendor Remote Access Rule

8.6.3. Agreement Specifications.

- (a) Agreements with service providers shall include:
 - (1) Confidentiality clauses protecting Oneida Nation and customer information.
 - (2) Controlled access to Information Resources.
 - (3) Methods for protecting Information Resources.
 - (4) Acceptable processes for return, destruction, or disposal of Oneida Nation information at agreement end.
 - (5) Restriction of information use to the purpose of the agreement only.
 - (6) Prohibition on using or sharing Oneida Nation information for other purposes.

(7) Defined service levels (SLA) and change control processes.

(b) Service providers shall notify Oneida Nation within five (5) working days of a security breach, with Oneida Nation reserving the right to terminate the agreement. If customer information is involved, the provider shall cover remediation costs, including customer notifications and one year of free credit monitoring.

8.6.4. Staff Management

(a) Service providers shall provide and update a list of staff working on Oneida Nation services within 24 hours of changes.

(b) On-site provider staff shall obtain and display Oneida Nation identification badges, returning them upon departure.

(c) Staff handling Sensitive Information shall be cleared and have access activated only when needed, deactivated post-service.

8.6.5. Access Controls

(a) Remote access accounts shall be enabled only during use and disabled when not needed, with unique credentials per client.

(b) Access to Information Systems shall be monitored and comply with the Oneida Nation Password policy.

(c) Major activities shall be logged in the Third Party Service Provider Log, including personnel changes, password updates, and milestones.

8.6-6. Security and Incident Reporting.

(a) Service provider personnel shall report security incidents to Oneida Nation immediately.

(b) Incident management responsibilities shall be outlined in the agreement if applicable.

(c) Health information handling requires online and print descriptions of security and privacy safeguards.

8.6-7. Termination Procedures.

(a) Upon staff departure or agreement termination, Sensitive Information shall be returned or destroyed within 24 hours, with written certification provided.

(b) All Oneida Nation badges, access cards, and equipment shall be surrendered immediately, with exceptions documented by management.

8.6-8. Auditing and Ethical Use.

(a) Service providers shall comply with state and Oneida Nation auditing requirements.

(b) Agreements shall include security controls (e.g., encryption, access restrictions) to prevent data breaches or misuse.

8.7 Enforcement

8.7-1. Any Oneida Nation Staff member violating this rule may face disciplinary action, up to and including termination.

8.8. References

(a) COBIT APO09.05, APO10.05, APO12.02, APO13.07, BAI02.05-06, DSS01.05, DSS05.07

(b) GDPR Article 25, 26, 28, 32

(c) HIPAA 164.308(a)(1)(ii)(A), 164.308(b)(4), 164.502(b)(1), ARRA 13404(b), ARRA 13405(b)

- (d) ISO 27001 8.1, A.8.12, A.8.21, A.8.30
- (e) NIST SP 800-37 3.3, 3.7
- (f) NIST SP 800-53 CM-4, IR-4, PM-30, PS-7, RA-9, SA-4, SA-10-12, SA-15, SA-17, SR-1
- (g) NIST Cybersecurity Framework ID.AM-4-6, ID.BE-4, ID.RA-4, ID.RM-1, ID.SC-3-4, DE.CM-6
- (h) PCI 12.5.2, A1.1.1, A2.1.2-3, PCI Software Security Framework

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Third Party Providers Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Third Party Providers

Name of law being interpreted: Technology Resources Law

Rule Number: 8

Other Laws or Rules that may be affected:

Brief Summary of the proposed rule: Establish guidelines to limit and control third party service providers to minimize risks such as revenue loss, liability, loss of trust, and embarrassment to Oneida Nation, while ensuring the responsible use of the Tribe's information and resources.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.*

Financial Analysis for Third Party Providers

Type of Cost	Description/Comment	Dollar Amount
Start Up Costs	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation Costs	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Statement of Effect

Technology Resources Law Rule No. 8 – Third Party Providers

Summary

The Technology Resources Law Rule No. 8 – Third Party Providers establishes guidelines to limit and control third party service providers to minimize risks such as revenue loss, liability, loss of trust, and embarrassment to Oneida Nation, while ensuring the responsible use of company information and resources.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation's laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The purpose of the Technology Resources Law Rule No. 8 – Third Party Providers (“the Rule”) is to establish guidelines to limit and control third party service providers to minimize risks such as revenue loss, liability, loss of trust, and embarrassment to Oneida Nation, while ensuring the responsible use of company information and resources. [Rule 8.1-1]. The Rule addresses:

- Digital Security Department Responsibilities [Rule 8.4];
- Scope [Rule 8.5];
- Third Party Service Provider Requirements [Rule 8.6];
- Enforcement [Rule 8.7]; and
- References [Rule 8.8].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 8 – Third Party Providers.

Adopt Technology Resources Law - Chapter 215 - Rule # 009 - Generative AI Usage

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Personnel Related

3. Requested Motion:

☐ Accept as information; OR

Consider the adoption of the following Technology Resources Law Rules:
Technology Resources Law Rule No. 1 – Acceptable Use;
Technology Resources Law Rule No. 2 – Clear Desk/Screen;
Technology Resources Law Rule No. 3 – Asset Management;
Technology Resources Law Rule No. 4 – Security Awareness Training;
Technology Resources Law Rule No. 8 – Third Party Providers; and
Technology Resources Law Rule No. 9 – Generative AI Usage

4. Areas potentially impacted or affected by this request:

☐ Finance	☐ Programs/Services
☐ Law Office	☒ DTS
☐ Gaming/Retail	☐ Boards, Committees, or Commissions
☐ Other: <i>Describe</i>	

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|--|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☒ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Jameson Wilson, Councilman

Primary Requestor: Clorissa N. Leeman, LRO Senior Staff Attorney

Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jason W. Doxtator, Chief Information Officer
Date: 07/27/2026
Re: **Approval of Proposed Technology Resources Law - Security Rules**

CC: Mark Powless, CEO Nation Services; Ralinda Ninham-Lamberies, CFO; James Petitjean, CEO Retail; Taryn Webster, CEO Oneida Casino Hotel; Laura Laitinen-Warren, CEO Human Resources

Purpose:

Following a comprehensive review of the proposed security rules governing technology resources, I am formally approving the framework as outlined. This decision is based on alignment with current Oneida Nation cybersecurity directives, regulatory standards, and best practices in digital security governance.

Summary of Approval:

The proposed rules incorporate a robust structure of governance that is essential for maintaining the integrity, confidentiality, and availability of our digital assets. These components are consistent with Oneida Nation's cybersecurity initiatives and legal mandates.

Key Elements of the Approved Rules:

1. Acceptable Use
 - a. Provides guidelines and techniques to promote effective use of Nation's Technology Systems
2. Clear Desk
 - a. To improve security and confidentiality, whenever possible for papers, digital storage devices, and screens which contain sensitive or confidential information.
3. Asset Management
 - a. Establishes a comprehensive framework for the effective management, tracking, and security of Information Technology assets within the organization.
 - b. Ensures the protection of sensitive data, compliance with applicable laws and regulations, and the efficient use of technology resources to support the mission and operations of the Nation.
4. Security Awareness
 - a. A robust security program necessitates that staff are trained in security policies, procedures, and technical controls.
5. Password Management
 - a. Passwords play a crucial role in digital security, protecting user accounts and Oneida Nation's digital assets.
6. Generative AI Usage
 - a. Outlines the proper use of AI technologies while working at Oneida Nation the goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

Implementation and Oversight:

The Digital Security Office will oversee the implementation of these rules, upon the Oneida Nations LOC acceptance and adoption.

Please consider this memo as formal approval to proceed with the implementation of the proposed security rules. I appreciate the committee's diligence in crafting a framework that strengthens our digital resilience while upholding legal and ethical standards.

Rule Procedural Timeline:

- Statement of Effects Provided: March 3, 2026
- Public Meeting Notice Published in Kalihwisaks: July 2026 edition [Published on June 30, 2026]
- Public Meeting Held: July 23, 2026
- Public Comment Period Closure: August 4th, 2026

NOTICES

PUBLIC MEETING NOTICE – 9am, Thurs., July 23, 2026

In accordance with the Administrative Rulemaking Law, the Digital Technology Services Department is hosting this Public Meeting to gather feedback from the community regarding THE FOLLOWING PROPOSED RULES to the Technology Resources Law

This is a proposal to adopt rules which would:

- Establish clear standards for responsible and secure use of digital technology.
- Promote data protection and reduce the risk of unauthorized access or data breaches.
- Ensure proper tracking and disposal of IT assets.
- Require ongoing security awareness training for employees.
- Regulate secure access and evaluate risk for vendors and third-party providers.
- Govern the ethical and secure use of generative AI technologies.

Individuals may attend the public meeting for the proposed amendments to the Technology Resources Law in person at the Skenandoah Complex or virtually through Microsoft Teams (MT). If you wish to attend the public meeting through MT, email infosec@oneidanation.org

For more information on the proposed Technology Resources Law amendments, please review the public meeting packet at www.oneida-nsn.gov/Register/PublicMeetings or email infosec@oneidanation.org for electronic copies.

- 001–Acceptable Use
 - 002–Clear Desk
 - 003–Asset Management
 - 004–Security Awareness
 - 008–Third Party Provider
 - 009–Generative AI Usage
- Who would be affected:
- Employees and Contractors,
 - Vendors, and Third-Party Providers

**PUBLIC COMMENT PERIOD OPEN UNTIL
TUESDAY, AUGUST 4, 2026
DTS DIGITAL SECURITY
909 PACKERLAND DR. • GREEN BAY, WI 54303
InfoSec@OneidaNation.org • 920.869.4357**

During the public comment period, anyone may submit written comments, questions, or input. Comments may be submitted to the Oneida Nation DTS Office or the Skenandoah Front Desk in person, by U.S. mail, interoffice mail, or e-mail.



Memorandum

To: Oneida Nation Legislative Operating Committee (LOC)
From: Jesse Kujawa, Digital Technology Services Security Analyst
Date: 08/10/2026
Re: **Public Comment Period for Amendments to the Technology Resources Law**

This memorandum serves as documentation that the public comment period regarding the proposed amendments to the Technology Resources Law was completed in accordance with applicable procedures and timeframes.

Upon the close of the public comment period, no comments, concerns, recommendations, or objections were received from members of the public, stakeholders, or other interested parties regarding the proposed amendments.

As no public comments were submitted during the designated comment period, there are no comments requiring review, response, or incorporation into the proposed amendments.

This memorandum is being provided for the official record and to document the completion of the public comment process.



Title 2. Employment – Chapter 215 TECHNOLOGY RESOURCES LAW Rule #009 – Generative AI Usage

- 9.1 Purpose and Authority
- 9.2 Adoption, Amendment and Repeal
- 9.3 Definitions
- 9.4 Digital Security Dept Responsibilities
- 9.5 Scope
- 9.6 Usage Options
- 9.7 Prohibited Activities
- 9.8 References

9.1 Purpose and Authority

9.1-1. Purpose. With the increasing popularity of generative AI services such as OpenAI's ChatGPT and DeepSeek, as well as other AI tools and applications, it has become necessary to outline the proper use of such technologies while working at Oneida Nation. While we remain committed to adopting new technologies to aid our mission when possible, we also understand the risks and limitations of AI and want to ensure responsible use. Our goal is to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage.

9.1-2. Authority. The Technology Resources Law delegates rulemaking authority to the Digital Security Department pursuant to the Administrative Rulemaking law.

9.2 Adoption, Amendment and Repeal

9.2-1. This rule was adopted by the Oneida Nation Business Committee in accordance with the procedures of the Administrative Rulemaking law.

9.2-2. This rule may be amended or repealed by the Digital Security Department and/or the Oneida Nation Business Committee pursuant to the procedures set out in the Administrative Rulemaking law.

9.2-3. Should a provision of this rule or the application thereof to any person or circumstances be held as invalid, such invalidity shall not affect other provisions of this rule which are considered to have legal force without the invalid portions.

9.2-4. In the event of a conflict between a provision of this rule and a provision of another rule, internal policy, procedure, or other regulation; the provisions of this rule shall control.

9.2-5. This rule supersedes all prior rules, regulations, internal policies or other requirements relating to the use of AI technologies.

9.3 Definitions

9.3-1. This section shall govern the definitions of words and phrases used within this rule. All words not defined herein shall be used in their ordinary and everyday sense.

- (a) AI Generated Content: Content created by AI tools.
- (b) AI Tools: Systems that use artificial intelligence to generate content, analyze data, or automate tasks, including but not limited to generative AI chatbots (e.g., ChatGPT), image generators, and data analysis platforms.
- (c) Approved AI Tools: AI tools authorized for use by Oneida Nation staff.
- (d) Digital Security Department: The department responsible for overseeing the implementation and maintenance of digital security policies and procedures.
- (e) Proprietary Company Data: Confidential or sensitive information owned by Oneida Nation.

9.4 Digital Security Office Responsibilities

9.4-1. The Digital Security Office shall ensure:

- (a) Rules, policies, and procedures manage the process of using AI tools responsibly.
- (b) Rules, policies, and procedures prevent staff from sharing proprietary company data with AI tools.
- (c) Procedures advise staff on the proper use of AI tools and the importance of verifying AI-generated content. This includes providing mandatory annual training on AI tool usage, risks, and verification processes.
- (d) Rules, Policies, and procedures indicate when AI tools shall be supplemented with additional access controls. Examples of additional access controls include multi-factor authentication, encryption, or restricting access to authorized personnel only.

9.5 Scope

9.5-1. This rule applies to all Oneida Nation employees and contractors and to all work associated with Oneida Nation that those employees perform, whether on or off company premises.

9.5-2. Employees using AI tools on personal devices or remote networks shall comply with Digital Security Department guidelines for secure access and data protection.

9.6 Usage Options

9.6-1. Limited Use.

- (a) Limited use of AI tools approved by the Digital Technology Services Department will be allowed while performing work for Oneida Nation with the approval of your supervisor. Oneida Nation system credentials should be used to create an account with this technology. Company data may be submitted (copied, typed, etc.) into this platform.
- (b) Employees wishing to use AI tools shall inform their supervisor for prior approval explaining how the tool will be used.
- (c) All AI-generated content shall be reviewed for accuracy before relying on it for work purposes. If a reliable source cannot be found to verify factual information generated by the AI tool, that information cannot be used for work purposes. Verification requires

cross-checking AI-generated content against reliable, independent sources or expert review, documented as part of the approval process.

9.6.2 Acceptable Use Examples:

- (a) For general-knowledge questions meant to enhance your understanding of a work-related topic.
- (b) To brainstorm ideas related to projects you are working on.
- (c) To create formulas for Excel spreadsheets or similar programs.
- (d) To develop or debug code, to be verified before deployment.
- (e) To draft an email or letter.
- (f) To summarize online research or to create outlines for content projects to assist in full coverage of a topic. Only content written by employees may be included in a final product.
- (g) To generate initial drafts of reports or presentations.
- (h) To translate work-related documents for review.

9.6.2. Restricted Use.

- (a) Use of AI tools will be allowed while performing work for Oneida Nation only with prior approval by the Digital Security Department. Oneida Nation system credentials should not be used to create an account with this technology. Company data should not be submitted (copied, typed, etc.) into these platforms. Restricted Use applies to experimental or unvetted AI tools, requiring additional Digital Security Department evaluation for security and compliance.
- (b) Employees wishing to use AI tools shall inform their supervisor for prior approval explaining how the tool will be used.
- (c) All AI-generated content shall be reviewed for accuracy before relying on it for work purposes. If a reliable source cannot be found to verify factual information generated by the AI tool, that information cannot be used for work purposes. Verification requires cross-checking AI-generated content against reliable, independent sources or expert review, documented as part of the approval process.

9.6.3. Ethical Use.

- (a) Employees shall use AI tools in accordance with all Oneida Nation's conduct and antidiscrimination policies. These technologies shall not be used to create content that is inappropriate, discriminatory, or otherwise harmful to others or the company. Such use will result in disciplinary action, up to and including termination. Employees shall report suspected unethical use of AI tools to the Digital Technology Services Department or a designated ethics officer within 24 hours.

9.7 Prohibited Activities

9.7-1. Employees shall not engage in dangerous, illegal, or discriminatory activities or otherwise violate applicable law or regulations. This includes generating or distributing content that:

- (a) Relates to child sexual abuse or exploitation.
- (b) Facilitates violent extremism or terrorism.
- (c) Facilitates non-consensual intimate imagery.
- (d) Facilitates self-harm.
- (e) Facilitates illegal activities or violations of the law, such as providing instructions for synthesizing or accessing illegal or regulated substances, goods, or services.

(f) Violates the rights of others, including privacy and intellectual property rights, such as using personal data or biometrics without legally required consent.

(g) Tracks or monitors people without their consent.

(h) Makes automated decisions that have a materially detrimental impact on individual rights without human supervision in high-risk domains, such as such as employment decisions, healthcare services, financial allocations, or tribal governance processes affecting individual rights.

9.7-2. Employees shall not compromise the security of others' or Oneida Nation's services. This includes generating or distributing content that facilitates:

(a) Spam, phishing, or malware.

(b) Abuse of, harm to, interference with, or disruption to [Company Name]'s or others' infrastructure or services.

(c) Circumvention of abuse protections or safety filters, such as manipulating the model to contravene our policies.

9.7-3. Employees shall not engage in sexually explicit, violent, hateful, or harmful activities. This includes generating or distributing content that facilitates:

(a) Hatred or hate speech.

(b) Harassment, bullying, intimidation, abuse, discrimination, or the insulting of others.

(c) Violence or the incitement of violence.

(d) Sexually explicit content, such as content created for the purpose of pornography or sexual gratification.

9.7-4. Employees shall not engage in misinformation, misrepresentation, or misleading activities which includes fraud, scams, or other deceptive actions.

9.7-5. Employees shall not use AI tools in ways that perpetuate bias or discrimination, such as generating content that unfairly targets or misrepresents individuals or groups

9.8. Enforcement

- (a) Any violation of this rule will result in disciplinary action, up to and including termination.

9.9. References

- (a) HIPAA Rule 45 CFR § 164.502, 45 CFR § 164.308, 45 CFR § 164.508

End.

Original effective date: [add effective date established by authorized entity] (Certified by LOC on)

Summary Report for Generative AI Usage Rule

Original effective date: Ten days after rule adoption.

Amendment effective date:

Name of Rule: Generative AI Usage

Name of law being interpreted: Technology Resources Law

Rule Number: 9

Other Laws or Rules that may be affected:

Brief Summary of the proposed rule: With the increasing popularity of generative AI chatbots such as OpenAI's ChatGPT and DeepSeek, as well as other AI tools and applications, this rule outlines the proper use of such technologies while working at Oneida Nation.

Statement of Effect: Obtained after requesting from the Legislative Reference Office.

Financial Analysis: See Attached.

Note: *In addition- the agency must send a written request to each entity which may be affected by the rule- asking that they provide information about how the rule would financially affect them. The agency must include each entity's response in the financial analysis. If the agency does not receive a response within 10 business days after the request is made, the financial analysis can note which entities did not provide a response.*

Financial Analysis for Generative AI Usage

Type of Cost	Description/Comment	Dollar Amount
Start Up	N/A	\$0.00
Personnel	N/A	\$0.00
Office	N/A	\$0.00
Documentation	N/A	\$0.00
Estimate of time necessary for an individual or agency to comply with the rule after implementation	Estimated 3 months to 9 months	
Other, please explain		
Total	Annual Net Revenue	\$0.00



Oneida Nation
Oneida Business Committee
Legislative Operating Committee
PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect

Technology Resources Law Rule No. 9 – Generative AI Usage

Summary

The Technology Resources Law Rule No. 9 – Generative AI Usage outlines proper use of Artificial Intelligence (AI) technologies while working for the Nation.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: March 5, 2026

Analysis by the Legislative Reference Office

The Administrative Rulemaking law provides authorized agencies the opportunity to promulgate rules interpreting the provisions of any law enforced or administered by it; provided that, a rule may not exceed the rulemaking authority granted under the law for which the rule is being promulgated. [1 O.C. 106.4-1]. Rulemaking authority is defined as the delegation of authority to authorized agencies found in the Nation’s laws, other than the Administrative Rulemaking law, which allows authorized agencies to implement, interpret and/or enforce a law of the Nation. [1 O.C. 106.3-1(i)]. An authorized agency is defined as any board, committee, commission, department, program or officer of the Nation that has been granted rulemaking authority. [1 O.C. 106.3-1(a)].

The Technology Resources law regulates the usage of technology resources and processed data owned and operated by the Nation. [2 O.C. 215.1-1]. It is the policy of the Nation to provide its community and employees access to the tools necessary to participate in a technological society. [2 O.C. 215.1-2]. Allowing limited personal use of these tools helps enhance the quality of the workplace and helps the Nation to retain highly qualified and skilled workers and officials, as well as to develop the technological skills of the community. *Id.* Pursuant to this law, users are permitted limited use of technology resources of the Nation for personal needs if the use does not interfere with the authorized duties of the user or official business of the Nation. *Id.* The Technology Resources law does not create a right to use technology resources of the Nation for personal use. [2 O.C. 215.1-2(a)]. The Technology Resources law in no way limits use of technology resources to fulfill authorized duties. [2 O.C. 215.9-1].

The Technology Resources law provides that the Digital Technology Services (“DTS”) is delegated administrative rulemaking authority in accordance with the Administrative Rulemaking law to promulgate rules to govern technology resources of the Nation. [2 O.C. 215.1-2(b)].

The purpose of the Technology Resources Law Rule No. 9 – Generative AI Usage (“the Rule”) is to establish proper use of Artificial Intelligence (AI) technologies while working for the Nation. [Rule 8.1-1]. This Rule sets out to protect employees, clients, suppliers, customers, and the Nation from harm, while leveraging AI to enhance efficiency, innovation, and competitive advantage. *Id.*

The Rule addresses:

- Digital Security Department Responsibilities [Rule 9.4];
- Scope [Rule 9.5];
- Usage Options [Rule 9.6];
- Prohibited Activities [Rule 9.7];
- Enforcement [Rule 9.8];
- References [Rule 9.9].

Conclusion

There are no legal bars to adopting the Technology Resources Law Rule No. 9 – Generative AI Usage.

Enter the e-poll results into the record regarding the approved travel request - Councilwoman Jennifer...

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☒ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☒ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☐ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Jennifer Webster, Councilwoman

Primary Requestor: _____

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: BPIGMAN

Bonnie M. Pigman

From: Secretary
Sent: Friday, August 7, 2026 5:27 PM
To: Tehassi Tasi Hill; Lawrence E. Barton; Lisa A. Liggins; Jameson J. Wilson; Jennifer A. Webster; Jonas G. Hill; Kirby W. Metoxen; Secretary
Cc: Danelle A. Wilson; Janice M. Decorah; David P. Jordan; Fawn L. Cottrell; Fawn J. Billie; Rhiannon R. Metoxen; Kristal E. Hill; BC_Agenda_Requests
Subject: E-POLL RESULTS: Approve the travel request – Councilwoman Jennifer Webster – Administration for Children & Family Tribal Advisory Committee Consultation – Washington, DC - August 24 - 26, 2026.
Attachments: EPOLL REQUEST Approve the travel request - Councilwoman Jennifer Webster - ACF - Washington DC - August 24-26, 2026.pdf

E-POLL RESULTS

The e-poll to Approve the travel request – Councilwoman Jennifer Webster – Administration for Children & Family Tribal Advisory Committee Consultation – Washington, DC - August 24 - 26, 2026, has carried. Below are the results:

Support: Lawrence Barton, Jonas Hill, Lisa Liggins, Kirby Metoxen, Jennifer Webster

Yawłko,

Brooke Doxtator

Governance Support & Information Manager
 Government Administrative Office (GAO)

office 920.869.4452

From: Secretary <TribalSecretary@oneidanation.org>
Sent: Thursday, August 6, 2026 8:44 AM
To: Tehassi Tasi Hill <thill7@oneidanation.org>; Lawrence E. Barton <lbarton2@oneidanation.org>; Lisa A. Liggins <lliggins@oneidanation.org>; Jameson J. Wilson <jwilson@oneidanation.org>; Jennifer A. Webster <JWEBSTE1@oneidanation.org>; Jonas G. Hill <jhill1@oneidanation.org>; Kirby W. Metoxen <KMETOX@oneidanation.org>; Secretary <TribalSecretary@oneidanation.org>
Cc: Danelle A. Wilson <DWILSON1@ONEIDANATION.org>; Janice M. Decorah <jdecora2@oneidanation.org>; David P. Jordan <djordan1@oneidanation.org>; Fawn L. Cottrell <fcottrel@oneidanation.org>; Fawn J. Billie <fbillie@oneidanation.org>; Rhiannon R. Metoxen <rmetoxe2@oneidanation.org>; Kristal E. Hill <khill@oneidanation.org>
Subject: E-POLL REQUEST: Approve the travel request – Councilwoman Jennifer Webster – Administration for Children & Family Tribal Advisory Committee Consultation – Washington, DC - August 24 - 26, 2026.

E-POLL REQUEST**Summary:**

Councilwoman Jennifer Webster is the Bemidji Area alternate representative for HHS Administration for Children & Families Tribal Advisory Committee (ACF). During the consultation ACF leadership will be able to speak directly with tribal leaders to discuss issues important to the tribes and ACF tribal programs.

Justification for E-Poll:

Consultation notice was received on August 3, 2026, and Councilwoman Webster would like to confirm travel arrangements as soon as possible.

Requested Action:

Approve the travel request – Councilwoman Jennifer Webster – Administration for Children & Family Tribal Advisory Committee Consultation – Washington, DC - August 24 - 26, 2026.

Deadline for response:

Responses are due no later than **4:30 p.m., Friday, August 7, 2026.**

Voting:

Use the voting button above, if available; OR
Reply with “Support” or “Oppose”.

Yawáko,

Brooke Doxtator

Governance Support & Information Manager
Government Administrative Office (GAO)

office 920.869.4452



CONFIDENTIALITY NOTICE: This message and any included attachments are intended only for the addressee. This message may contain privileged, confidential, or proprietary information. Unauthorized forwarding, printing, copying, distribution, or use of such information is strictly prohibited and may be unlawful. If you have received this message in error, please inform us promptly by reply e-mail, then delete the e-mail and destroy any printed copy.

Oneida Business Committee Travel Request**1. OBC Meeting Date Requested:** ___ / ___ / ___ ☒ e-poll requested**2. General Information:**Event Name: Administration for Children & Families Tribal Advisory Committee Consultation (ACF)Event Location: Washington, D.C.Attendee(s): Jennifer WebsterDeparture Date: 08/24/2026Attendee(s): Return Date: 08/26/2026Attendee(s): **3. Budget Information:**

- ☒ Funds available in individual travel budget(s)
☐ Unbudgeted
☐ Grant Funded or Reimbursed

Cost Estimate: \$ 2,241.00**4. Justification:**

Describe the justification of this Travel Request:

Councilwomen Jennifer Webster is the Bemidji Area Alternate representative for HHS Administration for Children & Families Tribal Advisory Committee.

During the consultation ACF leadership will be able to speak directly with tribal leaders to discuss issues important to the tribes and ACF tribal programs.

The consultation focus is to seek consensus, exchange view, share information, provide advice and/or recommendations to facilitate interaction related to intergovernmental responsibilities or administration of ACF programs.

This is accomplished thru meeting and conversations between Federal officials and Elected Tribal Leaders in their official capacity.

Consultation notice was received on Aug. 3, hence the request for e-poll.

Thanks,
Jenny

5. SubmissionSponsor: Jennifer Webster, Councilwoman

- 1) Save a copy of this form for your records. [Save a Copy...](#)
2) Print this form as a *.pdf OR print and scan this form in as *.pdf.
3) E-mail this form and all supporting materials in a **SINGLE** *.pdf file to: BC_Agenda_Requests@oneidanation.org

ONEIDA NATION
TRAVEL AUTHORIZATION REQUEST

General Travel Information

Name of Traveler	Jennifer Webster		
<i>Legal name as it appears on Travelers Driver's License or State ID, no nicknames</i>			
Employee Number	[REDACTED]		
Destination City	Washington, D.C.		
Departure date	08/24/2026	Return date	08/26/2026
Purpose of travel	Administration for Children & Families Tribal Advisory Committee Consultation (ACF)		
Charged GL Account	001-427200-009-701000-000		

GSA (General Services Administration) Rates are linked on SharePoint under Employee Resources

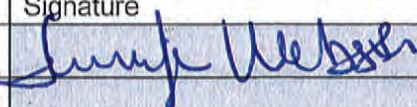
Per Diem rate per day (meals)	\$ 92.00
-------------------------------	----------

Cost Estimate Information**Personal Automobile Mileage Expenses**

Total miles		Multiply by the Mileage rate	\$0.70	\$ 0.00
Description	Rate	Factor	Days	Total
Per Diem for initial travel date	\$ 92.00	0.75	1	\$ 69.00
Per Diem full day at destination	\$ 92.00	1.00	2	\$ 184.00
Per Diem for return travel date	\$ 92.00	0.75	1	\$ 69.00
Included meals total				
Miscellaneous expenses: taxi, parking, fees, etc.				
Sub-Total = Travel Advance				\$ 322.00
Lodging including room, taxes, fees, and hotel parking	\$ 148.00		2	\$ 296.00
Airfare				\$ 1,063.00
Luggage Fees				\$ 60.00
Car Rental				\$ 0.00
Registration				\$ 0.00
Allowable price adjustment				\$ 500.00
Sub-Total = Virtual Card				\$ 1,919.00
Total Cost Estimate				\$ 2,241.00

I understand this advance will be deducted from my claim for reimbursement of actual travel expenses.
I also understand that if this advance is not cleared within 10 calendar days after my travel return date, the Nation has the authority to withhold any advanced funds from future wages.

Signatures / Approvals

	Signature	Date
Traveler		8-5-20
Department Sign-off		

Send all travel related items to: CentralAccounting_Travel@oneidanation.org

This serves as the **official notice of consultation** for the Administration for Children and Families' (ACF) Annual Tribal Consultation, which will be held on **August 25–26, 2026**.

The consultation will be held in a hybrid format, allowing Tribal leaders and their designees to participate either in person at the Mary E. Switzer Building, 330 C Street SW, Washington, DC, or virtually. Tribes are also invited to register for one-on-one meetings in conjunction with the consultation.

During the consultation, ACF leadership will engage with Tribal leaders to discuss issues important to Tribal Nations and ACF program priorities.

Agenda Planning

The final agenda for the ACF Tribal Consultation will be informed by Tribal input and ACF priorities. I invite you or your designee to participate in the planning call to identify topics for discussion during the consultation.

ACF Tribal Consultation Agenda Planning Call

Monday, July 27, 2026, at 3:00–4:00 p.m. EDT

ZoomGov Meeting Details

<https://acf-hhs-gov.zoomgov.com/j/1657227712?pwd=ICPX5vaGsYCbBmaTZz3HOTRUzbOGvy.1>

Meeting ID: 165 722 7712

Passcode: 715490

If you are unable to attend the planning call, you may submit topics for consideration during the registration process or by emailing Kim Kovel, Deputy Assistant Secretary for Tribal Affairs, ACF, and Principal Deputy Director, Administration for Native Americans (ANA), at tribalaffairs@acf.hhs.gov. Please include the subject line “ACF Tribal Consultation Planning Agenda” with your submission.

The final agenda may be revised based on feedback received during the planning call and through registration. The agenda will be distributed to registered participants via email prior to the consultation.

Potential discussion topics include:

- Reducing Administrative Burden and Deregulatory Opportunities
- A Home for Every Child — ACF's child welfare initiative announced in November 2025 to improve outcomes for children in foster care, strengthen foster home capacity nationwide, and support the U.S. Department of Health and Human Services' Making America Healthy Again (MAHA) priorities. Consultation discussions will focus on opportunities, challenges, and priorities affecting Native children, families, kinship caregivers, and Tribal child welfare systems.
- Public Law 102-477 Modernization — ACF's ongoing efforts to advance the modernization and transition of Public Law 102-477 implementation responsibilities. Discussions will explore opportunities to reduce administrative burden, improve service delivery, and strengthen Tribal self-determination through more coordinated program administration.

One-on-One Meetings with ACF Program Offices

The ACF Annual Tribal Consultation includes an opportunity for interested Tribes to meet one-on-one with ACF officials to discuss Tribal-specific priorities, program needs, and policy recommendations. These 30-minute sessions will provide dedicated time for engagement with ACF leadership and program staff.

Representatives from ACF program offices will be available to listen, answer questions, and contribute to the discussion. To request a one-on-one meeting, please indicate the ACF office or offices you would like to meet with during the registration process.

Please note that one-on-one meetings will be available in both in-person and virtual formats. Requests for one-on-one meetings must be received by 5:00 p.m. ET on August 12, 2026. Additional information regarding meeting schedules and logistics will be provided following registration.

Registration

Registration is required for all participants, regardless of whether they plan to attend in person or virtually.

Register here:

<https://app.smartsheetgov.com/b/form/2c4c1869c1044f058b7f31a120bee4c4>

For Tribes unable to attend in person, ACF will provide a virtual participation option. Tribal leaders or their designees may request an opportunity to speak and provide input and testimony virtually. Individuals participating virtually must register in advance to receive access information and be included in the meeting schedule.

If you need assistance with registration, please contact the ANA Help Desk at **1-833-262-4636 (833-ANA-INFO)**.

Written Comment Period

To further the meaningful impact of Tribal feedback on ACF programs, policies, and priorities, ACF will accept written comments for the consultation record. Tribes are encouraged to submit written comments by email to Alex Adams, Assistant Secretary, at tribalaffairs@acf.hhs.gov no later than September 25, 2026, at 5:00 p.m. ET.

Written comments received by the deadline will be included in the consultation record and considered as part of ACF's ongoing efforts to strengthen partnerships with Tribal Nations and improve programs and services affecting Tribal communities.

Please include the subject line "ACF Tribal Consultation Testimony" with your submission.

Should you have any questions regarding the consultation, please contact the ANA at tribalaffairs@acf.hhs.gov or **1-833-262-4636 (833-ANA-INFO)**.

I look forward to our continued partnership as we work together to build healthy, safe, and thriving Tribal communities.

Review the Oneida Minimum Internal Controls Chapter 8 Sports Wagering and determine next steps

Business Committee Agenda Request

1. Meeting Date Requested: 8/26/26

2. Session:

☐

Open

☐

Executive – must qualify under §107.4-1.

Justification: Choose or type justification

3. Requested Motion:

☒

Accept as information; OR

Enter the requested motion related to this item.

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☒

Gaming/Retail

☐

Boards, Committees, or Commissions

☐

Other:

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☐ Report |
| ☒ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☒ Other: Oneida Gaming Minimum Ir | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☐ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: Mark A. Powless Sr., OGC Chairman

Primary Requestor: Crystal Metoxen, Executive Assistant, OGC



Memorandum

TO: Oneida Business Committee

FROM: Mark A. Powless Sr., Chairman Oneida Gaming Commission 

DATE: August 13, 2026

RE: Oneida Gaming Minimum Internal Controls Chapter 8 Sports Wagering

Background

Oneida Gaming Minimum Internal Controls Chapter 8 Sports Wagering revised:

1. Oneida Gaming Minimum Internal Controls (OGMICS) Chapter 8 Sports Wagering was revised by the Oneida Gaming Commission on August 11, 2026. The Gaming Operation went live with Chapter 8 Sports Wagering on August 11, 2026.

The Oneida Gaming Commission has prepared this document to set forth the Nation's Tribal Minimum Internal Controls that will guide Gaming Operations and assist Internal Audit to ensure and maintain the integrity and security of Gaming Operations.

Action Requested:

Accept Oneida Gaming Minimum Internal Controls Chapter 8 Sports Wagering with requested revisions.

Please note (OBC Action Options) per the Chief Counsel memo dated February 27, 2019, regarding appropriate OBC action for OGMICS/ROP revisions, the motion for this request would be as follow: "Accept the notice of Oneida Gaming Minimum Internal Controls Chapter 8 Sports Wagering approved by the Oneida Gaming Commission on (August 11, 2026) and

- (a) Directs notice to the Gaming Commission there are requested revisions under Section 501.6-14(d)
- (b) Directs notice to the Gaming Commission that the Oneida Business Committee will be recommending amendments to Chapter 5 Gaming Machines in accordance with sections 510.-14(d)(3)(c); or
- (c) Directs notice to the Gaming Commission that the Oneida Business Committee repeals Chapter 5 Gaming Machines in accordance with section 501.6-14(d)(3)(A) and subsections (i).

Crystal V. Metoxen

From: Sarah D. Capelle
Sent: Tuesday, August 11, 2026 10:47 AM
To: Jodi M. Skenandore
Cc: Crystal V. Metoxen; GamingCommission_Compliance; Derrick R. King; Sarah D. Capelle
Subject: Notification: OGMICS Chapter 8 Sports Wagering
Attachments: OGMICS Chapter 8 Sports Wagering

DATE: 08/11/2026
FROM: Mark A. Powless Sr.
SUBJECT: OGMICS Chapter 8 Sports Wagering

The Gaming Commission has reviewed the following item(s) and is approved. This will be placed on the next Regular OGC Meeting agenda for retro approval.

1. OGMICS Chapter 8 Sports Wagering

If you have any further questions, please feel free to contact the OGC Chair Mark Powless Sr. via email mpowles5@oneidanation.org or at 497-5654.



A good mind. A good heart.
A strong Fire.

Sarah D. Capelle

Office Manager
Oneida Gaming Commission
Oneida Nation
☎ 920.496.5850 – OGC Main
OGC Fax: 920.469-2009
Backgrounds Fax: 920.490.8048

Chapter: 8**Sports****Wagering****Table of****Contents**

- (a) Definitions**
- (b) Events**
- (c) Event wagering system technical requirements**
- (d) Event wagering system periodic security testing**
- (e) Wagering station requirements**
- (f) Permitted locations, remote wagering device operation, security requirements, and geolocation requirements**
- (g) Issuance and control of wagering tickets**
- (h) Acceptance of wagers**
- (i) Payments of winning wagers**
- (j) Persons prohibited and/or limited from placing wagers**
- (k) Wagers or payouts in excess of \$3,000**
- (l) Reports of suspicious transactions**
- (m) Rules of play for event wagering**
- (n) House Rules for Event wagering**
- (o) Layoff wagers and gross revenue computations**
- (p) Wager record information**
- (q) Promotion/bonus information**
- (r) Transaction log or account statement**
- (s) Reporting requirements**
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- (u) Information technology requirements**
- (v) Surveillance requirements**
- (w) Wagering account requirements**
- (x) Reserve requirements for wagering accounts**

(a) Definitions. As used in this regulation:

- (1) “Account wager” means an event wager placed using a wagering account.
- (2) “Alteration” means the alteration of any accounting, reporting or significant event data.
- (3) “Amateur event” means an event in which participants are not permitted to receive

a salary, prize money, or other similar monetary compensation for their participation, except that they may be compensated in the form of: trophies or medals; waived entry fees for future sport or athletic events; scholarships and stipends for costs necessary to attend an academic institution; or compensation for the use of their names or likenesses where permitted by law, the National Collegiate Athletic Association, or any other appropriate governing body.

- (4) “Collegiate event” means an event in which the participants are students at a public or private institution that offers educational services beyond the secondary level.
- (5) “Contingency” means an event or market that is dependent upon the outcome of another event or market.
- (6) “Data-Based Verification Solution” means a proprietary verification algorithm provided by a third-party vendor mutually agreed upon by the State within a reasonable time-frame, that uses a combination of publicly available data sets that correlate first and last names, addresses, social security numbers, and phone numbers in conjunction with risk analysis to assign a verification score.
- (7) “Employee” means a person authorized by the Nation, Oneida Gaming Commission, or Tribal Gaming Management to make decisions or perform tasks on behalf of the Gaming Operation.
- (8) “Event” means an occurrence of sports, competitions, matches, and other types of activities on which wagers may be placed pursuant to these OGMICS.
- (9) “Event wagering” means the business of accepting wagers on events, but does not include pari-mutuel wagering.
- (10) “Event wagering system” means the hardware, software, firmware, communications technology, other equipment, and related operator procedures, used to enable customers to place wagers on events.
- (11) “Geolocation” means identifying the geographic location of an internet connected remote wagering device.
- (12) “GLI-33” means Gaming Laboratories International’s published standard titled “GLI- 33: Standards for Event Wagering Systems,” version: 1.1, revision date: May 14, 2019, and all subsequent revisions to that standard.
- (13) “Governing body” means an official body of managers which sanctions and

regulates an event (e.g., National Football League, National Collegiate Athletic Association, International Olympic Committee, analogous entities).

- (14) “High Confidence” means that the assigned verification score through a data-based verification solution or a knowledge-based authentication solution, as applicable, shall achieve at least eighty percent (80%) of the possible points awarded.
- (15) “House Rules for Event Wagering” means house rules that describe, for sporting events and other events for which wagers may be offered, the rules and regulations governing how those events are played or conducted.
- (16) “Knowledge-Based Authentication Solution” means a verification solution provided by a third-party vendor mutually agreed upon by the State within a reasonable time-frame, that uses a series of not less than five (5) questions generated from publicly available data sets to assign a verification score based on a customer’s responses.
- (17) “Layoff wager” means a wager placed either by Tribal Gaming Management with another casino, or by another Wisconsin casino with the Gaming Operation, for the purpose of offsetting patron wagers made pursuant to these regulations.
- (18) “Market” means a wager type (e.g., money line, spread, over/under) on which opportunities are built for wagering on one or more events.
- (19) “Messenger bettor” means a person who places an event wager for the benefit of another for compensation.
- (20) “OGMICS” means these Oneida Gaming Minimum Internal Control Standards.
- (21) “Nation” means the Oneida Nation of Wisconsin, its authorized officials, employees, agents, and representatives.
- (22) “Wisconsin OIGRC” means the State of Wisconsin’s Office of Indian Gaming and Regulatory Compliance or any successor Wisconsin regulatory authority.
- (23) “Olympic event” means an event played as part of the summer or winter Olympics.
- (24) “Payout” means the total payment due on a winning wager whether or not:

- (i) The customer collects the total payment due at onetime;
 - (ii) All or a portion of the payment due is made in the form of cash, chips, or other form of payment; or
 - (iii) All or a portion of the payment due is used by the customer to place another wager.
- (25) “Players Account” means an account that does not accept monetary deposits from a customer and is used solely for purposes of tracking reward or loyalty points, credits, or similar benefits issued by the gaming operation to a customer, even if such benefits are redeemable for cash.
- (26) “Professional event” means an event that is not an amateur event and which is regulated by an official governing body.
- (27) “Point-of-sale wagering station” means a desk or counter located in a building where Class III gaming is permitted and that is staffed by an employee for the purpose of accepting wagers.
- (28) “Remote wagering device” means a device operated using either an in-venue wireless network or the Internet that converts communications from the event wagering system into a human interpretable form and converts human decisions into a communication format understood by the event wagering system, and the use of which can be limited using geolocation. Examples of a remote wagering device include a personal computer, mobile phone, tablet, etc.
- (29) “Rules of Play for Event Wagering” means the rules governing the placing, acceptance, and payout of wagers on sporting events and other events, as described more fully in section (m) below.
- (30) “Self-service wagering kiosk” means a stationary electronic device located in a building where Class III gaming is permitted and that may be used by a customer to place a wager without the direct assistance of an employee, and if supported, may be used for redemption of winning wager records.
- (31) “Suspicious Transactions” has the meaning set forth in section (l) regarding reports of suspicious transactions.
- (32) “Valid Identification” is a REAL identification credential and/or government issued identification credential, which includes Oneida Nation Tribal

identification, provided that any such identification must contain the name, residential address, date of birth, photograph, and signature of the customer.

- (33) “Wagering account” means an electronic ledger administered by the Gaming Operation for use by, and that is accessible to, a customer for purposes of placing wagers and recording deposits and withdrawals of funds used for purposes of placing wagers.
- (34) “Wagering station” means a point-of-sale wagering station or a self-service wagering kiosk, at which or with which a customer can place a wager on a permitted event.

(b) Events.

- (1) Permitted Events. Except as otherwise set forth in this section, the Nation shall be permitted to offer wagers on the following types of events:
 - (i) Professional events and amateur events occurring outside of Wisconsin that do not involve Wisconsin teams;
 - (ii) Green Bay Packers games;
 - (iii) Milwaukee Brewers games;
 - (iv) Milwaukee Bucks games;
 - (v) Professional sports league drafts;
 - (vi) Olympic events;
 - (vii) Nationally-televised award shows;
 - (viii) Events deemed to be included within this section as permitted events pursuant to Sections XVIII(C), (E), or (G) of the Compact; and
 - (ix) Other events approved pursuant to the procedures set forth in this section.
- (2) The Nation shall not offer wagers on any events in which the majority of participants are under the age of 19.
- (3) The Nation shall not offer wagers on the outcome of elections for public office.
- (4) Approval of Other Events. In addition to the events identified in subsection

(1), the Nation shall be permitted to offer wagers on events that are approved by the State pursuant to the procedures set forth below and are approved by the Oneida Gaming Commission:

- (i) The Nation shall submit a written request to the Wisconsin Division of Gaming or its successor setting forth the event for which the Nation requests approval to offer wagering.
 - (ii) Within twenty-one (21) days of receiving the request, the State shall notify the Nation in writing whether it approves or objects to the request.
 - (iii) If the State approves the request, the Nation shall be permitted to offer wagering on the event and the State and the Nation shall promptly thereafter memorialize their agreement by amending subsection (1) to include the event.
 - (iv) For requested events occurring within Wisconsin or involving Wisconsin-based teams, that do not occur on land owned by the Nation or held in trust for the Nation by the federal government, the State may object to the request for any reason and the Nation shall not be permitted to offer wagering on the event. The State's decision shall not be subject to challenge through arbitration or otherwise.
 - (v) For requested events not occurring within Wisconsin and not involving Wisconsin-based teams, or events that occur on land owned by the Nation or held in trust for the Nation by the federal government, the State may object to wagering on the event only if the State presents evidence that there is a significant risk of improper manipulation of the event's outcome or activities within the event. All disputes regarding the State's objections that cannot be resolved informally shall be resolved through arbitration pursuant to Section XXIII(C) of the Compact. The issue for decision by the arbitration panel shall be whether the preponderance of the evidence supports the State's objection.
- (5) The Nation shall not offer wagering on events that are not permitted or approved pursuant to this section or deemed to be included within this section as permitted events pursuant to Sections XVIII(C), (E), or (G) of the Compact.
- (6) Prohibited Events. Wagers shall not be accepted for prohibited events. All events that are not permitted events are prohibited events.

(c) Event Wagering System Technical Requirements. Wagering on events shall only be conducted through the event wagering system. The event wagering system shall meet the following requirements:

- (1) Testing and Approval by an Independent Gaming Testing Lab. The event wagering system shall be tested and approved by an independent gaming testing lab that has been approved by Wisconsin OIGRC and which at a minimum complies with and tests to the standards from GLI-33: Standards for Event Wagering Systems sections 2.2.1.; 2.2.2.; 2.3.2.; and 2.3.3.
- (2) Revisions to GLI-33. Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.

(d) Event Wagering System Periodic Security Testing. Tribal Gaming Management shall verify that periodic security testing meeting the requirements of GLI-33, Appendix B.9 has been completed within a timeframe established by Tribal Gaming Management and approved by the Oneida Gaming Commission. Any revisions to Appendix B.9 will be treated as amendments to the OGMICS and will be subject to the provisions in Article XXXV of the Compact.

(e) Wagering station requirements

- (1) Independent Testing of Wagering Stations. All wagering stations shall meet the requirements of Gaming Laboratories International's standard titled GLI-20: Standards for Kiosks" (hereafter "GLI-20"). Revisions to GLI-20 shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.
- (2) Installation Testing. Upon installation and prior to placing each wagering station into service, each wagering station shall be tested to verify the proper functioning of at least the following:
 - (i) communication with the event wagering system;
 - (ii) communication with the player geolocation tracking system to the extent the station interfaces with the tracking system;
 - (iii) the wagering ticket printer;
 - (iv) all buttons and screens; and
 - (v) all software, which shall be verified by an independent test lab.
- (3) Software Validation. For wagering software installed locally on the wagering station, it shall be possible to authenticate that all critical components contained in the software are valid each time the software is loaded for use, and where supported by the system, on demand as may be required by the Oneida Gaming Commission. Critical components may include, but are not limited to, wagering rules, elements that

control the communications between the wagering station and the event system, or other components that are needed to ensure proper operation of the software. In the event of a failed authentication (i.e., program mismatch or authentication failure), the software shall prevent wagering operations and display an appropriate error message.

- (4) Removal, Retirement and/or Destruction. Procedures shall be implemented to ensure the proper retirement and removal of all wagering stations from operation.

(f) Permitted locations, remote wagering device operation, security requirements, and geolocation requirements.

- (1) A customer may place a wager using a remote wagering device only when the remote wagering device is located on a parcel of land that is within the boundaries of the Oneida Nation Reservation with the exception of parcels of land not owned by or held in trust for the Nation that contain a public or private school conducting classes in any of the grades pre-kindergarten through grade 12.
- (2) Wagering Account Requirement. Customers placing wagers from a remote wagering device must have a wagering account.
- (3) Secure and Confidential Communications. Communication between a remote wagering device and the event wagering system must be conducted using a method that securely links the remote wagering device to the event wagering system, maintains the confidentiality of the communications, and authenticates both the remote wagering device and the event wagering system as authorized to communicate over that link.
- (4) Authorization Information.
 - (i) The event wagering system shall require an account holder to re-enter his or her password/pin and/or biometric authentication after 15 minutes of inactivity, as measured by the event wagering system.
 - (ii) The event wagering system shall disable the account after three failed login attempts and require multi-factor authentication to recover or reset a password or username.
 - (iii) The remote wagering device software shall not be used to store passwords, pins, and/or biometric authorization information. Autocomplete, password caching, or other methods that will fill in the password field shall be disabled by default for the software.
- (5) Server Location. The server and other server-related equipment necessary to place, accept and payout a wager on an event shall be located within a secure facility owned by the Nation within the boundaries of the Nation's reservation.

- (6) Client-Server Interactions. The Event Wagering System shall comply with GLI-33: Standards for Event Wagering Systems sections 3.5.2(a)(b)(c), 3.5.3., 3.5.4., 3.5.5., and 3.5.6. Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.
- (7) Software Validation. For wagering software installed locally on the remote wagering device, it shall be possible to authenticate that all critical components contained in the software are valid each time the software is loaded for use, and where supported by the system, on demand as may be required by the Oneida Gaming Commission. Critical components may include, but are not limited to, wagering rules, elements that control the communications between the wagering station and the event system, or other components that are needed to ensure proper operation of the software. In the event of a failed authentication (i.e., program mismatch or authentication failure), the software shall prevent wagering operations and display an appropriate error message.
- (8) Compatibility Verification. During any installation or initialization and prior to commencing wagering operations, the event wagering system shall run a check to detect any incompatibilities or resource limitations with the remote wagering device that would prevent proper operation of the software (e.g., software version, minimum specifications not met, browser type, browser version, plug-in version, etc.). If any incompatibilities or resource limitations are detected, the software shall prevent wagering operations and display an appropriate error message.
- (9) Geolocation Requirements. Where remote wagering occurs over the internet, the event wagering system shall incorporate a location detection service or application to reasonably detect and dynamically monitor the location of a player attempting to place a wager, and to monitor and enable the blocking of unauthorized attempts to place a wager outside of the authorized wagering area.
- (i) Each player shall pass a location check prior to completing each wager after logging in on a specific Remote Wagering Device.
 - (A) If the location check indicates the player is outside the permitted boundary or cannot successfully locate the player, the wager shall be rejected, and the player shall be notified of this.
 - (B) An entry shall be recorded in a time stamped log any time a location violation is detected, including the unique player ID and the detected location.
 - (ii) In addition, the geolocation service shall comply with GLI-33: Standards for Event Wagering Systems sections 2.7.2., 2.7.3., 2.7.4.(b)(c)(d) and (e). Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV

of the Compact.

(g) Issuance and control of wagering tickets.

- (1) Immediately upon accepting a wager, other than an account wager, the event wagering system shall create and issue to the customer a wagering ticket containing at least the following written information:
 - (i) name of the event(s) or event market(s) wagered on;
 - (ii) amount(s) wagered;
 - (iii) terms of wager (type of bet and total take);
 - (iv) name, phone number, city and state of Tribal Gaming Management;
 - (v) a unique transaction identifier;
 - (vi) date and time the ticket was issued;
 - (vii) the cashier or kiosk generating the ticket; and
 - (viii) the redemption period for the ticket (which shall not be less than sixty (60) days after the occurrence of the event) and instructions for redemption by mail.
- (2) When accepting a wager through a wagering account, the event wagering system shall create and issue to the customer an e-wagering ticket containing at least the following written information:
 - (i) name of the event(s) or event market(s) wagered on;
 - (ii) amount(s) wagered;
 - (iii) terms of wager (type of bet and total take);
 - (iv) a unique transaction identifier; and
 - (v) date and time the ticket was issued.

(h) Acceptance of Wagers.

- (1) Wagers may only be made with cash, chips, or other representatives of value, or against credits made to a wagering account, consistent with Article V.D. of the Nation's compact with the State of Wisconsin.

- (2) Wagers shall not be knowingly accepted for an event or a market the outcome of which has already been determined.
- (3) Wagers shall not be accepted from a customer who Tribal Gaming Management or its employees know or reasonably should know is a messenger bettor.
- (4) Wagers shall not be accepted from a customer who Tribal Gaming Management or its employees know or reasonably should know is placing the wager in violation of tribal, state or federal law.
- (5) A customer's money or its equivalent shall not be held on the understanding that the money will be accepted as a wager only upon the occurrence of a specified, future contingency, unless a betting ticket documenting the wager and contingency is issued immediately when the operator receives the money or its equivalent.
- (6) Wagers shall not be accepted if the odds/lines are not posted. Odds/lines may be posted by electronic or manual means, including printed media. If posted odds/lines are not updated simultaneously with actual changes to the odds/lines, an announcement, audible throughout the operation, must be made simultaneously with the actual changes followed by updating the posted odds/lines within a time specified by Tribal Gaming Management.

(i) Payment of Winning Wagers.

- (1) Payment on a winning wager shall be made only to the person who presents the customer's copy of the betting ticket representing the wager.
- (2) Payment on a winning wager shall not be made to a person who Tribal Gaming Management or its employees know or reasonably should know is collecting the payment on behalf of another for monetary consideration or in violation of tribal, state, or federal law.
- (3) The gaming operation shall have controls in place detailing the method of paying winning tickets/vouchers in the event of a failure of the event wagering system's ability to pay winning tickets/vouchers.
- (4) Accounting records of all payments of winning wagers shall be retained by Tribal Gaming Management for a period of seven (7) years.
- (5) After the conclusion of the event all winning betting tickets shall be honored for the redemption period printed on the betting ticket, which shall be at least sixty (60) days from the date of the event.

(j) Persons Prohibited and/or Limited from Placing Wagers.

(1) Persons who have nonpublic information about an event or a participant in an event, who are in a position to affect the outcome of an event, or whose participation in wagering on an event might cause the appearance of a conflict of interest, shall be prohibited from wagering on the event or a market in the event. This includes but is not limited to the following types of persons:

- (i) athletes participating in the event; and
- (ii) employees or contractors of the governing body for the event, employees and contractors of the owner or management of a team participating in the event, and employees and contractors of athletes participating in the events, including but not limited to: referees, officials, coaches, managers, handlers, athletic trainers, team physicians, and other physicians providing medical consultation or treatment of an event participant.

(2) Tribal Gaming Management shall take reasonable steps to prevent the circumvention of this prohibition, which shall be satisfied by creating and following procedures to implement a blocked bettor list including all persons included in subsection (1), the names of whom may be provided by any athletic team or governing body involved in events for which Tribal Gaming Management accepts wagers. Tribal Gaming Management shall update the blocked bettor list within ten (10) days of receipt of new information from a team or governing body.

(3) Tribal Gaming Management may implement customer self-imposed and Tribal Gaming Management-imposed limits and exclusions.

(k) Wagers or Payouts in Excess of \$3,000. Aggregated wagers and payouts in the excess of \$3,000 require a verified and active Players Account. Valid Identification must be verified before any transactions exceeding \$3,000 can be processed.

(l) Reports of Suspicious Transactions.

(1) As used in this section, “suspicious transaction” means any transaction that Tribal Gaming Management or an agent knows or has reason to suspect:

- (i) is, or would be if completed, indicative of match fixing, the manipulation of an event, or misuse of inside information;
- (ii) is, or would be if completed, in violation of, or is part of a plan to violate or evade, any federal, state, or tribal law or regulation;
- (iii) is, or would be if completed, wagering by, or on behalf of, a person prohibited from placing wagers pursuant to section (j) of these OGMICS; or

- (iv) has no business or apparent lawful purpose or is not the sort of transaction the particular customer would normally be expected to perform, and the operator knows of no reasonable explanation for the transaction after examining the available facts, including the background of the transaction.

(2) Tribal Gaming Management:

- (i) shall file suspicious transaction reports to the Oneida Gaming Commission using a form developed by the Oneida Gaming Commission, disclosing all suspicious transactions which involve or aggregate to more than \$5,000 in funds or other assets; and
- (ii) may file a report of any suspicious transaction, regardless of the amount, if Tribal Gaming Management believes it is relevant to the possible violation of any law or regulation.

(3) Tribal Gaming Management shall immediately notify the Oneida Gaming Commission of any suspicious activity. In addition, Tribal Gaming Management shall timely file the report required in subsection (2) no later than seven (7) calendar days after the initial detection of the facts that may constitute a basis for filing such a report.

(4) The Oneida Gaming Commission shall promptly forward unredacted copies of all suspicious transaction reports to:

- (i) the tribal gaming regulatory authorities of other Wisconsin tribes where event wagering is offered; and
- (ii) the Wisconsin OIGRC.

(5) The Oneida Gaming Commission (OGC) or assigned designee shall forward all event wagering activity that meets the criteria of suspicious transactions to the appropriate governing bodies through an approved system specializing in sports-betting integrity.

(6) Tribal Gaming Management shall maintain a copy of any report filed and the original or business record equivalent of any supporting documentation for a period of seven (7) years from the date of filing the report. Supporting documentation shall be identified and maintained by Tribal Gaming Management as such and shall be deemed to have been filed with the report. Tribal Gaming Management shall make all supporting documentation available to the Oneida Gaming Commission, the Wisconsin OIGRC, and any other appropriate regulatory and law enforcement agencies upon request.

(7) Tribal Gaming Management and its agents shall not notify any person involved in the transaction that the transaction has been reported. Any report, whether written

or oral, does not impose liability for defamation or constitute a ground for recovery in any civil action.

- (8) Tribal Gaming Management may cancel or suspend wagering on events as set out in the Rules of Play for Event Wagering and House Rules for Event Wagering.

(m) Rules of Play for Event Wagering. Comprehensive rules of play governing event wagering transactions with customers shall be conspicuously displayed at all gaming operations. All rules of play must be approved by the Oneida Gaming Commission and submitted to Wisconsin OIGRC in accordance with the Oneida Nation's Gaming Compact Article XXXV.A. prior to implementation. The rules must specify the following at a minimum:

- (1) the types of wagers offered, including payout information;
- (2) rules governing acceptance of wagers, which shall include any restrictive provisions such as minimum and maximum wager amounts to be paid on winning wagers;
- (3) effect of schedule or event location changes;
- (4) when the event result is considered official for purposes of a wager;
- (5) redemption period for winning tickets;
- (6) the method of noticing odds or line changes to customers;
- (7) procedures for handling incorrectly posted events, odds, wagers, or results;
- (8) the policy regarding cancellation of wagers, including whether cancellations by the customer are permitted;
- (9) that wagers may be accepted at other than the currently posted terms, if applicable; and
- (10) identification requirements for customers placing wagers.

Notwithstanding anything in these OGMICS to the contrary, comprehensive rules of play governing event wagering transactions with customers need not be separately displayed at a gaming operation if the information specified in this section (m) is contained within House Rules for Event Wagering that are conspicuously displayed in accordance with section (n).

(n) House Rules for Event Wagering. The House Rules for Event Wagering shall be conspicuously displayed at all gaming operations. All House Rules must be approved by

the Oneida Gaming Commission.

(o) Layoff Wagers and Gross Revenue Computations. Tribal Gaming Management, in its discretion, may accept layoff wagers only from other Wisconsin tribal casinos. Layoff wagers placed by Tribal Gaming Management may be made in any jurisdiction where such placement is permitted provided that Tribal Gaming Management shall comply with any regulations related to layoff wagers in the jurisdiction where said wager is placed. Layoff wagers shall not affect the computation of the Nation's net win. Should Tribal Gaming Management place a layoff wager with any other Wisconsin tribal casino, it shall disclose its identity to the tribe accepting the wager.

(p) Wager Record Information. For each individual wager placed by a customer, the information to be maintained and backed up by the system shall include:

- (1) The date and time the wager was placed;
- (2) any customer choices involved in the wager:
 - (i) market and line postings (e.g., money line bet, point spreads, over/under amounts, win/place/show);
 - (ii) wager selection (e.g., athlete or team name and number);
 - (iii) any special condition(s) applying to the wager;
- (3) results of the wager (blank until confirmed);
- (4) total amount wagered, including any promotional/bonus credits (if applicable);
- (5) total amount won, including any promotional/bonus credits (if applicable);
- (6) commission or fees collected (if applicable);
- (7) date and time the winning wager was paid to the player;
- (8) unique identification number of the wager;
- (9) user identification or unique wagering device ID which issued the wager record (if applicable);
- (10) relevant location information;
- (11) event and market identifiers;
- (12) current wager status (active, cancelled, unredeemed, pending, void, invalid, redemption in progress, redeemed, etc.);
- (13) unique player ID, for wagers conducted using a wagering account; and
- (14) redemption period (if applicable).

(q) Promotion/Bonus Information. The Event Wagering System shall comply with OGMICS Chapter 6, Gaming Promotions and Player Tracking.

(r) Transaction log or account statement. The system must be able to provide wagering account holders with an electronic record history of all transactions upon request. The information provided shall include sufficient information to allow the customer to reconcile the statement or log against their own financial records. Information to be provided shall include at a minimum, details on the following types of transactions:

(1) financial transactions (time stamped with a unique transaction ID):

- (i) deposits to the customer's wagering account;
- (ii) withdrawals from the customer's wagering account;
- (iii) promotional or bonus credits added to/removed from the customer's wagering account (outside of credits won in wagering); and
- (iv) manual adjustments or modifications to the customer's wagering account (e.g., due to refunds).

(2) wagering transactions:

- (i) unique identification number of the wager;
- (ii) date and time the wager was placed;
- (iii) date and time the event started and ended or is expected to occur for future events (if known);
- (iv) date and time the results were confirmed (blank until confirmed);
- (v) any customer choices involved in the wager, including market and line postings, wager selection, and any special condition(s) applying to the wager;
- (vi) results of the wager (blank until confirmed);
- (vii) total amount wagered, including any promotional/bonus credits (if applicable);
- (viii) total amount won, including any promotional/bonus credits (if applicable);
- (ix) commission or fees collected (if applicable); and
- (x) the date and time the winning wager was paid to the player.

(s) Reporting Requirements. The event wagering system shall be able to generate the following types of reports:

(1) Operator Revenue Report. An operator revenue report must contain, at a minimum, the following information for each event as a whole and for each individual market

within that event:

- (i) the date and time each event started and ended;
 - (ii) total amount of wagers collected;
 - (iii) total amount of winnings paid to customers;
 - (iv) total amount of wagers cancelled;
 - (v) commission and fees collected (if applicable);
 - (vi) event and market identifiers; and
 - (vii) event status (in progress, complete, confirmed, etc.).
- (2) Operator Liability Report. An operator liability report must contain, at a minimum, the following information:
- (i) total amount held by the gaming operation for customer accounts (if applicable);
 - (ii) total amount of wagers placed on future events; and
 - (iii) total amount of winnings owed but unpaid by the operator on winning wagers.
- (3) Promotion/Bonus Summary Report. A promotion/bonus summary report shall provide information regarding the amounts of any promotions and/or bonuses provided to customers that are redeemable for cash, wagering credits, or merchandise, and shall contain, at a minimum, the following information:
- (i) beginning balance for all promotions/bonuses;
 - (ii) total amount of all promotions/bonuses issued;
 - (iii) total amount of all promotions/bonuses redeemed;
 - (iv) total amount of all promotions/bonuses expired;
 - (v) total amount of all promotion/bonus adjustments; and
 - (vi) ending balance for promotion/bonus.
- (4) Future Events Report. A future events report must contain, at a minimum, the following information for the gaming day:
- (i) wagers placed prior to the gaming day for future events (total and by wager);

- (ii) wagers placed on the gaming day for future events (total and by wager);
- (iii) wagers placed prior to the gaming day for events occurring on that gaming day (total and by wager);
- (iv) wagers placed on the gaming day for events occurring on that gaming day (total and by wager);
- (v) wagers cancelled on the gaming day (total and by wager); and
- (vi) event and market identifiers.

(5) Significant Events and Alterations Report.

- (i) A significant events and alterations report must contain, at a minimum, the following information:
 - (A) date and time of each significant event or alteration;
 - (B) event/market identifier, if applicable;
 - (C) identification of user(s) who performed and/or authorized each alteration;
 - (D) reason/description of the significant event or alteration, including any data or parameters altered;
 - (E) data or parameter value prior to alteration; and
 - (F) data or parameter value after alteration.
- (ii) A “significant event” includes the following:
 - (A) a failed login attempt;
 - (B) a program error or authentication mismatch;
 - (C) significant periods of unavailability of any critical component of the event wagering system;
 - (D) large wins (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including wager record information;
 - (E) large wagers (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including wager

- record information;
 - (F) system voids, overrides, and corrections;
 - (G) changes to live data files occurring outside of normal program and operating system execution;
 - (H) changes that are made to the download data library, including the addition, changing or deletion of software, where supported;
 - (I) changes to operating system, database, network, and application policies and parameters;
 - (J) changes to date/time on master time server;
 - (K) changes to previously established criteria for an event or market (not including line posting changes for active markets);
 - (L) changes to the results of an event or market;
 - (M) changes to promotion and/or bonus parameters;
 - (N) the following player account management information:
 - 1. adjustments to a player account balance;
 - 2. changes made to player data and sensitive information recorded in a player account;
 - 3. deactivation of a player account; and
 - 4. large financial transactions (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including transaction information;
 - (O) irrecoverable loss of sensitive information;
 - (P) any other activity requiring user intervention and occurring outside of the normal scope of system operation; and
 - (Q) other significant or unusual events as deemed applicable by the Oneida Gaming Commission.
- (6) User Access Listing Report. A user access listing report is a list identifying all users and user access to the event wagering system. The report must contain, at a minimum, the following:

- (i) employee name and title or position;

- (ii) user login name;
- (iii) date and time of each login;
- (iv) date of last password change; and
- (v) date and time account disabled/deactivated.

(7) Title 31 Reporting. Tribal Gaming Management shall comply with OGMICS, Chapter 17, Currency Transaction Reporting (Title 31).

(t) Risk Management. Tribal Gaming Management may engage the services of a state licensed sports book services provider for the purpose of advising about the management of risk associated with event wagering, including but not limited to:

- (1) management of risks associated with wagering on any event or market within an event;
- (2) determination of where lines, point spreads, odds, or other activities relating to wagering are initially set and the determination of whether to change such lines, point spreads, odds, or other activities;
- (3) whether or not to accept or reject wagers or to place layoff wagers; and
- (4) the use, transmittal, and accumulation of information and data for the purpose of providing risk management.

(u) Information Technology Requirements. OGMICS Chapter 11, Information Technology and Information Technology Data shall apply to the event wagering system.

(v) Surveillance Requirements. Tribal Gaming Management shall maintain surveillance coverage of the areas in which event wagering may take place within the gaming facility. This surveillance shall be part of the gaming facility's surveillance system and subject to the same monitoring, activity reporting, maintenance and recording retention requirements as the rest of the system. Tribal Gaming Management shall ensure that the event wagering surveillance meets the following additional requirements:

- (1) For live cashier stations, the system must provide coverage of the defined wagering areas with sufficient detail to identify individuals within the cage and customers and staff members at the counter areas and to confirm the amount of each transaction;
- (2) For wagering kiosks, the system must provide dedicated camera coverage of the individual placing the wager with sufficient clarity to identify that individual.

(w) Wagering Account Requirements. Customers must have a wagering account prior to placing a wager on a remote wagering device. The following are requirements related to wagering accounts.

- (1) A wagering account must be capable of recording at least the following types of transactions:
 - (i) deposits;
 - (ii) withdrawals/redemption;
 - (iii) debits;
 - (iv) credits;
 - (v) service or other transaction-related charges authorized by the customer; and
 - (vi) adjustments to the wagering account.
- (2) Wagering accounts may only be established for individual persons and no entity may establish an account, except for other Wisconsin Tribal casinos offering sports wagering and solely for the purpose of making layoff wagers.
- (3) Only customers of the legal age to wager may open a wagering account;
- (4) Prior to establishing a wagering account in person at one of the Nation's Gaming Operations, Tribal Gaming Management shall:
 - (i) verify the customer's identity, including age, using a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer; and
 - (ii) verify that the customer is not on the Gaming Operation's blocked bettor list or other exclusion lists.
- (5) Prior to establishing a wagering account on a Remote Wagering Device:
 - (i) Tribal Gaming Management shall:
 - (A) verify the customer's identity using a Data-Based Verification Solution at a High Confidence; and
 - (B) verify that the device identification and phone number provided at the time of the wagering account registration both match the customer's publicly known data.

- (ii) If Tribal Gaming Management cannot meet both verification requirements in (i), Tribal Gaming Management shall verify the customer's identity using either:
 - (A) a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer and a photograph taken by the customer on the device at the time of the wagering account registration, as compared to the photograph provided on the customer's REAL identification credential and/or government issued identification credential; or
 - (B) a Knowledge-Based Authentication Solution at a High Confidence.
 - (iii) If Tribal Gaming Management cannot meet the verification requirements based on the method initially selected from (ii) above, Tribal Gaming Management shall verify the customer's identity using the other method described in (ii) above.
 - (iv) If Tribal Gaming Management cannot meet the verification requirements described in (i) and subsequently cannot meet the verification requirements described in (ii), the customer shall open an account in person at one of the Nation's Gaming Operations.
 - (v) Tribal Gaming Management verify that the customer is not on any of the Gaming Operation's blocked bettor list or other exclusion lists.
- (6) Establishment of a wagering account must require the customer to consent to the monitoring and recording of the use of the wagering account, including geographic location information, by Tribal Gaming Management for the purposes of monitoring and investigating suspicious wagering activity and enforcing geographic restrictions on the use of remote wagering devices.
- (7) A customer may have no more than one wagering account and only the account holder may place wagers through the account. If an individual other than the account holder places a wager through the wagering account, Tribal Gaming Management shall suspend the wagering account and place both the account holder and individual who placed the wager through the account on the Nation's List of Excluded Persons, as described in Article V.G. of the Nation's Gaming Compact.
- (8) Any person who intentionally circumvents the geographic restrictions on placing wagers set forth in these OGMICs shall be permanently barred from wagering.
- (9) Tribal Gaming Management must have a documented method to address potential

customer account fraud, which, at a minimum, shall require Tribal Gaming Management to suspend the wagering account of any individual involved in the fraudulent placement of wager(s).

- (10) After establishment of the account or any modification of the wagering account password, PIN or other security feature where applicable, Tribal Gaming Management shall provide notice of any such action to the account holder via electronic or regular mail, text message, or equivalent mechanism.
- (11) A wagering account shall not be activated for use until all account holder identification information has been collected.
- (12) All account holder identification information must be stored in a secure electronic wagering account file.
- (13) The operator shall encrypt, at a minimum, the following wagering account information:
 - (i) the account holder's social security number or equivalent for a foreign customer such as a passport or tax identification number;
 - (ii) the account holder's username, passwords, and/or PINs; and
 - (iii) credit card numbers, bank account numbers, or other financial information.
- (14) The wagering account system shall have a method for securely issuing, modifying, and resetting an account holder's password, personal identification number (PIN), or other security feature where applicable, which shall include, at a minimum, proof of identity, if in person, or multi-factor identification.
- (15) An account holder's event wagering account may be funded with the following:
 - (i) The account holder's deposit of cash, gaming chips, or slot voucher at a cashiering location;
 - (ii) Cash complimentaries, promotional credits, or bonus credits;
 - (iii) Winnings;
 - (iv) ACH or debit transfer from an account of the wagering account holder, provided that the Nation has security measures and controls to prevent fraud; and
 - (v) Adjustments made by Tribal Gaming Management with documented notification to the account holder. All adjustments shall be authorized by supervisory personnel prior to being entered.

- (16) Withdrawals from a wagering account may be made only by the account holder. Withdrawals may be made for the purpose of:
- (i) The funding of wagers;
 - (ii) A cash-out at the cashier's cage;
 - (iii) A cash-out transfer directly to the account holder's individual account with a bank or other financial institution (banking account). Tribal Gaming Management shall verify the validity of the banking account with the financial institution prior to making any transfers; and
 - (iv) Adjustments made by Tribal Gaming Management with documented notification to the account holder. Adjustments shall be authorized by supervisory personnel prior to being entered.

(x) Reserve Requirements for Wagering Accounts.

- (1) Tribal Gaming Management shall maintain a reserve in the form of cash, cash equivalents, an irrevocable letter of credit, a bond, or a combination thereof for the benefit and protection of customer funds held in wagering accounts.
- (2) The amount of the reserve shall not be less than the greater of \$25,000 or the sum of the following amounts:
 - (i) Amounts held by the book for the account of customers;
 - (ii) Amounts accepted by the book as wagers for events or markets that have not yet occurred; and
 - (iii) Amounts owed but unpaid on winning wagers through the period established for honoring winning wagers.
- (3) Reserve requirements must be calculated each day. If reserve is not sufficient to cover the calculated requirement, Tribal Gaming Management must notify the Oneida Gaming Commission and the Wisconsin OIGRC in writing and must also state the steps that will be taken to promptly remedy the deficiency.

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(a) Definitions. As used in this regulation:

- (1) “Account wager” means an event wager placed using a wagering account.
- (2) “Alteration” means the alteration of any accounting, reporting or significant event data.
- (3) “Amateur event” means an event in which participants are not permitted to receive

a salary, prize money, or other similar monetary compensation for their participation, except that they may be compensated in the form of: trophies or medals; waived entry fees for future sport or athletic events; scholarships and stipends for costs necessary to attend an academic institution; or compensation for the use of their names or likenesses where permitted by law, the National Collegiate Athletic Association, or any other appropriate governing body.

- (4) “Collegiate event” means an event in which the participants are students at a public or private institution that offers educational services beyond the secondary level.
- (5) “Contingency” means an event or market that is dependent upon the outcome of another event or market.

(6) “Data-Based Verification Solution” means a proprietary verification algorithm provided by a third-party vendor mutually agreed upon by the Wisconsin OIGRC (State) within a reasonable time-frame, that uses a combination of publicly available data sets that correlate first and last names, addresses, social security numbers, and phone numbers in conjunction with risk analysis to assign a verification score.

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(7) “Employee” means a person authorized by the Nation, Oneida Gaming Commission, or Tribal Gaming Management to make decisions or perform tasks on behalf of the Gaming Operation.

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(8) “Event” means an occurrence of sports, competitions, matches, and other types of activities on which wagers may be placed pursuant to these OGMICS.

(9) “Event wagering” means the business of accepting wagers on events, but does not include pari-mutuel wagering.

(10) “Event wagering system” means the hardware, software, firmware, communications technology, other equipment, and related operator procedures, used to enable customers to place wagers on events.

(11) “Geolocation” means identifying the geographic location of an internet connected remote wagering device.

(12) “GLI-33” means Gaming Laboratories International’s published standard titled “GLI- 33: Standards for Event Wagering Systems,” version: 1.1, revision date: May 14, 2019, and all subsequent revisions to that standard.

~~(12)~~(13) “Governing body” means an official body of managers which sanctions and regulates an event (e.g., National Football League, National Collegiate Athletic Association, International Olympic Committee, analogous entities).

~~(14)~~ “High Confidence” means that the assigned verification score through a data-based verification solution or a knowledge-based authentication solution, as applicable, shall achieve at least eighty percent (80%) of the possible points awarded.

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~~(13)~~(15) “House Rules for Event Wagering” means house rules that describe, for sporting events and other events for which wagers may be offered, the rules and regulations governing how those events are played or conducted.

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~~(16)~~ “Knowledge-Based Authentication Solution” means a verification solution provided by a third-party vendor mutually agreed upon by the Wisconsin OIGRC (State) within a reasonable time-frame, that uses a series of not less than five (5) questions generated from publicly available data sets to assign a verification score based on a customer’s responses.

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~~(14)~~(17) “Layoff wager” means a wager placed either by Tribal Gaming Management with another casino, or by another Wisconsin casino with the Gaming Operation, for the purpose of offsetting patron wagers made pursuant to these regulations.

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~~(15)~~(18) “Market” means a wager type (e.g., money line, spread, over/under) on which opportunities are built for wagering on one or more events.

~~(16)~~(19) “Messenger bettor” means a person who places an event wager for the benefit of another for compensation.

~~(17)~~(20) “OGMICS” means these Oneida Gaming Minimum Internal Control Standards.

~~(18)~~(21) “Nation” means the Oneida Nation of Wisconsin, its authorized officials, employees, agents, and representatives.

~~(19)~~(22) “Wisconsin OIGRC” means the State of Wisconsin’s Office of Indian Gaming and Regulatory Compliance or any successor Wisconsin regulatory authority.

~~(20)~~(23) “Olympic event” means an event played as part of the summer or winter Olympics.

~~(21)~~(24) “Payout” means the total payment due on a winning wager whether or not:

- (i) The customer collects the total payment due at onetime;
- (ii) All or a portion of the payment due is made in the form of cash, chips, or other form of payment; or
- (iii) All or a portion of the payment due is used by the customer to place another wager.

~~(22)~~(25) “Players Account” means an account that does not accept monetary deposits from a customer and is used solely for purposes of tracking reward or loyalty points, credits, or similar benefits issued by the gaming operation to a customer, even if such benefits are redeemable for cash.

~~(23)~~(26) “Professional event” means an event that is not an amateur event and which is regulated by an official governing body.

~~(24)~~(27) “Point-of-sale wagering station” means a desk or counter located in a building where Class III gaming is permitted and that is staffed by an employee for the purpose of accepting wagers.

~~(25)~~(28) “Remote wagering device” means a device operated using either an in-venue wireless network or the Internet that converts communications from the event wagering system into a human interpretable form and converts human decisions into a communication format understood by the event wagering system, and the use of which can be limited using geolocation. Examples of a remote wagering device include a personal computer, mobile phone, tablet, etc.

~~(26)~~(29) “Rules of Play for Event Wagering” means the rules governing the placing, acceptance, and payout of wagers on sporting events and other events, as described more fully in section (m) below.

~~(27)~~(30) “Self-service wagering kiosk” means a stationary electronic device located in a building where Class III gaming is permitted and that may be used by a customer to place a wager without the direct assistance of an employee, and if supported, may be used for redemption of winning wager records.

~~(28)~~(31) “Suspicious Transactions” has the meaning set forth in section (l) regarding reports of suspicious transactions.

~~(29)~~(32) “Valid Identification” is a REAL identification credential and/or government issued identification credential, which includes Oneida Nation Tribal identification, provided that any such identification must contain the name, residential address, date of birth, photograph, and signature of the customer.

~~(30)~~(33) “Wagering account” means an electronic ledger administered by the Gaming Operation for use by, and that is accessible to, a customer for purposes of placing wagers and recording deposits and withdrawals of funds used for purposes of placing wagers.

~~(31)~~(34) “Wagering station” means a point-of-sale wagering station or a self-service wagering kiosk, at which or with which a customer can place a wager on a permitted event.

(b) Events.

- (1) Permitted Events. Except as otherwise set forth in this section, the Nation shall be permitted to offer wagers on the following types of events:
 - (i) Professional events and amateur events occurring outside of Wisconsin that do not involve Wisconsin teams;
 - (ii) Green Bay Packers games;
 - (iii) Milwaukee Brewers games;
 - (iv) Milwaukee Bucks games;
 - (v) Professional sports league drafts;
 - (vi) Olympic events;
 - (vii) Nationally-televised award shows;
 - (viii) Events deemed to be included within this section as permitted events pursuant to Sections XVIII(C), (E), or (G) of the Compact; and
 - (ix) Other events approved pursuant to the procedures set forth in this section.
- (2) The Nation shall not offer wagers on any events in which the majority of participants are under the age of 19.

- (3) The Nation shall not offer wagers on the outcome of elections for public office.
- (4) Approval of Other Events. In addition to the events identified in subsection (1), the Nation shall be permitted to offer wagers on events that are approved by the State pursuant to the procedures set forth below and are approved by the Oneida Gaming Commission:
- (i) The Nation shall submit a written request to the Wisconsin Division of Gaming or its successor setting forth the event for which the Nation requests approval to offer wagering.
 - (ii) Within twenty-one (21) days of receiving the request, the State shall notify the Nation in writing whether it approves or objects to the request.
 - (iii) If the State approves the request, the Nation shall be permitted to offer wagering on the event and the State and the Nation shall promptly thereafter memorialize their agreement by amending subsection (1) to include the event.
 - (iv) For requested events occurring within Wisconsin or involving Wisconsin-based teams, that do not occur on land owned by the Nation or held in trust for the Nation by the federal government, the State may object to the request for any reason and the Nation shall not be permitted to offer wagering on the event. The State's decision shall not be subject to challenge through arbitration or otherwise.
 - (v) For requested events not occurring within Wisconsin and not involving Wisconsin-based teams, or events that occur on land owned by the Nation or held in trust for the Nation by the federal government, the State may object to wagering on the event only if the State presents evidence that there is a significant risk of improper manipulation of the event's outcome or activities within the event. All disputes regarding the State's objections that cannot be resolved informally shall be resolved through arbitration pursuant to Section XXIII(C) of the Compact. The issue for decision by the arbitration panel shall be whether the preponderance of the evidence supports the State's objection.
- (5) The Nation shall not offer wagering on events that are not permitted or approved pursuant to this section or deemed to be included within this section as permitted events pursuant to Sections XVIII(C), (E), or (G) of the Compact.
- (6) Prohibited Events. Wagers shall not be accepted for prohibited events. All events that are not permitted events are prohibited events.

(c) Event Wagering System Technical Requirements. Wagering on events shall only be conducted through the event wagering system. The event wagering system shall meet the following requirements:

- (1) Testing and Approval by an Independent Gaming Testing Lab. The event wagering system shall be tested and approved by an independent gaming testing lab that has been approved by Wisconsin OIGRC and which at a minimum complies with and tests to the standards from GLI-33: Standards for Event Wagering Systems sections 2.2.1.; 2.2.2.; 2.3.2.; and 2.3.3.
- (2) Revisions to GLI-33. Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.

(d) Event Wagering System Periodic Security Testing. Tribal Gaming Management shall verify that periodic security testing meeting the requirements of GLI-33, Appendix B.9 an Independent Gaming Testing Lab has been completed within a timeframe established by Tribal Gaming Management and approved by the Oneida Gaming Commission. Any revisions to Appendix B.9 will be treated as amendments to the OGMICS and will be subject to the provisions in Article XXXV of the Compact.

Commented [AB1]: To retain the GLI-33 standards as a requirement.

Commented [AB2]: For consistency with other references.

(e) Wagering station requirements

- (1) Independent Testing of Wagering Stations. All wagering stations shall meet the requirements of Gaming Laboratories International's standard titled GLI-20: Standards for Kiosks" (hereafter "GLI-20"). Revisions to GLI-20 shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.
- (2) Installation Testing. Upon installation and prior to placing each wagering station into service, each wagering station shall be tested to verify the proper functioning of at least the following:
 - (i) communication with the event wagering system;
 - (ii) communication with the player geolocation tracking system to the extent the station interfaces with the tracking system;
 - (iii) the wagering ticket printer;
 - (iv) all buttons and screens; and
 - (v) all software, which shall be verified by an independent test lab.

(3) Software Validation. For wagering software installed locally on the wagering station,

it shall be possible to authenticate that all critical components contained in the software are valid each time the software is loaded for use, and where supported by the system, on demand as may be required by the Oneida Gaming Commission. Critical components may include, but are not limited to, wagering rules, elements that control the communications between the wagering station and the event system, or other components that are needed to ensure proper operation of the software. In the event of a failed authentication (i.e., program mismatch or authentication failure), the software shall prevent wagering operations and display an appropriate error message.

- (4) Removal, Retirement and/or Destruction. Procedures shall be implemented to ensure the proper retirement and removal of all wagering stations from operation.

(f) Permitted locations, remote wagering device operation, security requirements, and geolocation requirements.

- (1) A customer may place a wager using a remote wagering device only when the remote wagering device is located on a parcel of land that is within the boundaries of the Oneida Nation Reservation with the exception of parcels of land not owned by or held in trust for the Nation that contain a public or private school conducting classes in any of the grades pre-kindergarten through grade 12.
- (2) Wagering Account Requirement. Customers placing wagers from a remote wagering device must have a wagering account.
- (3) Secure and Confidential Communications. Communication between a remote wagering device and the event wagering system must be conducted using a method that securely links the remote wagering device to the event wagering system, maintains the confidentiality of the communications, and authenticates both the remote wagering device and the event wagering system as authorized to communicate over that link.
- (4) Authorization Information.
 - (i) The event wagering system shall require an account holder to re-enter his or her password/pin and/or biometric authentication after 15 minutes of inactivity, as measured by the event wagering system.
 - (ii) The event wagering system shall disable the account after three failed login attempts and require multi-factor authentication to recover or reset a password or username.
 - (iii) The remote wagering device software shall not be used to store passwords, pins, and/or biometric authorization information. Autocomplete, password caching, or other methods that will fill in the password field shall be disabled by default for the software.

- (5) Server Location. The server and other server-related equipment necessary to place, accept and payout a wager on an event shall be located within a secure facility owned by the Nation within the boundaries of the Nation's reservation.
- (6) Client-Server Interactions. The Event Wagering System shall comply with GLI-33: Standards for Event Wagering Systems sections 3.5.2(a)(b)(c), 3.5.3., 3.5.4., 3.5.5., and 3.5.6. Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.
- (7) Software Validation. For wagering software installed locally on the remote wagering device, it shall be possible to authenticate that all critical components contained in the software are valid each time the software is loaded for use, and where supported by the system, on demand as may be required by the Oneida Gaming Commission. Critical components may include, but are not limited to, wagering rules, elements that control the communications between the wagering station and the event system, or other components that are needed to ensure proper operation of the software. In the event of a failed authentication (i.e., program mismatch or authentication failure), the software shall prevent wagering operations and display an appropriate error message.
- (8) Compatibility Verification. During any installation or initialization and prior to commencing wagering operations, the event wagering system shall run a check to detect any incompatibilities or resource limitations with the remote wagering device that would prevent proper operation of the software (e.g., software version, minimum specifications not met, browser type, browser version, plug-in version, etc.). If any incompatibilities or resource limitations are detected, the software shall prevent wagering operations and display an appropriate error message.
- (9) Geolocation Requirements. Where remote wagering occurs over the internet, the event wagering system shall incorporate a location detection service or application to reasonably detect and dynamically monitor the location of a player attempting to place a wager, and to monitor and enable the blocking of unauthorized attempts to place a wager outside of the authorized wagering area.
 - (i) Each player shall pass a location check prior to completing each wager after logging in on a specific Remote Wagering Device.
 - (A) If the location check indicates the player is outside the permitted boundary or cannot successfully locate the player, the wager shall be rejected, and the player shall be notified of this.
 - (B) An entry shall be recorded in a time stamped log any time a location violation is detected, including the unique player ID and the detected location.

- (ii) In addition, the geolocation service shall comply with GLI-33: Standards for Event Wagering Systems sections 2.7.2., 2.7.3., 2.7.4.(b)(c)(d) and (e). Revisions to GLI-33 sections referenced herein shall be treated as an amendment to these OGMICS and shall be made subject to the provisions in Article XXXV of the Compact.

(g) Issuance and control of wagering tickets.

- (1) Immediately upon accepting a wager, other than an account wager, the event wagering system shall create and issue to the customer a wagering ticket containing at least the following written information:
 - (i) name of the event(s) or event market(s) wagered on;
 - (ii) amount(s) wagered;
 - (iii) terms of wager (type of bet and total take);
 - (iv) name, phone number, city and state of Tribal Gaming Management;
 - (v) a unique transaction identifier;
 - (vi) date and time the ticket was issued;
 - (vii) the cashier or kiosk generating the ticket; and
 - (viii) the redemption period for the ticket (which shall not be less than sixty (60) days after the occurrence of the event) and instructions for redemption by mail.
- (2) When accepting a wager through a wagering account, the event wagering system shall create and issue to the customer an e-wagering ticket containing at least the following written information:
 - (i) name of the event(s) or event market(s) wagered on;
 - (ii) amount(s) wagered;
 - (iii) terms of wager (type of bet and total take);
 - (iv) a unique transaction identifier; and
 - (v) date and time the ticket was issued.

(h) Acceptance of Wagers.

- (1) Wagers may only be made with cash, chips, or other representatives of value, or against credits made to a wagering account, consistent with Article V.D. of the Nation's compact with the State of Wisconsin.
- (2) Wagers shall not be knowingly accepted for an event or a market the outcome of which has already been determined.
- (3) Wagers shall not be accepted from a customer who Tribal Gaming Management or its employees know or reasonably should know is a messenger bettor.
- (4) Wagers shall not be accepted from a customer who Tribal Gaming Management or its employees know or reasonably should know is placing the wager in violation of tribal, state or federal law.
- (5) A customer's money or its equivalent shall not be held on the understanding that the money will be accepted as a wager only upon the occurrence of a specified, future contingency, unless a betting ticket documenting the wager and contingency is issued immediately when the operator receives the money or its equivalent.
- (6) Wagers shall not be accepted if the odds/lines are not posted. Odds/lines may be posted by electronic or manual means, including printed media. If posted odds/lines are not updated simultaneously with actual changes to the odds/lines, an announcement, audible throughout the operation, must be made simultaneously with the actual changes followed by updating the posted odds/lines within a time specified by Tribal Gaming Management.

(i) Payment of Winning Wagers.

- (1) Payment on a winning wager shall be made only to the person who presents the customer's copy of the betting ticket representing the wager.
- (2) Payment on a winning wager shall not be made to a person who Tribal Gaming Management or its employees know or reasonably should know is collecting the payment on behalf of another for monetary consideration or in violation of tribal, state, or federal law.
- (3) The gaming operation shall have controls in place detailing the method of paying winning tickets/vouchers in the event of a failure of the event wagering system's ability to pay winning tickets/vouchers.
- (4) Accounting records of all payments of winning wagers shall be retained by Tribal Gaming Management for a period of seven (7) years.
- (5) After the conclusion of the event all winning betting tickets shall be honored for

the redemption period printed on the betting ticket, which shall be at least sixty (60) days from the date of the event.

(j) Persons Prohibited and/or Limited from Placing Wagers.

- (1) Persons who have nonpublic information about an event or a participant in an event, who are in a position to affect the outcome of an event, or whose participation in wagering on an event might cause the appearance of a conflict of interest, shall be prohibited from wagering on the event or a market in the event. This includes but is not limited to the following types of persons:

- (i) athletes participating in the event; and
- (ii) employees or contractors of the governing body for the event, employees and contractors of the owner or management of a team participating in the event, and employees and contractors of athletes participating in the events, including but not limited to: referees, officials, coaches, managers, handlers, athletic trainers, team physicians, and other physicians providing medical consultation or treatment of an event participant.

- (2) Tribal Gaming Management shall take reasonable steps to prevent the circumvention of this prohibition, which shall be satisfied by creating and following procedures to implement a blocked bettor list including all persons included in subsection (1), the names of whom may be provided by any athletic team or governing body involved in events for which Tribal Gaming Management accepts wagers. Tribal Gaming Management shall update the blocked bettor list within ten (10) days of receipt of new information from a team or governing body.

- (3) Tribal Gaming Management may implement customer self-imposed and Tribal Gaming Management-imposed limits and exclusions.

(k) Wagers or Payouts in Excess of \$3,000. Aggregated wagers and payouts in the excess of \$3,000 require a verified and active Players Account. Valid Identification must be verified before any transactions exceeding \$3,000 can be processed.

(l) Reports of Suspicious Transactions.

- (1) As used in this section, “suspicious transaction” means any transaction that Tribal Gaming Management or an agent knows or has reason to suspect:
- (i) is, or would be if completed, indicative of match fixing, the manipulation of an event, or misuse of inside information;
 - (ii) is, or would be if completed, in violation of, or is part of a plan to violate or evade, any federal, state, or tribal law or regulation;

- (iii) is, or would be if completed, wagering by, or on behalf of, a person prohibited from placing wagers pursuant to section (j) of these OGMICS; or
- (iv) has no business or apparent lawful purpose or is not the sort of transaction the particular customer would normally be expected to perform, and the operator knows of no reasonable explanation for the transaction after examining the available facts, including the background of the transaction.

(2) Tribal Gaming Management:

- (i) shall file suspicious transaction reports to the Oneida Gaming Commission using a form developed by the Oneida Gaming Commission, disclosing all suspicious transactions which involve or aggregate to more than \$5,000 in funds or other assets; and
- (ii) may file a report of any suspicious transaction, regardless of the amount, if Tribal Gaming Management believes it is relevant to the possible violation of any law or regulation.

(3) Tribal Gaming Management shall immediately notify the Oneida Gaming Commission of any suspicious activity. In addition, Tribal Gaming Management shall timely file the report required in subsection (2) no later than seven (7) calendar days after the initial detection of the facts that may constitute a basis for filing such a report.

(4) The Oneida Gaming Commission shall promptly forward unredacted copies of all suspicious transaction reports to:

- (i) the tribal gaming regulatory authorities of other Wisconsin tribes where event wagering is offered; and
- (ii) the Wisconsin OIGRC.

(5) The Oneida Gaming Commission (OGC) **or assigned designee** shall forward all ~~suspicious sporting event event~~ **wagering activity transaction reports that meets the criteria of suspicious transactions** to the ~~appropriate event~~ **governing bodies through an approved system specializing in sports-betting integrity**.

(6) Tribal Gaming Management shall maintain a copy of any report filed and the original or business record equivalent of any supporting documentation for a period of seven (7) years from the date of filing the report. Supporting documentation shall be identified and maintained by Tribal Gaming Management as such and shall be deemed to have been filed with the report. Tribal Gaming Management shall make all supporting documentation available to the Oneida Gaming Commission, the

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Commented [JS3]: (5) (approved language now)

The Oneida Gaming Commission shall forward redacted copies of all suspicious transaction reports to the applicable event governing bodies, provided that the governing body has provided Tribal Gaming Management with the appropriate contact information.

New language

The Oneida Gaming Commission (OGC), or its assigned designee, shall forward all suspicious sporting event wagering activity to the appropriate governing bodies through an approved system specializing sports-betting integrity system.

Wisconsin OIGRC, and any other appropriate regulatory and law enforcement agencies upon request.

- (7) Tribal Gaming Management and its agents shall not notify any person involved in the transaction that the transaction has been reported. Any report, whether written or oral, does not impose liability for defamation or constitute a ground for recovery in any civil action.
- (8) Tribal Gaming Management may cancel or suspend wagering on events as set out in the Rules of Play for Event Wagering and House Rules for Event Wagering.

(m) Rules of Play for Event Wagering. Comprehensive rules of play governing event wagering transactions with customers shall be conspicuously displayed at all gaming operations. All rules of play must be approved by the Oneida Gaming Commission and submitted to Wisconsin OIGRC in accordance with the Oneida Nation's Gaming Compact Article XXXV.A. prior to implementation. The rules must specify the following at a minimum:

- (1) the types of wagers offered, including payout information;
- (2) rules governing acceptance of wagers, which shall include any restrictive provisions such as minimum and maximum wager amounts to be paid on winning wagers;
- (3) effect of schedule or event location changes;
- (4) when the event result is considered official for purposes of a wager;
- (5) redemption period for winning tickets;
- (6) the method of noticing odds or line changes to customers;
- (7) procedures for handling incorrectly posted events, odds, wagers, or results;
- (8) the policy regarding cancellation of wagers, including whether cancellations by the customer are permitted;
- (9) that wagers may be accepted at other than the currently posted terms, if applicable; and
- (10) identification requirements for customers placing wagers.

Notwithstanding anything in these OGMICS to the contrary, comprehensive rules of play governing event wagering transactions with customers need not be separately displayed

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at a gaming operation if the information specified in this section (m) is contained within House Rules for Event Wagering that are conspicuously displayed in accordance with section (n).

Commented [JS4]: Added and agreed upon by state, OGC , Gaming management

(n) House Rules for Event Wagering. The House Rules for Event Wagering shall be conspicuously displayed at all gaming operations. All House Rules must be approved by the Oneida Gaming Commission.

(o) Layoff Wagers and Gross Revenue Computations. Tribal Gaming Management, in its discretion, may accept layoff wagers only from other Wisconsin tribal casinos. Layoff wagers placed by Tribal Gaming Management may be made in any jurisdiction where such placement is permitted provided that Tribal Gaming Management shall comply with any regulations related to layoff wagers in the jurisdiction where said wager is placed. Layoff wagers shall not affect the computation of the Nation's net win. Should Tribal Gaming Management place a layoff wager with any other Wisconsin tribal casino, it shall disclose its identity to the tribe accepting the wager.

(p) Wager Record Information. For each individual wager placed by a customer, the information to be maintained and backed up by the system shall include:

- (1) The date and time the wager was placed;
- (2) any customer choices involved in the wager:
 - (i) market and line postings (e.g., money line bet, point spreads, over/under amounts, win/place/show);
 - (ii) wager selection (e.g., athlete or team name and number);
 - (iii) any special condition(s) applying to the wager;
- (3) results of the wager (blank until confirmed);
- (4) total amount wagered, including any promotional/bonus credits (if applicable);
- (5) total amount won, including any promotional/bonus credits (if applicable);
- (6) commission or fees collected (if applicable);
- (7) date and time the winning wager was paid to the player;
- (8) unique identification number of the wager;
- (9) user identification or unique wagering device ID which issued the wager record (if applicable);
- (10) relevant location information;
- (11) event and market identifiers;

- (12) current wager status (active, cancelled, unredeemed, pending, void, invalid, redemption in progress, redeemed, etc.);
- (13) unique player ID, for wagers conducted using a wagering account; and
- (14) redemption period (if applicable).

(q) Promotion/Bonus Information. The Event Wagering System shall comply with OGMICS Chapter 6, Gaming Promotions and Player Tracking.

(r) Transaction log or account statement. The system must be able to provide wagering account holders with an electronic record history of all transactions upon request. The information provided shall include sufficient information to allow the customer to reconcile the statement or log against their own financial records. Information to be provided shall include at a minimum, details on the following types of transactions:

(1) financial transactions (time stamped with a unique transaction ID):

- (i) deposits to the customer's wagering account;
- (ii) withdrawals from the customer's wagering account;
- (iii) promotional or bonus credits added to/removed from the customer's wagering account (outside of credits won in wagering); and
- (iv) manual adjustments or modifications to the customer's wagering account (e.g., due to refunds).

(2) wagering transactions:

- (i) unique identification number of the wager;
- (ii) date and time the wager was placed;
- (iii) date and time the event started and ended or is expected to occur for future events (if known);
- (iv) date and time the results were confirmed (blank until confirmed);
- (v) any customer choices involved in the wager, including market and line postings, wager selection, and any special condition(s) applying to the wager;
- (vi) results of the wager (blank until confirmed);
- (vii) total amount wagered, including any promotional/bonus credits (if applicable);
- (viii) total amount won, including any promotional/bonus credits (if applicable);
- (ix) commission or fees collected (if applicable); and

(x) the date and time the winning wager was paid to the player.

(s) Reporting Requirements. The event wagering system shall be able to generate the following types of reports:

(1) Operator Revenue Report. An operator revenue report must contain, at a minimum, the following information for each event as a whole and for each individual market within that event:

- (i) the date and time each event started and ended;
- (ii) total amount of wagers collected;
- (iii) total amount of winnings paid to customers;
- (iv) total amount of wagers cancelled;
- (v) commission and fees collected (if applicable);
- (vi) event and market identifiers; and
- (vii) event status (in progress, complete, confirmed, etc.).

(2) Operator Liability Report. An operator liability report must contain, at a minimum, the following information:

- (i) total amount held by the gaming operation for customer accounts (if applicable);
- (ii) total amount of wagers placed on future events; and
- (iii) total amount of winnings owed but unpaid by the operator on winning wagers.

(3) Promotion/Bonus Summary Report. A promotion/bonus summary report shall provide information regarding the amounts of any promotions and/or bonuses provided to customers that are redeemable for cash, wagering credits, or merchandise, and shall contain, at a minimum, the following information:

- (i) beginning balance for all promotions/bonuses;
- (ii) total amount of all promotions/bonuses issued;
- (iii) total amount of all promotions/bonuses redeemed;
- (iv) total amount of all promotions/bonuses expired;
- (v) total amount of all promotion/bonus adjustments; and

- (vi) ending balance for promotion/bonus.
- (4) Future Events Report. A future events report must contain, at a minimum, the following information for the gaming day:
 - (i) wagers placed prior to the gaming day for future events (total and by wager);
 - (ii) wagers placed on the gaming day for future events (total and by wager);
 - (iii) wagers placed prior to the gaming day for events occurring on that gaming day (total and by wager);
 - (iv) wagers placed on the gaming day for events occurring on that gaming day (total and by wager);
 - (v) wagers cancelled on the gaming day (total and by wager); and
 - (vi) event and market identifiers.
- (5) Significant Events and Alterations Report.
 - (i) A significant events and alterations report must contain, at a minimum, the following information:
 - (A) date and time of each significant event or alteration;
 - (B) event/market identifier, if applicable;
 - (C) identification of user(s) who performed and/or authorized each alteration;
 - (D) reason/description of the significant event or alteration, including any data or parameters altered;
 - (E) data or parameter value prior to alteration; and
 - (F) data or parameter value after alteration.
 - (ii) A “significant event” includes the following:
 - (A) a failed login attempt;
 - (B) a program error or authentication mismatch;
 - (C) significant periods of unavailability of any critical component of the event wagering system;

- (D) large wins (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including wager record information;
- (E) large wagers (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including wager record information;
- (F) system voids, overrides, and corrections;
- (G) changes to live data files occurring outside of normal program and operating system execution;
- (H) changes that are made to the download data library, including the addition, changing or deletion of software, where supported;
- (I) changes to operating system, database, network, and application policies and parameters;
- (J) changes to date/time on master time server;
- (K) changes to previously established criteria for an event or market (not including line posting changes for active markets);
- (L) changes to the results of an event or market;
- (M) changes to promotion and/or bonus parameters;
- (N) the following player account management information:
 - 1. adjustments to a player account balance;
 - 2. changes made to player data and sensitive information recorded in a player account;
 - 3. deactivation of a player account; and
 - 4. large financial transactions (single and aggregate over defined time period) in excess of a value specified by the Oneida Gaming Commission, including transaction information;
- (O) irrecoverable loss of sensitive information;
- (P) any other activity requiring user intervention and occurring outside of the normal scope of system operation; and
- (Q) other significant or unusual events as deemed applicable by the

Oneida Gaming Commission.

(6) User Access Listing Report. A user access listing report is a list identifying all users and user access to the event wagering system. The report must contain, at a minimum, the following:

- (i) employee name and title or position;
- (ii) user login name;
- (iii) date and time of each login;
- (iv) date of last password change; and
- (v) date and time account disabled/deactivated.

(7) Title 31 Reporting. Tribal Gaming Management shall comply with OGMICS, Chapter 17, Currency Transaction Reporting (Title 31).

(t) Risk Management. Tribal Gaming Management may engage the services of a state licensed sports book services provider for the purpose of advising about the management of risk associated with event wagering, including but not limited to:

- (1) management of risks associated with wagering on any event or market within an event;
- (2) determination of where lines, point spreads, odds, or other activities relating to wagering are initially set and the determination of whether to change such lines, point spreads, odds, or other activities;
- (3) whether or not to accept or reject wagers or to place layoff wagers; and
- (4) the use, transmittal, and accumulation of information and data for the purpose of providing risk management.

(u) Information Technology Requirements. OGMICS Chapter 11, Information Technology and Information Technology Data shall apply to the event wagering system.

(v) Surveillance Requirements. Tribal Gaming Management shall maintain surveillance coverage of the areas in which event wagering may take place within the gaming facility. This surveillance shall be part of the gaming facility's surveillance system and subject to the same monitoring, activity reporting, maintenance and recording retention requirements as the rest of the system. Tribal Gaming Management shall ensure that the event wagering surveillance meets the following additional requirements:

- (1) For live cashier stations, the system must provide coverage of the defined wagering

areas with sufficient detail to identify individuals within the cage and customers and staff members at the counter areas and to confirm the amount of each transaction;

- (2) For wagering kiosks, the system must provide dedicated camera coverage of the individual placing the wager with sufficient clarity to identify that individual.

(w) Wagering Account Requirements. Customers must have a wagering account prior to placing a wager on a remote wagering device. The following are requirements related to wagering accounts.

- (1) A wagering account must be capable of recording at least the following types of transactions:
 - (i) deposits;
 - (ii) withdrawals/redemption;
 - (iii) debits;
 - (iv) credits;
 - (v) service or other transaction-related charges authorized by the customer; and
 - (vi) adjustments to the wagering account.
- (2) Wagering accounts may only be established for individual persons and no entity may establish an account, except for other Wisconsin Tribal casinos offering sports wagering and solely for the purpose of making layoff wagers.
- (3) Only customers of the legal age to wager may open a wagering account;
- (4) Prior to establishing a wagering account in person at one of the Nation's Gaming Operations, Tribal Gaming Management shall:
 - (i) verify the customer's identity, including age, using a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer; and
 - (ii) verify that the customer is not on the Gaming Operation's blocked bettor list or other exclusion lists.

(3) Only customers of the legal age to wager may open a wagering account;

(4) Prior to establishing a wagering account in person at one of the Nation's Gaming Operations, Tribal Gaming Management shall:

- (i) verify the customer's identity, including age, using a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer; and
- (ii) verify that the customer is not on the Gaming Operation's blocked bettor list or other exclusion lists.

~~(4)(5) Prior to establishing a wagering account on a Remote Wagering Device, Tribal Gaming Management shall verify:~~

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Commented [JS5]: Removed and agreed by State, OGC and Gaming Management.
(2) Customer registration for a wagering account must occur on-site at a licensed gaming facility.

Commented [JS6R5]: Removed (4) Prior to establishing a wagering account, Tribal Gaming Management shall verify:
(i) the customer's identity, including age, using:
(A) third party or governmental databases; and
(B) a Valid Identification.
(ii) that the customer is not on any of the gaming operation's exclusion lists.

State suggested and replaced with

1) Prior to establishing a wagering account in person at one of the Nation's Gaming Operations, Tribal Gaming Management shall:

i) verify the customer's identity, including age, using a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer; and

(ii) verify that the customer is not on the Gaming Operation's blocked bettor list or other exclusion lists.

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Commented [JS7]: 1) Prior to establishing a wagering account on a Remote Wagering Device, Tribal Gaming Management shall verify:
Everything in 5 is the States suggestions.

- (i) Tribal Gaming Management shall:
- (A) verify the customer's identity using a Data-Based Verification Solution at a High Confidence; and
- (B) verify that the device identification and phone number provided at the time of the wagering account registration both match the customer's publicly known data.
- (ii) If Tribal Gaming Management cannot meet both verification requirements in (i), Tribal Gaming Management shall verify the customer's identity using either:
- (A) a REAL identification credential and/or government issued identification credential, which includes tribal identification, provided that any such identification shall contain the name, residential address (if applicable), date of birth, photograph, and signature of the customer and a photograph taken by the customer on the device at the time of the wagering account registration, as compared to the photograph provided on the customer's REAL identification credential and/or government issued identification credential; or
- (B) a Knowledge-Based Authentication Solution at a High Confidence.
- (iii) If Tribal Gaming Management cannot meet the verification requirements based on the method initially selected from (ii) above, Tribal Gaming Management shall verify the customer's identity using the other method described in (ii) above.
- (iv) If Tribal Gaming Management cannot meet the verification requirements described in (i) and subsequently cannot meet the verification requirements described in (ii), the customer shall open an account in person at one of the Nation's Gaming Operations.
- (i) the customer's identity, including age, using:
- (A) third party or governmental databases; and
- (ii) (v) Tribal Gaming Management verify that the customer is not on any of the Gaming Operation's blocked bettor list or other exclusion listexclusion lists.
- (vi) The Oneida Gaming Commission and the Wisconsin OIGRC agree that [vendor solution] presumably meets the High Confidence standard for a Data-

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Commented [AB8]: State can agree to removing ID verification for registration of wagering account on an electronic device, but only with enhanced know-your-customer verification standards, including:

Commented [RN9R8]: Gaming Management would like

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~~Based Verification Solution. The Oneida Gaming Commission and the Wisconsin OIGRC must mutually agree that any other third-party vendor's Data-Based Verification Solution shall be at least as robust as the [vendor solution] Data-Based Verification Solution to meet the High Confidence definition.~~

~~(vii) The Oneida Gaming Commission and the Wisconsin OIGRC agree that [vendor solution] presumably meets the High Confidence standard for a Knowledge-Based Authentication Solution. The Oneida Gaming Commission and the Wisconsin OIGRC must mutually agree that any other third-party vendor's Knowledge-Based Authentication Solution shall be at least as robust as the [vendor solution] Knowledge-Based Authentication Solution to meet the High Confidence definition.~~

Commented [JS10]: Request to remove w)(5)(vi) & (w)(5)(vii) – Suggesting deletion as these are duplicates already covered under (w)(5)(i)(A) & (w)(5)(ii)(B)

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~~(5)(6)~~ Establishment of a wagering account must require the customer to consent to the monitoring and recording of the use of the wagering account, including geographic location information, by Tribal Gaming Management for the purposes of monitoring and investigating suspicious wagering activity and enforcing geographic restrictions on the use of remote wagering devices.

~~(6)(7)~~ A customer may have no more than one wagering account and only the account holder may place wagers through the account. If an individual other than the account holder places a wager through the wagering account, Tribal Gaming Management shall suspend the wagering account and place both the account holder and individual who placed the wager through the account on the Nation's List of Excluded Persons, as described in Article V.G. of the Nation's Gaming Compact.

~~(7)(8)~~ Any person who intentionally circumvents the geographic restrictions on placing wagers set forth in these OGMICs shall be permanently barred from wagering.

~~(8)(9)~~ Tribal Gaming Management must have a documented method to address potential customer account fraud, which, at a minimum, shall require Tribal Gaming Management to suspend the wagering account of any individual involved in the fraudulent placement of wager(s).

~~(9)(10)~~ After establishment of the account or any modification of the wagering account password, PIN or other security feature where applicable, Tribal Gaming Management shall provide notice of any such action to the account holder via electronic or regular mail, text message, or equivalent mechanism.

~~(10)(11)~~ A wagering account shall not be activated for use until all account holder identification information has been collected.

~~(11)(12)~~ All account holder identification information must be stored in a secure electronic wagering account file.

~~(12)~~(13) The operator shall encrypt, at a minimum, the following wagering account information:

- (i) the account holder's social security number or equivalent for a foreign customer such as a passport or tax identification number;
- (ii) the account holder's username, passwords, and/or PINs; and
- (iii) credit card numbers, bank account numbers, or other financial information.

~~(13)~~(14) The wagering account system shall have a method for securely issuing, modifying, and resetting an account holder's password, personal identification number (PIN), or other security feature where applicable, which shall include, at a minimum, proof of identity, if in person, or multi-factor identification.

~~(14)~~(15) An account holder's event wagering account may be funded with the following:

- (i) The account holder's deposit of cash, gaming chips, or slot ~~tokens~~ voucher at a cashiering location;
- (ii) Cash complimentaries, promotional credits, or bonus credits;
- (iii) Winnings;
- (iv) ACH or debit transfer from an account of the wagering account holder, provided that the Nation has security measures and controls to prevent ~~ACH~~ fraud; and
- (v) Adjustments made by Tribal Gaming Management with documented notification to the account holder. All adjustments shall be authorized by supervisory personnel prior to being entered.

~~(15)~~(16) Withdrawals from a wagering account may be made only by the account holder. Withdrawals may be made for the purpose of:

- (i) The funding of wagers;
- (ii) A cash-out at the cashier's cage;
- (iii) A cash-out transfer directly to the account holder's individual account with a bank or other financial institution (banking account). Tribal Gaming Management shall verify the validity of the banking account with the financial institution prior to making any transfers; and

- (iv) Adjustments made by Tribal Gaming Management with documented notification to the account holder. Adjustments shall be authorized by supervisory personnel prior to being entered.

(x) Reserve Requirements for Wagering Accounts.

- (1) Tribal Gaming Management shall maintain a reserve in the form of cash, cash equivalents, an irrevocable letter of credit, a bond, or a combination thereof for the benefit and protection of customer funds held in wagering accounts.
- (2) The amount of the reserve shall not be less than the greater of \$25,000 or the sum of the following amounts:
 - (i) Amounts held by the book for the account of customers;
 - (ii) Amounts accepted by the book as wagers for events or markets that have not yet occurred; and
 - (iii) Amounts owed but unpaid on winning wagers through the period established for honoring winning wagers.
- (3) Reserve requirements must be calculated each day. If reserve is not sufficient to cover the calculated requirement, Tribal Gaming Management must notify the Oneida Gaming Commission and the Wisconsin OIGRC in writing and must also state the steps that will be taken to promptly remedy the deficiency.

Accept the 2026 General Election final report and declare the official results

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. General Information:

Session: ☒ Open ☐ Executive – must qualify under §107.4-1.
Justification: DRAFT materials/discussion

3. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

4. Budget Information:

- | | | |
|--|--|-------------------------------------|
| ☐ Budgeted | ☐ Budgeted – Grant Funded | ☐ Unbudgeted |
| ☒ Not Applicable | ☐ Other: <i>Describe</i> | |

5. Submission:

Authorized Sponsor: Tina Skenandore, Vice Chair/Oneida Election Board

Primary Requestor: Shannon Davis, Recording Clerk

Additional Requestor: (Name, Title/Entity)

Additional Requestor: (Name, Title/Entity)

Submitted By: SDAVIS



ONEIDA NATION 2026 GENERAL ELECTION FINAL REPORT

Tina Skenandore, Election Board Vice Chairperson
Approved by Election Board on 08/10/2026

2026 GENERAL ELECTION FINAL REPORT

The Election Board held the tri-annual General Election for vacancies within: Oneida Business Committee, Oneida Election Board, Oneida Land Claims Commission, Oneida Lan Commission, Oneida Nation Commission on Aging, Oneida Nation School Board (Parent/Guardian & Community-at-Large), Oneida Trust Enrollments, Oneida Personnel Commission, and Oneida Judiciary (Court of Appeals Chief Judge & Judge, Trial Court Chief Judge & Judge) for positions.

The General Election was held on Saturday, July 11, 2026, from 7 a.m-7 p.m. at the Oneida Community Health Center and in Milwaukee at the SEOTS building.

Included in the report are: 1) Narrative; 2) Totals and Demographic Breakdowns 3) Final Election Results; 4) Total Election Costs; 5) Issues of Grave Concern for Business Committee to Address; and 6) Requested Action.

1. NARRATIVE

The General Election was held on Saturday, July 11, 2026, in accordance with all applicable laws (Examples: Oneida Election Law and Oneida Judiciary Law.) Amendments were made to the Election Law due to reduce the number of Oneida Election Board member required to sign the election totals of machine counted ballots from six (6) to three (3) members [1.O.C 102.10-2].

The following individuals were present at the polls for the special election in their official capacity as required by the Oneida Election Law:

Oneida Polling Site:

Tina Skenanodre, Vice Chair
Lynette Jordan, Secretary
Pat Moore, Member
Leslie Doxtater, Alternate
Faith Huff, Alternate
Justine Huff, Alternate
Lisa John, Alternate
Mary King, Alternate
Jackie Webster, Alternate
Jean Webster, Alternate
Kelly Danforth, Trust Enrollments
Yasiman Metoxen, Trust Enrollments
Sacheen Lawrence, Trust Enrollments
Connie Skenandore, Trust Enrollments
Justine Wheelock, OPD
Alexis Woefel, OPD

Milwaukee Polling Site:

Rosa Laster, Alternate
Linda Langen, Alternate
Ramona Salinas, Alternate
Michelle John, Trust Enrollments
Amber Martinez, Trust Enrollments
Eddie Metoxen, OPD

2. TOTALS AND DEMOGRAPHIC INFORMATION

General Election Totals: 1,689

<u>Age Groups</u>	<u>On Reservation</u>		<u>Brown Outagamie Counties</u>		<u>Milwaukee Area</u>		<u>Madison Area</u>		<u>State of Wisconsin</u>		<u>Out of State or Location Unknown</u>		<u>Total</u>
	F	M	F	M	F	M	F	M	F	M	F	M	
18-20	7	11	6	1	0	2	0	0	0	0	0	0	27
21-54	315	204	85	75	25	15	3	3	11	12	14	11	773
55-61	104	62	24	13	8	7	1	1	8	2	4	3	237
62-64	51	24	11	8	3	2	0	0	4	3	1	2	109
65-69	84	48	20	16	10	5	0	0	8	1	0	1	193
70-74	66	38	15	11	11	1	0	0	4	2	1	1	150
75-79	47	27	10	5	13	2	1	0	1	1	1	0	108
80-84	30	15	4	3	2	0	0	0	2	0	2	0	58
85-89	15	6	3	0	0	1	0	0	0	0	1	0	26
90-94	5	2	0	0	1	0	0	0	0	0	0	0	8
95+	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	724	437	178	132	73	35	5	4	38	21	24	18	1689

Number of voters: 1,689 (Oneida total: 1,161, Brown & Outagamie County total: 310, Milwaukee total: 108, Madison total: 9, State of WI total: 59, Out of State or Unknown total: 42)
 Number of spoiled ballots: insert # (Milwaukee - 0; Oneida 36)

**This section must be included in the Final Report in accordance with the Election Law*

3. FINAL 2026 GENERAL ELECTION RESULTS

Winners are highlighted

	<u>Oneida</u>	<u>Milwaukee</u>	<u>Total</u>
<u>Oneida Business Committee - Chair</u>			
Tehassi Hill	<u>1,020</u>	<u>92</u>	<u>1,112</u>
Sherry Kriescher	<u>466</u>	<u>55</u>	<u>521</u>
<u>Oneida Business Committee - Vice Chair</u>			
Jameson Wilson	<u>1,127</u>	<u>85</u>	<u>1,212</u>
Fred Muscavitch	<u>363</u>	<u>57</u>	<u>420</u>
<u>Oneida Business Committee - Treasurer</u>			
Larry Barton	<u>889</u>	<u>87</u>	<u>976</u>
Louise Cornelius	<u>613</u>	<u>57</u>	<u>670</u>
<u>Oneida Business Committee - Secretary</u>			
Lisa Liggins	<u>861</u>	<u>89</u>	<u>950</u>
Gina Powless-Buenrostro	<u>613</u>	<u>50</u>	<u>663</u>

	<u>Oneida</u>	<u>Milwaukee</u>	<u>Total</u>
<u>Oneida Business Committee - Council Member</u>			
Kristal Hill	<u>529</u>	<u>46</u>	<u>575</u>
Jermaine Delgado	<u>362</u>	<u>41</u>	<u>403</u>
Jennifer (Jenny) Webster	<u>748</u>	<u>58</u>	<u>806</u>
David "Fleet" Jordan	<u>357</u>	<u>37</u>	<u>394</u>
Levi King	<u>316</u>	<u>26</u>	<u>342</u>
Lora Danforth	<u>616</u>	<u>46</u>	<u>662</u>
Maureen Perkins	<u>314</u>	<u>21</u>	<u>335</u>
Jennifer Hill Kelley	<u>522</u>	<u>37</u>	<u>559</u>
Jonas Hill	<u>551</u>	<u>60</u>	<u>611</u>
Shannon Hill	<u>248</u>	<u>25</u>	<u>273</u>
Teresa J. Schuman	<u>323</u>	<u>24</u>	<u>347</u>
Pamela Ninham	<u>244</u>	<u>54</u>	<u>298</u>
Daniel Webster	<u>318</u>	<u>45</u>	<u>363</u>
Aliskwet Ellis	<u>834</u>	<u>54</u>	<u>888</u>
Linda "Buffy" Dallas	<u>344</u>	<u>44</u>	<u>388</u>
<u>Oneida Election Board</u>			
Cheryl Powless	<u>487</u>	<u>46</u>	<u>533</u>
Cheryle Schommer	<u>290</u>	<u>14</u>	<u>304</u>
Cheryl (Metoxen) Stevens	<u>810</u>	<u>67</u>	<u>877</u>
Vicki Cornelius	<u>773</u>	<u>78</u>	<u>851</u>
Stephanie Metoxen	<u>538</u>	<u>49</u>	<u>587</u>
Carmen Escamea	<u>341</u>	<u>32</u>	<u>373</u>
Cathy L. Metoxen	<u>287</u>	<u>65</u>	<u>352</u>
<u>Oneida Land Claims Commission</u>			
Candace Jourdan	<u>835</u>	<u>84</u>	<u>919</u>
Denice E. Beans	<u>762</u>	<u>68</u>	<u>830</u>
Kerry Kennedy	<u>402</u>	<u>49</u>	<u>451</u>
<u>Oneida Land Commission</u>			
Donald (Donnie) Webster	<u>260</u>	<u>24</u>	<u>284</u>
Sherrole Benton	<u>347</u>	<u>40</u>	<u>387</u>
David A. Webster	<u>247</u>	<u>33</u>	<u>280</u>
Rod Hill	<u>610</u>	<u>36</u>	<u>646</u>
Nick Webster	<u>185</u>	<u>19</u>	<u>204</u>
Carmen Escamea	<u>178</u>	<u>17</u>	<u>195</u>
Patricia A. Cornelius	<u>638</u>	<u>60</u>	<u>698</u>

	<u>Oneida</u>	<u>Milwaukee</u>	<u>Total</u>
<u>Oneida Nation Commission on Aging</u>			
Nancy Barton	<u>575</u>	<u>63</u>	<u>638</u>
Judy Sprangers-Metoxen	<u>288</u>	<u>29</u>	<u>317</u>
Margaret King	<u>641</u>	<u>51</u>	<u>692</u>
Carla Lilly Doxtator	<u>295</u>	<u>39</u>	<u>334</u>
Wesley T. Martin Jr.	<u>361</u>	<u>27</u>	<u>388</u>
Cheryl Metoxen Stevens	<u>678</u>	<u>68</u>	<u>746</u>
Joan McLester	<u>307</u>	<u>36</u>	<u>343</u>
Carmen Escamea	<u>279</u>	<u>27</u>	<u>306</u>
<u>Oneida Nation School Board – Parent/Guardian</u>			
Denice E. Beans	<u>604</u>	<u>47</u>	<u>651</u>
Cassie Metoxen	<u>667</u>	<u>85</u>	<u>752</u>
Katsi Danforth	<u>919</u>	<u>75</u>	<u>994</u>
<u>Oneida Nation School Board – Community-at-Large</u>			
Dr. Fern Cornelius Diamond	<u>989</u>	<u>108</u>	<u>1097</u>
<u>Oneida Trust Enrollment Committee</u>			
Sadie Hill Kelley	<u>930</u>	<u>83</u>	<u>1013</u>
Jessica Powless	<u>903</u>	<u>82</u>	<u>985</u>
Cathy L. Metoxen	<u>364</u>	<u>60</u>	<u>424</u>
<u>Oneida Personnel Commission</u>			
Pearl B. Webster	<u>748</u>	<u>81</u>	<u>829</u>
Larry B. Smith	<u>665</u>	<u>58</u>	<u>723</u>
Denice E. Beans	<u>680</u>	<u>58</u>	<u>738</u>
David A. Webster	<u>672</u>	<u>75</u>	<u>747</u>
<u>Oneida Judiciary Court of Appeals – Chief Judge</u>			
Diane Danforth House	<u>594</u>	<u>64</u>	<u>658</u>
Patty Ninham-Hoeft	<u>706</u>	<u>69</u>	<u>775</u>
<u>Oneida Judiciary Court of Appeals – Judge</u>			
John Orie	<u>587</u>	<u>63</u>	<u>650</u>
Brenda L. John	<u>904</u>	<u>92</u>	<u>996</u>
<u>Oneida Judiciary Trial Court – Chief Judge</u>			
John E. Powless III	<u>1054</u>	<u>109</u>	<u>1163</u>
<u>Oneida Judiciary Trial Court – Judge</u>			
Peril Huff	<u>1063</u>	<u>108</u>	<u>1171</u>

4. TOTAL COSTS**General Election Expenses:**

TYPE	AMOUNT
Printing	\$2,878.64
Ballot/Flash Drives	\$1,496.57
Stipends*	\$6,581.25
Travel	\$1,485.80
Reimbursements	\$95.15
Total	<u>\$12,537.41</u>

*This amount includes the stipends for: election activities (06/25, 07/02, 07/10, 07/12), General Election Day (07/11), and meetings (07/13). Please note there are Election Board meetings called as necessary to prepare for elections.

5. ISSUES OF CONCERN

The Election Board, when planning for and conducting elections was met with few trials and tribulations and thoughts of what can be done better. Things that occurred and questions/concerns include the following:

- a) Need a larger location for Elections – needs to be more easily accessible for elders, people with disabilities.

6. REQUESTED ACTION:

- a) The Election Board hereby respectfully requests the Oneida Business Committee to comply with the Election Law, 102.11-13. Declaration of Results. The Business Committee shall declare the official results of the election. and send notices regarding when the swearing in of newly elected officials shall take place within ten (10) business days after receipt of the Final Report.

Accept the final closure recommendation for the remaining Tribal Contribution Savings Projects

Business Committee Agenda Request

1. Meeting Date Requested: *Click or tap to enter a date.*

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: *Choose or type justification.*

3. Requested Motion:

☐ Accept as information; OR

Accept report, send language and culture endowment resolution to Finance Committee, and adopt two resolutions.

4. Areas potentially impacted or affected by this request:

☒ Finance

☒ Programs/Services

☒ Law Office

☐ DTS

☐ Gaming/Retail

☐ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☒ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☒ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: Impacts individual boards, committees and commissions budgets, specifically
Personnel Commission and Gaming. | |

8. Submission:

Authorized Sponsor: Jo Anne House, Chief Counsel

Primary Requestor: (Name, Title/Entity)

Jo Anne House, PhD | Chief Counsel
James R. Bittorf | Deputy Chief Counsel
Kelly M. McAndrews | Deputy Chief Counsel

Krystal L. John, Senior Attorney
Carl J. Artman
Peggy A. Van Gheem
Basil J. Buchko, Jr.

Law Office



MEMORANDUM

TO: Oneida Business Committee

FROM: Jo Anne House, Chief Counsel
RaLinda Ninham Lamberies, Chief Financial Officer

DATE: August 19, 2026

SUBJECT: Tribal Contribution Savings - Closeout

The Oneida Nation received federal funding from the American Rescue Plan Act (ARPA) to fund government projects that would support the re-opening of the community after the COVID-19 Pandemic. Several reports have been accepted by the General Tribal Council and the Oneida Business Committee regarding the source and application of the funds. The Oneida Business Committee accepted and directed implementation of the use of the ARPA funds to fund government activities as authorized under the federal regulations. This resulted in an offset in Tribal Contributions to fund the budget which was set aside as Tribal Contribution Savings (TCS). TCS was obligated to CIP projects (*TCS CIP Projects*) or programming or programming (*TCS Programming Projects*), that were approved through a resolution.

The purpose of the project was to create infrastructure or programming that would offset the damaging effects of the pandemic. In some circumstances, TCS was used to purchase farm equipment intended to improve the ability to harvest white corn; in other cases, direct relief programs were created such as the Direct Membership Assistance program and the Student Relief program; finally, some were construction projects such as the Farmer's Market Vendor Cover.

The Oneida Business Committee adopted resolution # BC-03-11-26-A which provided notice that TCS Projects needed to be accounted for, the budgets submitted and reviewed, and a determination regarding whether the project still involved a pandemic related need or could be incorporated into the budgeting process and the TCS Project discontinued. The Oneida Business Committee identified that this would result in funding the CIP Set-Aside fund to meet the incremental savings goal for CIP projects. The resolution identified that additional review would be given to identify whether remaining funds would be placed in the CIP Set-Aside fund or placed in an endowment.

Between 2020 and 2026, most of those TCS Projects have been completed. There are 17 remaining open TCS Projects listed below. The information below, based on the 2026 third quarter report, the report on the directed budget submissions presented, and some follow-up with project owners, identifies the TCS Project, the amount obligated, the amount used as of August

Page 2

2026, the remaining funds, whether a budget was submitted, and whether the program remains consistent with the original TCS Project approval. In addition, a recommendation regarding the conclusion of the TCS project. The financial figures presented in this summary are estimates and will be subject to finalization as directed in the draft resolutions attached to this report.

For those TCS CIP Projects involving construction that are recommended to be closed, the remaining funds are either suggested to be placed in the CIP Set Aside or the potential Language and Culture Endowment. The suggestion to place remaining funds into the endowment is made where the TCS Project included some relationship to language and culture. Otherwise, the funds were recommended to go directly to CIP Set Aside for incremental funding savings for CIP projects.

For TCS Programming Projects that are recommended to be closed out, there is potential for future budgeting that would provide long-term funding consideration through the normal budgeting process. However, it is recognized that this is not possible for FY27 which has already been rolled up and is being presented to the General Tribal Council. For TCS Projects involving programming that are recommended to be closed, the recommendation is to place the funds in the potential Language and Culture Endowment. For those TCS Programming Projects where the funding has been recommended to be placed in an endowment, it is possible that some, or all, of the TCS Programming Projects could draft rules and participate in the endowment disbursement process.

Tribal Contribution Savings CIP Projects

CIP #15-001 Food Innovation Center (*Community Cannery*)

Obligated \$7,155,000
Spent \$4,244,324
Remaining \$2,901,676
Budget Submitted – Yes
Consistent with TCS Project Approval: Yes
Construction Underway – Yes, completion estimated October/November 2026.
Recommendation – Approve completion of project within remaining TCS budget, remaining funds upon completion to be transferred to CIP Set Aside Fund.

CIP #23-005 Residential Home Sites (*see Cattail Marsh*)

Obligated \$1,579,000
Spent \$ 306,448
Remaining \$1,272,552
Budget Submitted – Yes/No
Consistent with TCS Project Approval: Yes/No
Construction Underway – Yes, completion expected in November 2026.
Recommendation – Approve completion of Cattail Marsh site improvements, place remainder in CIP Set Aside Fund when completed.

CIP #21-111 Multi-Family Housing

Obligated \$7,367,366
Spent \$5,773,713

Page 3

Remaining \$1,593,653

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes, number of units reduced in finished project.

Construction Underway – No

Recommendation – Close out project, final report on expenses to be completed by end of November 2026, place remainder in CIP Set Aside Fund.

CIP # 21-105 Orchard Retail Building

Obligated \$1,500,000

Spent \$ 184,259

Remaining \$1,315,741

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – Yes

Recommendation – Approve completion of project within remaining TCS budget, place remaining funds in CIP Set Aside fund.

CIP # 19-007 Boundary Signage

Obligated \$502,900

Spent \$501,950

Remaining \$ 950

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – Yes

Recommendation – Close out project, place remaining funds in CIP Set Asides fund.

CIP # 22-115 Public Market

Obligated \$574,000

Spent \$350,000

Remaining \$224,000

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – No

Recommendation – Close out project, place remaining funds in CIP Set Asides fund.

CIP # 21-113 Farm Office

Obligated \$1,846,000

Spent \$1,780,307

Remaining \$ 65,693

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – Completed

Recommendation – Close out project, final report on expenses to be completed by end of November 2026, place remaining funds in CIP Set Asides fund.

Page 4

CIP # 19-004 Veteran's Wall & CIP # 24-104 Amelia Cornelius Culture Park (Visitors Center)

Obligated \$3,449,710

Spent \$1,311,393

Remaining \$2,138,317

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – No, final part of project redesign to meet budget expectations, redesign not completed and DPW garage removed to separate CIP.

Recommendation – Close out project, final report on expenses to be completed by end of November 2026, place remaining funds in CIP Set Asides fund.

Tribal Contribution Savings Programming Projects**Government Infrastructure Programs**

Obligated \$2,214,218

Spent \$1,719,911

Remaining \$. 494,307

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – No

Recommendation – Close out program at end of FY26, identify FY26 remaining expenses and contractual obligations, move remaining funds to CIP Set Aside Fund.

Early Childhood Programs

Obligated \$2,500,000

Spent \$ 380,881

Remaining \$2,119,119

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes, reduced programming because of lack of resources, increased donations and other funding options.

Construction Underway – N/A

Recommendation – Close out project at end of FY26, identify FY26 remaining expenses and contractual obligations, place remaining funds CIP Set Asides fund.

Public Arts and Arts Survey

Obligated \$150,000

Spent \$ 32,227

Remaining \$117,773

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – N/A

Recommendation – Close out project at end of FY26, identify FY26 remaining expenses and contractual obligations, place remaining funds in CIP Set Asides fund.

Oneida National Treasures Recognition

Obligated \$530,000

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Spent \$113,227

Remaining \$416,773

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – N/A

Recommendation – Close out project at end of FY26, identify FY26 remaining expenses and contractual obligations, place remaining funds in CIP Set Asides fund.

OLD & TLN Expansion Project

Obligated \$9,685,027

Spent \$3,100,000

Remaining \$6,585,027

Budget Submitted – Yes

Consistent with TCS Project Approval: No, changed from employment and programming to infrastructure and software.

Construction Underway – N/A

Recommendation – Close out project at end of FY26, identify FY26 remaining expenses and contractual obligations, place remaining funds in Language and Culture Endowment.

Change Management Initiatives Plan

Obligated \$884,553

Spent \$418,146

Remaining \$446,407

Budget Submitted – Yes

Consistent with TCS Project Approval: Yes

Construction Underway – N/A

Recommendation – Complete project through FY2027, place remaining funds in CIP Set Asides fund.

Onyoteka Project

Obligated

Spent

Remaining

Budget Submitted – Yes

Consistent with TSC Project Approval: Yes

Construction Underway - N/A

Recommendation – Complete project through FY2027, place remaining funds in Language and Culture Endowment.

Affordable Home Ownership Strategy Revolving Loan Program

Obligated \$8,000,000

Spent \$4,000,000

Remaining \$4,000,000

Budget Submitted – No

Consistent with TCS Project Approval: Yes

Construction Underway – N/A

Page 6

Recommendation – Assign remaining funds to CHD budget for final rule program implementation to be placed at Bay Bank.

800 MHZ Upgrade

Obligated

Spent

Remaining

Budget Submitted – No

Consistent with TCS Project Approval: Unknown

Construction Underway – Unknown

Recommendation – Close out project, place remaining funds on CIP Set Asides.

Based on the recommendations above, there are two sets of timelines needed - one for TCS CIP Projects and one for TCS Programming Projects. The timelines are based on the general information below for each group of TCS Projects in the first Resolve in each resolution. All TCS funds should be either placed in CIP Set Asides or Language and Culture Endowment by March 24, 2027.

- August 26, 2026: Oneida Business Committee meeting to act on the recommendations in this report.
- September 2026: Closing out FY2026 accounting, opening FY2017 accounting, preparing for Annual Audit, FY2027 Purchase Orders
- November 1, 2026: TCS CIP Projects completed, final expenses being identified by Project Manager, sent to accounting for verification.
- January 31, 2027: Accounting/CFO identifies the final tensioning amount of TCS for each TCS CIP and Programming Projects.
- March 2027: CFO makes final transfer of TCS funds to either CIP Set Asides or Language and Culture Endowment.
- April 14, 2027: Oneida Business Committee meeting to receive Report on Final TCS Transfers and verification that the TCS funds have been closed out.

Unfortunately, it is not possible to conclude TCS CIP Projects before September 30, 2026, and finalize all expenses in time to conclude the TCS funds in FY2026. However, the timeline recommended in the resolutions will allow the TCS CIP and Programming Projects to be completed in a timely manner.

There are four actions presented to the Oneida Business Committee based on the decisions you have made at the March 5, 2026 Work Session, the March 11, 2026 Oneida Business Committee meeting adoption of resolution # BC-03-11-26-A, and the review conducted at the August 12, 2026 Oneida Business Committee meeting after receipt of the reports.

1. Motion to accept the report,
2. Motion to send the draft Language and Culture Endowment resolution to the Finance Committee for action in accordance with the Endowments Law.
3. Motion to adopt resolution titled “Closure of TCS Projects Involving CIP Projects”.
4. Motion to adopt resolution titled “Closure of TSC Projects involving Programming”.

If you have further questions, please contact us.

Oneida Nation

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Phone: (920)869-2214



Oneida, WI 54155

BC Resolution # Leave this line blank Closure of Tribal Contribution Savings Projects Involving CIP Projects

- WHEREAS,** the Oneida Nation is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States of America; and
- WHEREAS,** the Oneida General Tribal Council is the governing body of the Oneida Nation; and
- WHEREAS,** the Oneida Business Committee has been delegated the authority of Article IV, Section 1, of the Oneida Tribal Constitution by the Oneida General Tribal Council; and
- WHEREAS,** the Oneida Nation received federal funds under the American Rescue Plan Act to assist in the recovery of the closure of the government as a result of the COVID-19 pandemic; and
- WHEREAS,** the Oneida Business Committee identified subject areas of priority to be addressed and set up a system where projects could be approved by resolution generally referred to as Tribal Contribution Savings Project (*TCS Projects*); and
- WHEREAS,** the General Tribal council, Oneida Business Committee and members have received reports on the use of TCS funds and other pandemic related funds; and
- WHEREAS,** it is now six years after the pandemic, many of the TCS Projects have been completed, while seventeen (17) remain TCS Projects open, of those, there are eight TCS CIP Projects; and
- WHEREAS,** the Oneida Business Committee has determined that TCS CIP Projects should be closed out if not completed as their continued operation results in additional costs associated with managing the CIP project, managing the accounting related to TCS funds, and continued gaps in the internal controls protecting the funds and governing expenditures; and
- WHEREAS,** the Oneida Business Committee has determined that remaining funds from TCS CIP Projects should be allocated to the CIP Set Aside fund which was created to manage funds that are maintained to fund construction projects through incremental savings as directed by the General Tribal Council on insert date or to the proposed Language and Culture Endowment intended to fund programming related to those subjects throughout the Oneida Nation organization; and
- WHEREAS,** the Oneida Business Committee has identified that TCS CIP Project regarding the visitor center at Amelia Cornelius Culture Park remains a priority community use project and has provided guidance on funding construction of the visitor center through the CIP process; and

NOW THEREFORE BE IT RESOLVED, project managers of the TCS CIP Projects listed below shall follow the timelines in this Resolve to close out the project and identify all final costs related to the project.

1. No later than November 1, 2026, all remaining expenses shall be identified by the Project Manager and reported to the accountant/CFO for verification.
2. No later than January 31, 2027, accountant/CFO shall identify the total of each TCS CIP Project expenses and identify the remaining funds not expended on the project.
3. No Later than March 15, 2027, the CFO shall make a final transfer for all TCS CIP Projects remaining funds into either CIP Set Aside or in a fund created for the Language and Culture Endowment as directed in this resolution.
4. A final report identifying the final transfers shall be placed on the March 24, 2027, regular Oneida Business Committee agenda for acceptance.

BE IT FURTHER RESOLVED, that **CIP #15-001 Food Innovation Center (*Community Cannery*)** shall be approved to complete the project no later than November 1, 2026, within remaining approved TCS CIP Project budget, and any remaining funds upon completion shall be transferred to CIP Set Aside.

BE IT FURTHER RESOLVED, that **CIP #23-005 Residential Home Sites (*see Cattail Marsh*)** shall be approved to complete the project no later than November 1, 2026, within remaining approved TCS CIP Project budget, and any remaining funds upon completion shall be transferred to CIP Set Aside.

BE IT FURTHER RESOLVED, that **CIP #21-111 Multi-Family Housing** shall be closed, no additional expenses to be incurred, and final expenses to be completed by end of November 1, 2026, place remainder in CIP Set Aside Fund.

BE IT FURTHER RESOLVED, that **CIP # 21-105 Orchard Retail Building** shall be approved to complete the project no later than March 2027, within remaining approved TCS CIP Project budget, and any remaining funds upon completion shall be transferred to CIP Set Aside.

BE IT FURTHER RESOLVED, that **CIP # 19-007 Boundary Signage** shall be approved to complete the project no later than November 1, 2026, within remaining approved TCS CIP Project budget, and any remaining funds upon completion shall be transferred to CIP **Set Aside or the Language and Culture Endowment.**

BE IT FURTHER RESOLVED, that **CIP # 22-115 Public Market** shall be closed, no additional expenses to be incurred, and final expenses to be completed by end of November 1, 2026, place remainder in CIP Set Aside Fund.

BE IT FURTHER RESOLVED, that **CIP # 21-113 Farm Office** shall be approved to complete the project no later than November 1, 2026, within remaining approved TCS CIP Project budget, and any remaining funds upon completion shall be transferred to **CIP Set Aside or the Language and Culture Endowment.**

BE IT FURTHER RESOLVED, that **CIP # 19-004 Veteran's Wall and CIP # 24-104 Amelia Cornelius Culture Park (*Visitors Center*)** shall be closed, no additional expenses to be incurred, and final expenses to be completed by end of November 1, 2026, place remainder in **CIP Set Aside Fund or the Language and Culture Endowment.**



Oneida Nation
 Oneida Business Committee
 Legislative Operating Committee
 PO Box 365 • Oneida, WI 54155-0365
Oneida-nsn.gov



Statement of Effect *Closure of TCS Projects Involving CIP Projects*

Summary

This resolution provides timelines for identified TCS CIP Projects to close out the project and identify all final costs related to the project.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: August 18, 2026

Analysis by the Legislative Reference Office

The Oneida Nation received federal funds through the American Rescue Plan Act of 2021 (ARPA) funds to address matters arising out of the COVID-19 pandemic. The Oneida Business Committee has approved application of ARPA funds to lost revenue and allocation of tribal funds to the ARPA Federal Rescue Funds to investments in the “Lost Revenue” line (ARPA FRF LR) in the Investment Report. The savings from the application of these funds has resulted in tribal funds being placed in the line “Tribal Contribution Savings” in the Investment Report presented in the Treasurer’s Report”

The Oneida Business Committee determined that these funds should be used as set out in resolution BC-06-09-21-B, *Setting Goals for Application of Funding from the American Rescue Plan Act of 2021 to Direct Support to Individuals, Families, Community and the Oneida Nation*, as amended by resolution BC-06-23-21-C, *Amendment # 1 to the American Rescue Plan Act of 2021 Investment Allocation to Direct Membership Assistance*. In resolution BC-06-09-21-B, the Oneida Business Committee identified that the primary applications for the use of ARPA FRF would be to aid members and create tangible benefits related to housing, food sovereignty, education, and culture. In addition, the Oneida Business Committee directed the ARPA FRF to be spread across a three (3) year period in eight (8) specific categories to guide expenditures to meet such primary applications in an informed and transparent manner through the approval of projects by resolution.

After the adoption of resolution BC-06-09-21-B, the Oneida Business Committee received information which indicated that there was a more immediate need to address the pandemic’s twelve (12) to fifteen (15) month negative impact on the membership’s access to jobs, education, healthcare, and housing. The Oneida Business Committee then adopted resolution BC-06-23-21-C, *Amendment # 1 to the American Rescue Plan Act of 2021 Investment Allocation to Direct Membership Assistance*, which amended resolution BC-06-09-21-B to reflect its decision, which, more specifically, was to apply the 45% Direct Membership Assistance payment of three thousand dollars (\$3,000) in the current fiscal year, with any remaining funds after the payment to be allocated in Fiscal Years 2022 and 2023. Additionally, resolution BC-06-23-21-C provided clarification on the eligibility for membership assistance general welfare exclusion payments, application period, obligation, and ability to approve projects across fiscal years; and directed that the allocations be reviewed at least each fiscal year to determine whether modifications should be

made. The work sheet that was attached to resolution BC-06-09-21-B was also deleted by resolution BC-06-23-21-C and replaced with the work sheet attached thereto, entitled, *American Recovery Plan Act – FRF; Lost Revenue; ARPA FRF LR Investments – Updated June 23, 2021*.

The Oneida Business Committee was then presented with recommended amendments to the processes based on implementation of the June 2021 resolutions, application of ARPA FRF through the lost revenue formula, identification of direct use and Tribal Contribution Savings. The Oneida Business Committee reviewed the recommendations and determined that the recommended amendments offer clarification in the processes and provide reporting at intervals that will keep all parties informed on the status of approved projects. The Oneida Business Committee then adopted resolution BC-03-30-22-A, *Updating Tribal Contribution Savings Processes and Allocations*, which superseded the processes identified in Resolve #6 of resolution BC-06-09-21-B, as amended by Resolve #2 of resolution BC-06-23-21-C and adopted a new project approval process which was to be supplemented with needed Standard Operating Procedures approved by the FRF Program Office.

Resolution BC-03-30-22-A had certain responsibilities delegated to the Strategic Planner. For the 2023-2026 term the Oneida Business Committee has removed the Strategic Planner from the approved positions for the support of the Oneida Business Committee. The Oneida Business Committee has identified a need to amend the reporting process and provide the membership reporting on the status of the TC Savings projects funds. Through the adoption of resolution BC-05-22-24-A, Amending BC Resolution 03-30-22-A, *Updating Tribal Contribution Savings Processes and Allocations*, the Oneida Business Committee amends the reporting process identified in resolution BC 03-30-22-A to address reporting by the project owner and the Chief Financial Officer. This resolution also provides that the resolution BC-03-30-22-A updated Tribal Contributions Savings Allocation spreadsheet is the last approved Tribal Contribution Savings Allocation spreadsheet and is attached to the amended BC resolution.

Resolution BC-03-11-26-A, *Directive For Tribal Contribution Savings Projects*, then had the Oneida Business Committee directing that for all open Tribal Contribution Savings projects, no extensions shall be considered for existing projects, and any remaining projects with a completion deadline longer than September 30, 2028 shall be adjusted to have a completion deadline of September 30, 2028; each project shall submit a detailed budget by year on how they will spend the funds for that project by end of business on June 15, 2026, and any project not submitting a detailed budget shall be considered closed, no further funding may be expended, and the remaining funds shall be unobligated; no project shall include expenses for employment related expenditures after September 30, 2026, recognizing that Education and Training Administration, Government Administration Office, Language Department, and the Arts Program have employment related expenditures in FY2026; and no changes in scope to the project will be approved. This resolution also directed that all unobligated Tribal Contribution Savings funds be transferred to the CIP Set Asides located in the Investments Report in the Treasurer's Report with a memo from the Chief Financial Officer to be placed in the Oneida Business Committee meeting record of the amount that was transferred. Finally, this resolution directed that any remaining funds at the conclusion of any approved project be transferred to the CIP Set Asides located in the Investments Report in the Treasurer's Report shall be noted on the Oneida Business Committee as information regarding the amount to be transferred to CIP Set Asides or redirected by the Oneida Business Committee to be

placed in an endowment. The development of any new endowments for the Nation would be required to follow the process and procedures of the Endowments law. *[1 O.C. 131]*.

It is now six (6) years after the pandemic, and many of the TCS Projects have been completed, while seventeen (17) TCS Projects remain open, of those, there are eight (8) TCS CIP Projects. This resolution provides that the Oneida Business Committee has determined that TCS CIP Projects should be closed out if not completed as their continued operation results in additional costs associated with managing the CIP project and a lack of urgency in completion. The Oneida Business Committee has determined that remaining funds from TCS CIP Projects should be allocated to the CIP Set Aside fund which was created to manage CIP funding requests through incremental savings as directed by the General Tribal Council or to the proposed Language and Culture Endowment intended to fund programming related to those subjects throughout the Oneida Nation organization.

Through the adoption of this resolution, project managers of the identified TCS CIP Projects are directed to follow the timelines in this Resolve to close out the project and identify all final costs related to the project.

1. No later than November 1, 2026, all remaining expenses shall be identified by the Project Manager and reported to the accountant/CFO for verification.
2. No later than January 31, 2027, accountant/CFO shall identify the total of each TCS CIP Project expenses and identify the remaining funds not expended on the project.
3. No Later than March 15, 2027, the CFO shall make a final transfer for all TCS CIP Projects remaining funds into either CIP Set Aside.
4. A final report identifying the final transfers shall be placed on the April 14, 2027, regular Oneida Business Committee agenda for acceptance.

This resolution then identifies the following TCS CIP Projects and provides specific project completion timelines and directives for remaining funds upon completion to be transferred to CIP Set Aside:

- CIP #15-001 Food Innovation Center (Community Cannery);
- CIP #23-005 Residential Home Sites (see Cattail Marsh);
- CIP #21-111 Multi-Family Housing;
- CIP # 21-105 Orchard Retail Building;
- CIP # 19-007 Boundary Signage;
- CIP # 22-115 Public Market;
- CIP # 21-113 Farm Office; and
- CIP # 19-004 Veteran's Wall and CIP # 24-104 Amelia Cornelius Culture Park (Visitors Center).

Conclusion

Adoption of this resolution would not conflict with any of the Nation's laws.

Oneida Nation

Post Office Box 365

Phone: (920)869-2214



Oneida, WI 54155

BC Resolution # Leave this line blank Closure of Tribal Contribution Savings Projects Involving Programming

- 1
2
3 **WHEREAS,** the Oneida Nation is a federally recognized Indian government and a treaty tribe
4 recognized by the laws of the United States of America; and
5
6 **WHEREAS,** the Oneida General Tribal Council is the governing body of the Oneida Nation; and
7
8 **WHEREAS,** the Oneida Business Committee has been delegated the authority of Article IV, Section 1,
9 of the Oneida Tribal Constitution by the Oneida General Tribal Council; and
10
11 **WHEREAS,** the Oneida Nation received federal funds under the American Rescue Plan Act to assist in
12 the recovery of the closure of the government as a result of the COVID-19 pandemic; and
13
14 **WHEREAS,** the Oneida Business Committee identified subject areas of priority to be addressed and
15 set up a system where projects could be approved by resolution generally referred to as
16 Tribal Contribution Savings Project (*TCS Projects*); and
17
18 **WHEREAS,** the General Tribal council, Oneida Business Committee and members have received
19 reports on the use of TCS funds and other pandemic related funds; and
20
21 **WHEREAS,** it is now six years after the pandemic, many of the TCS Projects have been completed,
22 while seventeen (17) remain TCS Projects open, of those, there are nine TCS
23 Programming Projects; and
24
25 **WHEREAS,** the Oneida Business Committee has determined that TCS Programming Projects should
26 be closed out as their continued operation results in additional costs associated with
27 managing the programming project, managing the accounting related to TCS funds, and
28 continued gaps in the internal controls protecting the funds and governing expenditures
29 and further funding to these programs should be allocated through the budgeting process
30 for long term continuity that TCS Project funding does not allow and that some of these
31 programs could be funded through the proposed Language and Culture Endowment
32 through rulemaking and the endowment disbursement process; and
33
34 **WHEREAS,** the Oneida Business Committee has determined that remaining funds from TCS
35 Programming Projects should be allocated to the CIP Set Aside fund which was created to
36 manage funds that are maintained to fund construction projects through incremental
37 savings as directed by the General Tribal Council on insert date, or to the proposed
38 Language and Culture Endowment intended to fund programming related to those subjects
39 throughout the Oneida Nation organization; and
40

41 **NOW THEREFORE BE IT RESOLVED**, project managers of the TCS Programming Projects listed below
42 shall follow the timelines in this Resolve to close out the project and identify all final costs related to the
43 project.

- 44 1. No later than September 30, 2026, all remaining expenses shall be identified by the Project
45 Manager and reported to the accountant/CFO for verification.
- 46 2. No later than January 31, 2027, accountant/CFO shall identify the total of each TCS Programming
47 Project expenses and identify the remaining funds not expended on the project.
- 48 3. No Later than March 15, 2027, the CFO shall make a final transfer for all TCS Programming
49 Projects remaining funds into either CIP Set Aside or in a fund created for the Language and Culture
50 Endowment as directed in this resolution.
- 51 4. A final report identifying the final transfers shall be placed on the March 24, 2027, regular Oneida
52 Business Committee agenda for acceptance.

53
54 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Government Infrastructure Programs**
55 shall be closed out at end of FY26, identify FY26 remaining expenses and contractual obligations, and
56 move remaining funds to **CIP Set Aside Fund or Language and Culture Endowment**.

57
58 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Early Childhood Programs** shall be closed
59 out at end of FY26, identify FY26 remaining expenses and contractual obligations, and move remaining
60 funds to **CIP Set Aside Fund or Language and Culture Endowment**.

61
62 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Public Arts and Arts Survey** shall be
63 closed out at end of FY26, identify FY26 remaining expenses and contractual obligations, and move
64 remaining funds to **CIP Set Aside Fund or Language and Culture Endowment**.

65
66 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Oneida National Treasures Recognition**
67 shall be closed out at end of FY26, identify FY26 remaining expenses and contractual obligations, and
68 move remaining funds to **CIP Set Aside Fund or Language and Culture Endowment**.

69
70 **BE IT FURTHER RESOLVED**, that TCS Programming Project **OLD & TLN Expansion Project** shall be
71 closed out at end of FY26, identify FY26 remaining expenses and contractual obligations, and move
72 remaining funds to Language and Culture Endowment.

73
74 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Change Management Initiatives Plan** shall
75 be closed out at end of FY27, identify FY27 remaining expenses and contractual obligations by September
76 30, 2026, and move remaining funds to **CIP Set Aside Fund or Language and Culture Endowment**.

77
78 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Onyoteka Project** shall be closed out at
79 end of FY27, identify FY27 remaining expenses and contractual obligations by September 30, 2026, and
80 move remaining funds to **CIP Set Aside Fund or Language and Culture Endowment**.

81
82 **BE IT FURTHER RESOLVED**, that TCS Programming Project **Affordable Home Ownership Strategy**
83 **Revolving Loan Program** shall be closed out and the \$4,000,000 remaining in the fund shall be transferred
84 to the Comprehensive Housing Division to fund the program developed in Rule # ____, [insert name].

85
86 **BE IT FURTHER RESOLVED**, that TCS Programming Project **800 MHZ Upgrade** shall be closed out at
87 end of FY26, identify FY26 remaining expenses and contractual obligations, and move remaining funds to
88 **CIP Set Aside Fund or Language and Culture Endowment**.



Oneida Nation
 Oneida Business Committee
 Legislative Operating Committee
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Statement of Effect *Closure of TCS Projects Involving Programming*

Summary

This resolution provides timelines for identified TCS Programming Projects to close out the project and identify all final costs related to the project.

Submitted by: Clorissa N. Leeman, Senior Staff Attorney, Legislative Reference Office

Date: August 18, 2026

Analysis by the Legislative Reference Office

The Oneida Nation received federal funds through the American Rescue Plan Act of 2021 (ARPA) funds to address matters arising out of the COVID-19 pandemic. The Oneida Business Committee has approved application of ARPA funds to lost revenue and allocation of tribal funds to the ARPA Federal Rescue Funds to investments in the “Lost Revenue” line (ARPA FRF LR) in the Investment Report. The savings from the application of these funds has resulted in tribal funds being placed in the line “Tribal Contribution Savings” in the Investment Report presented in the Treasurer’s Report”

The Oneida Business Committee determined that these funds should be used as set out in resolution BC-06-09-21-B, *Setting Goals for Application of Funding from the American Rescue Plan Act of 2021 to Direct Support to Individuals, Families, Community and the Oneida Nation*, as amended by resolution BC-06-23-21-C, *Amendment # 1 to the American Rescue Plan Act of 2021 Investment Allocation to Direct Membership Assistance*. In resolution BC-06-09-21-B, the Oneida Business Committee identified that the primary applications for the use of ARPA FRF would be to aid members and create tangible benefits related to housing, food sovereignty, education, and culture. In addition, the Oneida Business Committee directed the ARPA FRF to be spread across a three (3) year period in eight (8) specific categories to guide expenditures to meet such primary applications in an informed and transparent manner through the approval of projects by resolution.

After the adoption of resolution BC-06-09-21-B, the Oneida Business Committee received information which indicated that there was a more immediate need to address the pandemic’s twelve (12) to fifteen (15) month negative impact on the membership’s access to jobs, education, healthcare, and housing. The Oneida Business Committee then adopted resolution BC-06-23-21-C, *Amendment # 1 to the American Rescue Plan Act of 2021 Investment Allocation to Direct Membership Assistance*, which amended resolution BC-06-09-21-B to reflect its decision, which, more specifically, was to apply the 45% Direct Membership Assistance payment of three thousand dollars (\$3,000) in the current fiscal year, with any remaining funds after the payment to be allocated in Fiscal Years 2022 and 2023. Additionally, resolution BC-06-23-21-C provided clarification on the eligibility for membership assistance general welfare exclusion payments, application period, obligation, and ability to approve projects across fiscal years; and directed that the allocations be reviewed at least each fiscal year to determine whether modifications should be

made. The work sheet that was attached to resolution BC-06-09-21-B was also deleted by resolution BC-06-23-21-C and replaced with the work sheet attached thereto, entitled, *American Recovery Plan Act – FRF; Lost Revenue; ARPA FRF LR Investments – Updated June 23, 2021*.

The Oneida Business Committee was then presented with recommended amendments to the processes based on implementation of the June 2021 resolutions, application of ARPA FRF through the lost revenue formula, identification of direct use and Tribal Contribution Savings. The Oneida Business Committee reviewed the recommendations and determined that the recommended amendments offer clarification in the processes and provide reporting at intervals that will keep all parties informed on the status of approved projects. The Oneida Business Committee then adopted resolution BC-03-30-22-A, *Updating Tribal Contribution Savings Processes and Allocations*, which superseded the processes identified in Resolve #6 of resolution BC-06-09-21-B, as amended by Resolve #2 of resolution BC-06-23-21-C and adopted a new project approval process which was to be supplemented with needed Standard Operating Procedures approved by the FRF Program Office.

Resolution BC-03-30-22-A had certain responsibilities delegated to the Strategic Planner. For the 2023-2026 term the Oneida Business Committee has removed the Strategic Planner from the approved positions for the support of the Oneida Business Committee. The Oneida Business Committee has identified a need to amend the reporting process and provide the membership reporting on the status of the TC Savings projects funds. Through the adoption of resolution BC-05-22-24-A, Amending BC Resolution 03-30-22-A, *Updating Tribal Contribution Savings Processes and Allocations*, the Oneida Business Committee amends the reporting process identified in resolution BC 03-30-22-A to address reporting by the project owner and the Chief Financial Officer. This resolution also provides that the resolution BC-03-30-22-A updated Tribal Contributions Savings Allocation spreadsheet is the last approved Tribal Contribution Savings Allocation spreadsheet and is attached to the amended BC resolution.

Resolution BC-03-11-26-A, *Directive For Tribal Contribution Savings Projects*, then had the Oneida Business Committee directing that for all open Tribal Contribution Savings projects, no extensions shall be considered for existing projects, and any remaining projects with a completion deadline longer than September 30, 2028 shall be adjusted to have a completion deadline of September 30, 2028; each project shall submit a detailed budget by year on how they will spend the funds for that project by end of business on June 15, 2026, and any project not submitting a detailed budget shall be considered closed, no further funding may be expended, and the remaining funds shall be unobligated; no project shall include expenses for employment related expenditures after September 30, 2026, recognizing that Education and Training Administration, Government Administration Office, Language Department, and the Arts Program have employment related expenditures in FY2026; and no changes in scope to the project will be approved. This resolution also directed that all unobligated Tribal Contribution Savings funds be transferred to the CIP Set Asides located in the Investments Report in the Treasurer's Report with a memo from the Chief Financial Officer to be placed in the Oneida Business Committee meeting record of the amount that was transferred. Finally, this resolution directed that any remaining funds at the conclusion of any approved project be transferred to the CIP Set Asides located in the Investments Report in the Treasurer's Report shall be noted on the Oneida Business Committee as information regarding the amount to be transferred to CIP Set Asides or redirected by the Oneida Business Committee to be

placed in an endowment. The development of any new endowments for the Nation would be required to follow the process and procedures of the Endowments law. [1 O.C. 131].

It is now six (6) years after the pandemic, and many of the TCS Projects have been completed, while seventeen (17) TCS Projects remain open, of those, there are nine (9) TCS Programming Projects. This resolution provides that the Oneida Business Committee has determined that TCS Programming Projects should be closed out if not completed as their continued operation results in additional costs associated with managing the programming project, managing the accounting related to TCS funds, and further funding to these programs should be allocated through the budgeting process for long term continuity that TCS Project funding does not allow and that some of these programs could be funded through the proposed Language and Culture Endowment through rulemaking and the endowment disbursement process. The Oneida Business Committee has determined that remaining funds from TCS Programming Projects should be allocated to the CIP Set Aside fund which was created to manage funds that are maintained to fund construction projects through incremental savings as directed by the General Tribal Council or to the proposed Language and Culture Endowment intended to fund programming related to those subjects throughout the Oneida Nation organization.

Through the adoption of this resolution, project managers of the identified TCS Programming Projects are directed to follow the timelines in this Resolve to close out the project and identify all final costs related to the project.

1. No later than September 30, 2026, all remaining expenses shall be identified by the Project Manager and reported to the accountant/CFO for verification.
2. No later than January 31, 2027, accountant/CFO shall identify the total of each TCS Programming Project expenses and identify the remaining funds not expended on the project.
3. No Later than March 15, 2027, the CFO shall make a final transfer for all TCS Programming Projects remaining funds into either CIP Set Aside or in a fund created for the Language and Culture Endowment as directed in this resolution.
4. A final report identifying the final transfers shall be placed on the April 14, 2027, regular Oneida Business Committee agenda for acceptance.

This resolution then identifies the following TCS Programming Projects and provides specific project completion timelines and directives for the transfer of remaining funds upon completion:

- Government Infrastructure Programs;
- Early Childhood Programs;
- Public Arts and Arts Survey;
- Oneida National Treasures Recognition;
- OLD & TLN Expansion Project;
- Change Management Initiatives Plan;
- Onyoteka Project;
- Affordable Home Ownership Strategy Revolving Loan Program; and
- 800 MHZ Upgrade.

Conclusion

Adoption of this resolution would not conflict with any of the Nation's laws.

Oneida Nation

Post Office Box 365

Phone: (920)869-2214



Oneida, WI 54155

BC Resolution # Leave this line blank

Creation of Language and Culture Endowment in Accordance with the Endowments Law

DRAFT

WHEREAS, the Oneida Nation is a federally recognized Indian government and a treaty tribe recognized by the laws of the United States of America; and

WHEREAS, the Oneida General Tribal Council is the governing body of the Oneida Nation; and

WHEREAS, the Oneida Business Committee has been delegated the authority of Article IV, Section 1, of the Oneida Tribal Constitution by the Oneida General Tribal Council; and

Endowments Law

WHEREAS, the Oneida Business Committee adopted the Endowments Law in 2005 and current amendments adopted by resolution # BC-04-12-17-D which sets forth how endowments are created and managed endowment fund accounts which are intended as a perpetual source of funding for specific purposes, and endowment fund accounts could be used to provide funding for programming and services for the present and future generations of Oneida people, *1 O.C. 131.1-2*; and

WHEREAS, the Finance Committee has been delegated the responsibility to review proposed endowments, conduct a notice and comment opportunity, and make recommendations on creating endowments, *1 O.C. 131.5*; and

WHEREAS, the Oneida Business Committee is responsible for approval of the creation of endowments through resolutions which identify the purpose, initial principal, future principal payments, how and when interest can be disbursed, and how endowments are reviewed for effectiveness, *1 O.C. 131.4*; and

WHEREAS, the Trust Enrollment Committee has been delegated responsibility for managing the principal of endowments and identifying interest income which can be used for programming and services, *1 O.C. 131.6*; and

Language and Culture Funding

WHEREAS, the Oneida Business Committee, acting on behalf of the General Tribal Council, adopted resolution # BC-01-28-04-A, *Resolution Designating the Interest from Unclaimed or Unallocated Per Capita Funds to be Applied to the Oneida Language Revitalization Program*,¹ and the current account, as of February 2026, contains an estimated \$3 million, *1 O.C. 123.5-5*; and

¹ NOTE: This is not changing the nature of the fund created under the Per Capita law, it should not be necessary to go to the General Tribal Council to approve the funds placed in this proposed endowment.

WHEREAS, as part of the financial resources provided from the federal government the Oneida Business Committee obligated \$9.7 million Tribal Contribution Savings in resolution # BC-07-27-22-O, *Obligation for Oneida Language Department (OLD) and Tehatiw^nahkwa Language Nest (TLN) Expansion Project Utilizing Tribal Contribution Savings*, for a project to be concluded by September 30, 2028, which has been delayed in its implementation and the project owners are requesting extension of the deadline; and

WHEREAS, the Oneida Business Committee adopted resolution # BC-03-11-26-A, *Directive for Tribal Contribution Savings Projects*, which identified that all projects must be completed by September 30, 2028, no changes in the scope of the project would be approved, and that no employment related expenses could be paid through Tribal Contribution Savings as there has been sufficient time to complete projects and extending the deadline would not be in keeping with the purpose of the original funding to address COVID-19 related issues, and that there was no ongoing resource for employment at the conclusion of the project; and

Language and Culture Revitalization

WHEREAS, for many decades the Oneida Nation, through the Oneida Business Committee and General Tribal Council, as well as through the members through action on referendum questions, has expressed a commitment to revitalizing our language and our culture; and

WHEREAS, each budget has contained funding allocations for:

- children through adult language education;
- cultural learning through the Cultural Heritage Center;
- cultural arts through the Arts Program;
- protection of our historical sites through the Tribal Historic Preservation Office;
- education of our history, language, and ways in our kindergarten through 12th grade school system; and
- presentation of our history within the Oneida Nation Museum; and

WHEREAS, the Oneida Business Committee believes that these two sources of funding (Language Revitalization and Tribal Contribution Savings project language expansion) should be combined to create an endowment of approximately \$9.5 million which would result in immediate funding resources for language and culture revitalization; and

WHEREAS, the Oneida Business Committee has determined that creation of an endowment would result in long-term funding and stabilization of the existing programming through the growth in the endowment interest income; and

Purpose of Language and Culture Revitalization Endowment

WHEREAS, the purpose of this endowment is to provide funding for programming related to teaching the Oneida language, our culture, our ways and our history; and

WHEREAS, programs and services funded through this endowment shall have measurable metrics regarding success and improvement; and

WHEREAS, programs and services funded through this endowment shall not use funding for employment related expenses until such time as the endowment disbursements are allocated for Priority #4; and

WHEREAS, the Endowments law directs that the Oneida Business Committee shall approve or disapprove an endowment recommendation made by the Finance Committee 1 O.C. 131.5-1: and

WHEREAS, the Endowments law identifies that “before the Finance Committee establishes any endowment fund account the Oneida Finance Committee shall publish notice in official media outlets of the Nation a minimum of ten (10) business days prior to a public meeting on the proposed endowment”, 1 O.C. 131.5-1(a), and the public meeting was scheduled on [insert date] and all comments and viewpoints were considered in the final draft of the endowment creation resolution; and

WHEREAS, the Finance Committee, at a meeting on [insert date], adopted a motion recommending the creation of the Language and Culture Endowment;

Endowment Created

NOW THEREFORE BE IT RESOLVED, the Oneida Business Committee does hereby establish, in accordance with section 131.4-1(a) of the Endowments law, the Language and Culture Endowment, and directs that such funds held and invested in the Language Revitalization Fund (approximately \$3 million) and the obligation of Tribal Contribution Savings from resolution # BC-07-27-22-O (approximately \$6.5 million) shall be placed in the Language and Culture Endowment.

BE IT FURTHER RESOLVED, that the obligation in resolution # BC-07-27-22-O, excluding the expenditures already incurred, is hereby repealed.

Purpose of Endowment

BE IT FURTHER RESOLVED, the Oneida Business Committee does hereby further direct that the Language and Culture Endowment shall be used for the purposes of creating programs and activities which shall support –

- Priority 1: language education programming until distribution allocation reaches [\$100,000]; and
- Priority 2: cultural education programming until distribution allocation reaches [\$200,000]; and
- Priority 3: history education programming until distribution allocation reaches [\$200,000]; and
- Priority 4: programming, improvements and acquisitions for the Oneida Nation Museum.

Funding from any Priority not fully utilized may be used for any other Priority. Once funded, the allocation of funding within a Priority shall continue from budget-to-budget until the programming rule is either repealed or modified.

BE IT FURTHER RESOLVED, the Trust Enrollment Committee, in accordance with sections 131.6-7 of the Endowments law, shall develop the appropriate Standard Operating Procedures and necessary endowment documentation to set the investment policies and fully implement the investment goals to fund the priorities set forth in this resolution.

Disbursements of Endowment Income

BE IT FURTHER RESOLVED, the Oneida Business Committee directs that no disbursements from the Language and Culture Endowment shall be made until the endowment principal reaches \$15,000,000 at which point disbursements will be made at [50%] of the interest income as calculated according to section 131.8-2 of the Endowment Law. This disbursement level may be increased up to 75% or decreased down to 0% by a two-thirds vote of the total number of members of the Finance Committee and a subsequent two-thirds vote of the total number of members of the Oneida Business Committee.

BE IT FURTHER RESOLVED, the Chief Financial Officer may approve more specific Standard Operating Procedures to implement the general rules outlined in this Resolve.

1. Programs shall forward a list of adopted rules and the priority addressed to the Treasurer and Chief Financial Officer on or before November 1st of each year.
2. On or before January 31st of each year the Trust Enrollment Department shall forward to the Treasurer and Chief Financial Officer an estimated disbursement from the endowment.
3. The Treasurer and Chief Financial Officer shall notify programs which have rules adopted under the Administrative Rulemaking law in accordance with the purpose of the Language and Culture Endowment of the availability of funds.
4. Programs with adopted rules under the Administrative Rulemaking law shall cooperatively identify how such funds shall be allocated within the proposed budget and forward the allocation determinations to the Chief Financial Officer on or before February 28th of each year. Failure to submit a cooperatively developed allocation by the deadline shall result in the funds being returned to the endowment as principal.
5. The Trust Enrollment Department shall provide an update on the estimated disbursement on or before July 1st of each year to the Treasurer and Chief Financial Officer, who shall notify programs with adopted rules under the Administrative Rulemaking law of the updated estimated disbursement amount. Excess over the initial disbursement estimate shall be returned to the endowment as principal, shortages under the initial disbursement estimate shall require all programs utilizing the funds to collaboratively determine how expenses shall be reduced. No additional tribal contribution shall be made. Failure to submit a cooperatively developed reduced allocation by July 30th shall result in the funds being returned to the endowment as principal.
6. The Trust Enrollment Department shall make the authorized disbursement to the Nation's banking account(s) as identified by the Chief Financial Officer during the month of October.
7. Funds disbursed from an endowment shall not displace tribal contribution from the Nation's general fund until such time as the fund disbursements reach Priority #3. Provided that, reductions to programs based on budgeting processes shall not be prohibited.

BE IT FURTHER RESOLVED, that rules are authorized under s. 131.11-1 of the Endowment Law to any program that meets the priorities listed in the Language and Culture Endowment and shall specifically identify this resolution number, title of the resolution, and the specific priority being addressed by the rule.

BE IT FURTHER RESOLVED, that endowment disbursements under Rules cannot be allocated to costs associated with employment related expenses until Priority #4 has begun being funded.

BE IT FURTHER RESOLVED, that in any year in which there are no programming rules approved under the Administrative Rulemaking law or in which there are insufficient specific requests based on existing programming rules approved under the Administrative Rulemaking law, or the program fails to fully utilize the funds for the purpose for which the funds were disbursed in the fiscal year the funds were disbursed, excess funds shall be remain in the endowment as principal.

Endowment Reporting

BE IT FURTHER RESOLVED, that the Trust Enrollment Committee shall report to the General Tribal Council, in the Annual meeting materials, the status of the endowment with the following minimum information.

1. *Principal*. Current principal and history of the growth of the principal in reasonable increments from the establishment of the endowment.
2. *Investment Income*. Current investment income and history of investment income in reasonable increments from the establishment of the endowment.
3. *Disbursements*. Current disbursement and history of disbursement in reasonable increments from the establishment of the endowment.
4. *Future/Trends*. Projections of estimated future growth of the principal and investment income in reasonable increments for a minimum of 20 years.
5. *Investment policy*. The investment policy and types of investments made regarding the endowment.

195
196 **BE IT FURTHER RESOLVED**, that the Treasurer shall include in the Annual Report a list of the titles of
197 endowments which have disbursements, how disbursements were allocated in the budget, and include a
198 list of titles of Rules regarding the use of the endowment disbursement.
199

200 **BE IT FURTHER RESOLVED**, that the any program which utilizes Language and Culture Endowment
201 Funds shall include in the quarterly reports to the Oneida Business Committee and the Annual Report a list
202 of Rules regarding the use of the funds, the amount of endowment funding allocated, and disbursements
203 made during the reporting period for quarterly reports and an aggregate reporting in the Annual Report.
204

205 *Funding Endowment*

206 **BE IT FINALLY RESOLVED**, that the Oneida Business Committee directs the Treasurer to budget at least
207 **[\$500,000]** each fiscal year to the Language and Culture Endowment for a minimum of **10** years. At the end
208 of 10 years, the Finance Committee shall review the endowment principal, interest income, and distributions
209 to determine whether additional contributions are necessary to help reach the long-term goals for language
210 and culture programming.

Accept the Emergency Management FY-2026 3rd quarter report

Business Committee Agenda Request

1. Meeting Date Requested: 8/12/26

2. Session:

☒

Open

☐

Executive – must qualify under §107.4-1.

Justification: Choose or type justification

3. Requested Motion:

☒

Accept as information; OR

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☐

Gaming/Retail

☐

Boards, Committees, or Commissions

☒

Other: N/A

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|--|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☒ Other: OEMG Training and EAP C | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: Kaylynn Biely, Emergency Management Director

Primary Requestor: (Name, Title/Entity)

Kaylynn Biely – Director Emergency Management Department

Objectives and Metrics

Mission Statemement

Through planning and mitigation activities Emergency Management works to ensure the Oneida Nation is in a constant state of readiness to respond to, and recover from an emergency or disaster, that threatens the life or safety of community members, the environment, or the assets of the Oneida Nation.

Purpose

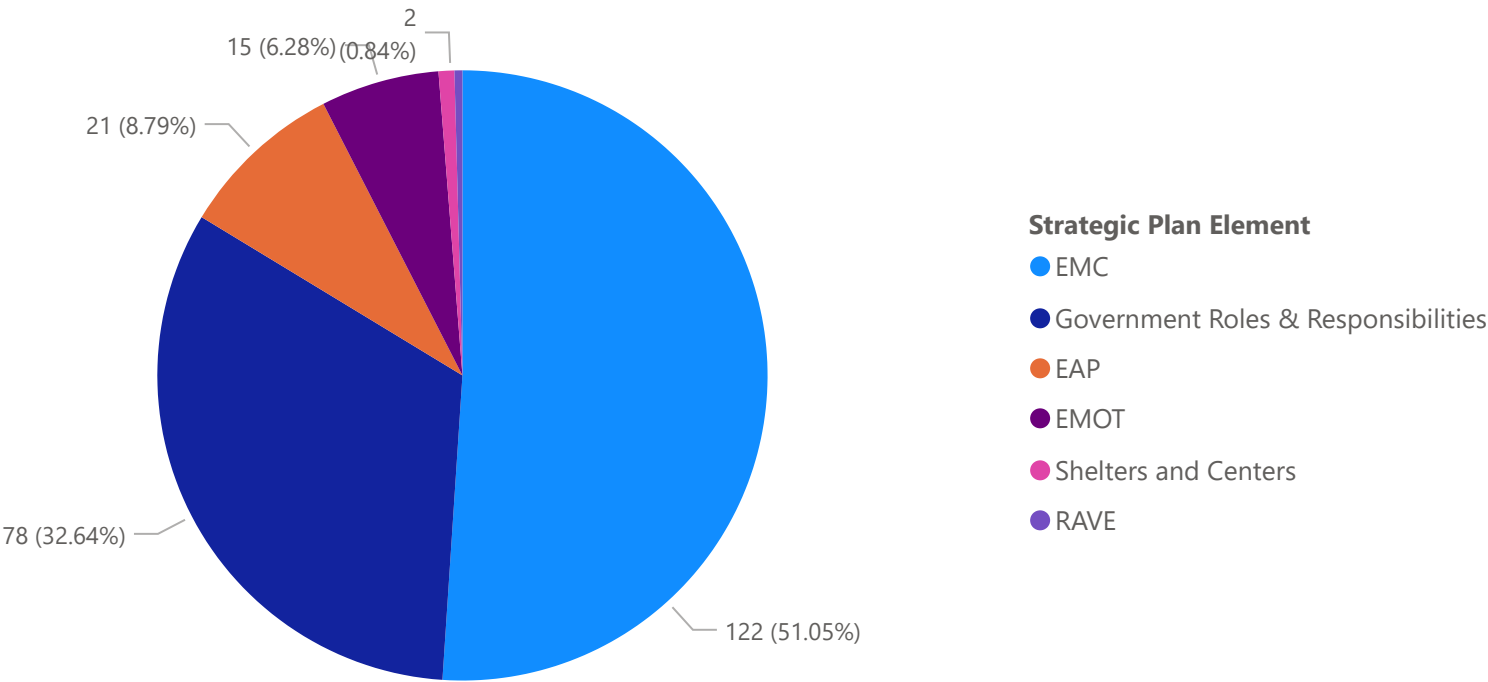
Emergency Management serves to aid, counsel, and assist the agencies and entities of the Oneida Nation that respond to emergencies or disasters that affect the Oneida Community and its members, through coordination of local and regional, police, fire, Emergency Management Services or rescue response when necessary.

Goal Number	Goal	Activity	Outputs
1	Develop emergency management capacity	Grant applications, budget and staffing request, training and succession plan, technology implementation	Emergency Management (EM) program, staffing model and succession plan is developed and adopted, technology resources are in place
2	Seasonal Review of Shelters and warming & cooling centers.	Vulnerability and needs analysis, meetings, reports and updates.	Locations identified and Departments trained.
3	Develop and implement Emergency Action Plans (EAP)	Vulnerability and needs analysis, meetings, reports and updates. Identify facility or event leads, EAP or EMP assessments, outreach and education, EAP and EMP documents	Funding agreements, staff commitments from Oneida divisions and departments. Number of buildings and events that have current and updated EAP
4	Emergency Management Operations Team	Identify qualified Team members from across the Oneida Nation organization to have lead roles in their area of expertise.	Letters of commitment, regulary scheduled meeting with agendas and minutes.
5	Expand the Capabilities of RAVE alert system	Needs analysis, technology acquisition and deployment, outreach and education.	Emergency notification system reaches intended audience

Kaylynn Biely – Director Emergency Management Department

Objectives and Metrics

Strategic Plan Element



Staff	Job Title	Number of Activities
Alaina Noll	SPEC-WATER RESOURCE	4
Anthony Kuchma	MGR-PROJECT	3
James Snitgen	MGR-ENVIRONMENTAL QUALITY	9
Jeremiah Pelky	SPEC-DATA-LEAF	3
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT	224
Michael Arce	SPEC-STORAGE TANK	4
Nathan Pelkey	SPEC-ENVR INVASIVE SPECIES	2
Tavia James-Charles	DEALER/FLOOR PERSON-DUAL RATE	89
Victoria Flowers	COORD-ENVIRONMENTAL COMPLIANCE	21
Wesley Johnson	MGR-SR PROJECT NONPOINT	4
Total		363

Kaylynn Biely – Director Emergency Management Department

Goal #1 Emergency Management Capacity

Strategic Plan Linkage															
Goal	Activity														
Emergency Management Operations Team	Identify qualified Team members from across the Oneida Nation organization to have lead roles in their area of expertise.														
	<table><tr><th>Activity</th><th>Count</th></tr><tr><td>BC Meeting</td><td>18</td></tr><tr><td>Budget and Finance Meeting</td><td>5</td></tr><tr><td>Emergency Management Team Meetings</td><td>30</td></tr><tr><td>Reporting</td><td>8</td></tr><tr><td>Training or Webinar</td><td>59</td></tr><tr><td>Total</td><td>120</td></tr></table>	Activity	Count	BC Meeting	18	Budget and Finance Meeting	5	Emergency Management Team Meetings	30	Reporting	8	Training or Webinar	59	Total	120
Activity	Count														
BC Meeting	18														
Budget and Finance Meeting	5														
Emergency Management Team Meetings	30														
Reporting	8														
Training or Webinar	59														
Total	120														

Highlights

- National Weather Service Briefing
- Legislative Operating Committee Meeting
- Individual Assistance and Public Assistance Status Updates
- Incident Support Model Workgroup
- Health Center Exercise with Public Health
- Hazardous Waste webinar
- General Tribal Council Meeting 2 pm start time
- G205 Training at Gaming Employee Services
- Flooding Check in
- FEMA Meeting/Briefing
- Environmental Protection Agency Webinars
- Emergency Operations Center Outagamie Briefing
- East Central Regional Meeting
- DHS and FEMA Webinars
- Developing EM FY2027 -2029 budget
- Continuity Program Workshop - Calumet County
- Center for Homeland Defense and Security

Employee	Job Title
Victoria Flowers	COORD-ENVIRONMENTAL COMPLIANCE
Tavia James-Charles	DEALER/FLOOR PERSON-DUAL RATE
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT
James Snitgen	MGR-ENVIRONMENTAL QUALITY

Kaylynn Biely – Director Emergency Management Department

Goal #2 Seasonal Review of Shelters and Warm and Cooling Shelters

Strategic Plan Linkage		
Goal	Activity	
Emergency Management Operations Team	Identify qualified Team members from across the Oneida Nation organization to have lead roles in their area of expertise.	
	Activity	Count
	Shelters and Centers	2
	Total	2

Activity	Comments
Discussion with DPW and Human Services about shelters	
Review shalter info provided during flooding disaster	

Employee	Job Title
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT

Kaylynn Biely – Director Emergency Management Department

Goal #3 Emergency Action Plan

Strategic Plan Linkage		
Goal	Activity	
Develop and implement Emergency Action Plans (EAP)	Vulnerability and needs analysis, meetings, reports and updates.	
	Identify facility or event leads, EAP or EMP assessments, outreach and education, EAP and EMP documents	
	Activity	Count of Activity
	Emergency Plan Modification or Update	8
	Pre-disaster Mitigation Planning	6
	Post-disaster Activities	5
	Disaster Response	2
	Total	21

Highlights

- Damage Assessment Reports
- Emergency Action Plan Review for Museum
- Emergency Plan Mitigation Update Meeting
- Information requests and gathering for Blizzard Elsa
- Pre disaster mitigaion meeting
- Pre-Disaster Mitigation Meeting
- Recovery - discussion with DPW and Grounds Keeping
- Review Emergency Closure SOP for gaming
- Review the draft for final updates - community comments
- Review the final draft of PDMP with included requested updates
- Summarize Information for Efforts Related to Emergency
- USDR information for Blizzard
- WDF Info into WEBEOC for Elsa
- WDNR Spills Data
- WEM WDF Webinar and discussion

Employee	Job Title
Victoria Flowers	COORD-ENVIRONMENTAL COMPLIANCE
Tavia James-Charles	DEALER/FLOOR PERSON-DUAL RATE
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT

Kaylynn Biely – Director Emergency Management Department

Goal #4 Emergency Management Operations Teams

Strategic Plan Linkage							
Goal	Activity						
Emergency Management Operations Team	Identify qualified Team members from across the Oneida Nation organization to have lead roles in their area of expertise.						
	<table><tr><th>Activity</th><th>Count of Activity</th></tr><tr><td>Interdepartmental Meeting</td><td>15</td></tr><tr><td>Total</td><td>15</td></tr></table>	Activity	Count of Activity	Interdepartmental Meeting	15	Total	15
Activity	Count of Activity						
Interdepartmental Meeting	15						
Total	15						
Project	Comments						
Pre-Disaster Flood Assessment Scope Discussion							
Safety meeting at Gaming Employee Services							
Pre-screen for Coordinator Position	Pre-screen 10 applicants for the EM Coordinator position with HRD						
ARC GIS Meeting	to discuss Survey 123						
National Weather Service Briefing	via google meet						
Dumpster Discussion	via teams						
Dumpster Meeting	via teams						
Flooding Check in	via teams						
Flooding Discussion Follow-Up	via teams						
GTC Logistic Prep and OBC Prep Meeting	via teams						
Pow wow health and safety meeting	via teams						
Staff Meeting to Gain Situational Awareness	via teams						
Volunteer Clean up	via teams						
Volunteer Meeting	via teams						

Employee	Job Title
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT
Tavia James-Charles	DEALER/FLOOR PERSON-DUAL RATE
Victoria Flowers	COORD-ENVIRONMENTAL COMPLIANCE

Kaylynn Biely – Director Emergency Management Department

Goal #5 RAVE Communication

Strategic Plan Linkage	
Goal	Activity
Expand the Capabilities of RAVE alert system	Needs analysis, technology acquisition and deployment, outreach and education.

Activity	Count of Activity
RAVE	1
Total	1

Project	Comments
Updates and review of current list permissions	

Employee	Job Title
Kaylynn Biely	DIR-EMERGENCY MANAGEMENT

Accept the Intergovernmental Affairs Director FY-2026 3rd quarter report

Business Committee Agenda Request

1. Meeting Date Requested: 08/12/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: *Choose or type justification.*

3. Requested Motion:

☐ Accept as information; OR

Accept the Intergovernmental Affairs Quarterly Report

4. Areas potentially impacted or affected by this request:

☐ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☐ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Melinda J. Danforth, Intergovernmental Affairs Director

Primary Requestor: (Name, Title/Entity)

Intergovernmental Affairs Quarterly Report

August 12, 2026

About Intergovernmental Affairs

Mission:

To promote the legal, legislative, and political agenda of the Oneida Nation at the local, state, and federal levels of government, and ensure that the Nation's funding agreements and compacts with federal agencies are negotiated to our Nation's benefit and protects our Nation's resources through analyzing federal legislation that may impact our Nation's resources, land, and people.

Purpose:

Legislative Affairs promotes the legal, legislative, and political agenda of the Oneida Nation at the local, state, and federal levels of government. Self-governance negotiates, oversees and ensures compliance of the Nation's Indian Self Determination and Education Assistance (ISDEAA) agreements with federal agencies, and promotes and educates about the benefits of Self Governance to expand and strengthen Self-governance authority.

PRIORITY/GOAL 1: Strengthen Government to Government Relations and Advocacy

PRIORITY/GOAL 2: Protect & Expand Self Governance, Sovereignty & Jurisdiction

PRIORITY/GOAL 3: Secure Sustainable Funding and Maximize Resources

Federal Update

Federal Budget Status

On April 3, 2026, the President released his Fiscal Year (FY) 2027 Budget Request to Congress. For the Indian Health Service (IHS), the Administration is requesting \$9.094 billion, a 13% increase of \$1.109 billion over the FY 2026 funding levels enacted by Congress. A large part of this increase comes from Contract Support Costs (CSCs) and 105(l) leases. The combined increase to IHS Services and Facilities is 5.8%, or \$342.9 million. On June 3, 2026, the House Appropriations Full Committee passed the Fiscal Year (FY) 2027 appropriations bill for Interior, Environment, and Related Agencies. The bill provides \$8.69 billion for IHS, including \$6.06 billion in advance appropriations for FY 2028.

The Administration is requesting \$1.8 billion for the Bureau of Indian Affairs, a \$714 million cut from the FY 2026 funding levels enacted by Congress. The House Fiscal Year (FY) 2027 appropriations bill for Interior, Environment, and Related Agencies provides \$3.21 billion for BIA.

The Administration is requesting \$933 million for the Bureau of Indian Education, a \$437 million cut from the FY 2026 funding levels enacted by Congress. The House Fiscal Year (FY) 2027 appropriations bill for Interior, Environment, and Related Agencies provides \$1.55 billion for BIE.

Line Item	FY26 Enacted	FY27 Tribal Request	FY27 President's Request	FY27 House Proposed
Indian Health Service	\$8.05 Billion	\$73 Billion	\$9.09 Billion	\$8.69 Billion
Bureau of Indian Affairs	\$2.49 Billion	\$38 Billion	\$1.8 Billion	\$3.21 Billion
Bureau of Indian Education	\$1.37 Billion	\$11 Billion	\$933 Million	\$1.55 Billion

[Sources: [President's FY 2027 Budget Proposes Significant Cuts to Indian Affairs Programs](#), [House Appropriations Committee Advances Labor Health and Human Services Spending Bill, Protects Key Indian Country Programs - NCUIH](#), [House and Senate Take Actions to Reject President's FY 2027 Proposed Cuts to Indian Affairs](#), [FINAL-FY27-PresBud-Analysis.pdf](#), [Tribal Interior Budget Council | NCAI](#)]

The federal government is currently funded through September 30, 2026. The House passed a continuing resolution along largely party lines before leaving for recess in July that would fund the government through December 4, 2026. The Senate is set to pass a bipartisan continuing resolution at the end of the week that would fund the government through December 11. The Senate version also includes a provision blocking the implementation of the proposed Office of Management & Budget rule that would politicize the grant making process and allow the federal government to unilaterally rescind grants that have already been awarded. Both continuing resolutions provide level funding for tribal programs.

National Mid-Term Election

Mid-term elections are held during the halfway point of each presidential administration and will occur this year with primaries on August 11, 2026, and General Election occurring on November 3, 2026. All members of the House of Representatives' seats and one-third of the Senate seats are up for election.

Of note,

- ❖ Senator Baldwin and Johnson are not up for election.
- ❖ Governor Evers (WI) will not seek reelection. A new Governor will be elected during the mid-terms and seated in January 2027.
- ❖ House of Representatives up for election in Wisconsin include:
 - o **District 1:** Bryan Steil (R)
 - o **District 2:** Mark Pocan (D)
 - o **District 3:** Derrick Van Orden (R)
 - o **District 4:** Gwen Moore (D)
 - o **District 5:** Scott Fitzgerald (R)
 - o **District 6:** Glenn Grothman (R)
 - o **District 7:** Tom Tiffany (R)
 - o **District 8:** Tony Wied (R)

As the Nation engages all candidates from a non-partisanship standpoint, it is important to continue to inform our voters on all candidates. Intergovernmental Affairs is actively executing a Get Out the Vote strategy that includes voter analysis, candidate engagement, and community awareness.

Federal Legislation (Top 4 Issues)

- ❖ Prediction Markets Legislation – ACTIVELY LOBBYING & MONITORING
- ❖ Farm, Food, and National Security Act of 2026 (aka Farm Bill) passed House – MONITORING
- ❖ OMB Overhaul of Grants
- ❖ Pell Grant

State Update

2025 – 2026 Legislative Session

The 2025-2026 State legislative session has concluded.

State/Tribal Consultations

Governor Tony Evers signed Executive Order #18, affirming the government-to-government relationship between Wisconsin and the state's 11 federally recognized Tribal Nations. The order mandates that cabinet agencies engage in meaningful consultation on policies impacting Tribes, update their consultation policies, and designate a tribal liaison.

Oneida Business Committee members and staff have attended all state/tribal consultation meetings.

Upcoming State/Tribal Consultations are listed below.

September Monday 15 & Tuesday 16	<u>Monday, September 15</u> 9:30 am Dept. of Health Services (DHS) <u>Tuesday, September 16</u> 8:15 am Dept. of Military Affairs (DMA) 10 am Dept. of Natural Resources (DNR)	Ho-Chunk	Wisconsin Dells Casino
October Tuesday 13 & Wednesday 14	<u>Tuesday, October 13</u> Dept. of Corrections (DOC) Dept. of Revenue (DOR) <u>Wednesday, October 14</u> Departments of Administration (DOA) Dept. of Ag, Trade, & Consumer Protection (DATCP)	Potawatomi	Milwaukee Casino

Local Update

- ❖ Intergovernmental Affairs continues to attend and/or monitor the local municipal government meetings and share information and/or advocate on issues impacting the Nation.
- ❖ Agreements:
 - Outagamie County Cooperative Governance Agreement – in final stage of negotiations. Agreement should be ready for the August 26th BC meeting for approval.
 - Town of Oneida Roads Agreement completed.
 - Reconstruction of Seminary, Old Seymour and Ranch Road will be complete by the first day of school.
- ❖ Neighborhood Association Events
 - Back to School Neighborhood Association event – Friday, August 14th at Ted Fritsch Park
 - Will include Ground Break for Splash Pad, with which the Nation contributed funding to.

Self-Governance

What is Tribal Self-Governance?

Tribally driven, legislative option that authorizes federally recognized Tribes to negotiate with federal agencies to assume funding and control over programs, functions, services, or activities (PFSAs), or portions thereof, that the federal government would otherwise provide.

The Nation has a Self-Governance compact and funding agreement with the Indian Health Service (IHS) for healthcare programs, and with the Department of the Interior for BIA programs, including law enforcement, environmental and natural resources, real estate services, social services, educational, governmental, and others.

Outcome/Goal #1: Secure Sustainable Funding and Maximize Resources

Pursue and secure recurring and one-time federal Self-Governance funding opportunities to enhance the Nation's programs and services.

Outcomes/Accomplishments:

- *New U.S. Department of the Interior 105(I) Leases:*
 - Self-Governance has negotiated and executed twelve (12) new 105(I) leases with the Department of the Interior (DOI) for the Nation. First lease payment of \$483,248.65 for FY23 was received by the Nation in April 2026.
 - Lease payments in the amount of \$3,346,716.11 for the same twelve (12) buildings for FY24 were received in July 2026.
 - 105(L) leases are not traditional leases. They are facility cost agreements between the federal government and a Federally Recognized Tribe to compensate the Nation for facility operational expenses. These expenses relate to the use of the facility to operate compacted Self-Governance Programs, Functions, Services, and Activities (PFSAs).

- o Self-Governance is meeting with DPW, Central Accounting, Self-Gov program staff, and facility managers to identify eligible facility projects and expenses. Funds will be budgeted in accordance with the Nation's Budget & Finance Law.
- o Self-Governance will continue to pursue 105(l) leases for all eligible facilities.
- *Negotiating Indian Health Service Contract (IHS) Support Costs and CDA Claims:*
 - o Contract Support Costs (CSC) are the necessary and reasonable costs associated with administering the compacts through which Tribes assume direct responsibility for IHS programs and services. Self-Governance is responsible for negotiating and reconciling CSC costs with the IHS and DOI to ensure the Nation is fairly reimbursed for these costs.
 - o Self-Governance along with assistance from the Oneida Law Office submitted a claim for FY19 in September 2025 in the amount of \$1.9 million. IHS continues to review the claim and sent Oneida a letter extending their review timeframe to January 2027.
 - o Self-Governance along with assistance from the Oneida Law Office submitted claims for FY20-FY24 for a total of \$17 million in July 2026.

Outcome/Goal #2: Protect & Expand Self Governance, Sovereignty & Jurisdiction

Support the expansion of Self-Governance and tribal sovereignty within federal agencies and fully exercise Self-Governance authority within the Oneida Nation.

Outcomes/Accomplishments:

- *DOI CY26 Funding Agreement Approved:*
 - o Self-Governance successfully negotiated CY26 Self-Governance Funding Agreement with the Department of the Interior, which adds the Nation's 477 Programs (Economic Support) and Tribal Courts. The new agreement was approved by the Business Committee on 3/27/26.
 - o Increases the Nation's sovereignty, reduces administrative burden, and the Nation's increases eligibility for federal funding for these programs.
- *USDA Food Distribution Self-Determination Demonstration Project:*
 - o The Nation is of 16 tribes participating in pilot project with USDA to expand Self-Governance to the USDA Food Distribution on Indian Reservations (FDPIR) Program.
 - o Through this project, the Nation has entered into agreements with USDA to provide our clients with Oneida Nation-produced bison, beef, and apples from Oneida Nation Farms, as well as fish from Red Cliff and wild rice from Red Lake.
 - o The current demonstration project is temporary and limited in scope. Tribal leaders and organizations are advocating permanent authorization and expansion of the program in the next Farm Bill.
 - o Oneida was approved for an additional \$673,088 extension through September 2028. We are awaiting contract documents from USDA.

Outcome/Goal #3: Strengthen Government to Government Relations and Advocacy

Collaborate with federal partners and tribal organizations to advance the Nation's priorities and serve as a resource to Oneida Nation's Self-Governance programs.

Outcomes/Accomplishments:

- *Federal Engagement:*
 - o Councilwoman Webster represented the Bemidji Area for the IHS TSGAC meeting in July 2026.
 - o Oneida participated in the DOI SGAC meeting held in July 2026 to gain information on the current issues at DOI.
 - o Councilwoman Webster represented the Bemidji Area at the ACF TAC meetings held on August 4th & 5th, 2026. Self-Governance assisted as technical experts.

Accept the Bay Bancorporation, Inc. FY-2026 3rd quarter report

Business Committee Agenda Request

1. Meeting Date Requested: 08/26/26

2. Session:

☒ Open ☐ Executive – must qualify under §107.4-1.

Justification: Proprietary - trade secrets/commercial/financial

3. Requested Motion:

☒ Accept as information; OR

Enter the requested motion related to this item.

4. Areas potentially impacted or affected by this request:

☐ Finance

☐ Programs/Services

☐ Law Office

☐ DTS

☐ Gaming/Retail

☒ Boards, Committees, or Commissions

☐ Other: *Describe*

5. Additional attendees needed for this request:

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

Name, Title/Entity OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: <i>Describe</i> | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: <i>Describe</i> | |

8. Submission:

Authorized Sponsor: Larry Barton, Treasurer

Primary Requestor: Jeff Bowman, President, Bay Bank



Bay Bank
QUARTERLY REPORT

Quarter ended June 30, 2026

A. BAY BANK

Submitted by: Jeff Bowman, Board Member
Directors: Fern Orie, Sam McMahon, Jeff Bowman, Joshua Cottrell
Todd Van Den Heuvel, Elaine Skenandore-Cornelius

Oneida Business Committee Contact: Larry Barton

B. MINUTES

None Submitted

ACTION TAKEN

No Tribal Policy changes.

D. FINANCIAL

Note that various financial reports

December 31, 2026, is Bay Bank's fiscal year end.

E. SPECIAL EVENTS AND TRAVEL

None

F. PERSONAL COMMENTS

Bay Bank account numbers as of June 30, 2026:

2,194	Checking Accounts
612	Business Checking Accounts

236	Money Market Accounts
1,498	Savings Accounts
210	Certificates of Deposit
96	Commercial Real Estate Loans
1,278	Residential Real Estate Loans
297	Business Loans
1,065	Consumer Loans
39	Oneida Small Business 2000 Loan Program Loans
707	Oneida HRIP Loans
7	Oneida SSBCI Loans
323	Other Tribal Loans

The Oneida Small Business Loan Program 2000 that is administered by Bay Bank started on May 1, 2002. As of this date over \$ 19.7 million in new loans have been made to over 170 new or growing Oneida tribal member owned businesses.

The Oneida HRIP loans total \$10.2 million as of June 30, 2026, and have been made to 707 customers.

The Section 184 mortgage loans serviced under FHLB MPF program totaled \$89.7 million on June 30, 2026. There are 721 loans in the program currently.

G. GOALS AND OBJECTIVES

2026 GOALS:

GOAL A: Bay Bank will strive to attain a minimum 0.85% Return on Assets for the year ending December 31, 2026. Return on Assets (ROA) is a common measurement of a bank’s profitability. This ratio informs you how well the bank is managing and investing the bank’s assets.

2026 ROA Goal	2026 YTD ROA Actual	2026 Peer Group Average
0.85 %	1.14%	1.15%

GOAL B: Bay Bank will strive to attain a minimum 8.50 % Return on Equity for the year ending December 31, 2026. Return on Equity (ROE) is the measurement of how well the bank is performing for its stockholder.

2026 ROE Goal	2026 YTD ROE Actual	2026 Peer Group Average
8.50 %	11.36%	12.21 %

Bay Bank had budgeted total loans for the quarter ending June 30, 2026, in the amount of \$ 125.1 million. Total loans on June 30, 2026, were \$ 133.9 million, an increase of \$ 8.8 million from budget. Loans increased \$ 10.6 million over the 12-month period ended June 30, 2026.

Bay Bank had budgeted total deposits for the quarter ended June 30, 2026, in the amount of \$ 245.9 million. Total deposits on June 30, 2026, were \$ 264.9 million, an increase of \$ 19.0 million over budget. Deposits increased \$ 4.7 million for the past twelve months, the result of decrease in money market deposit accounts.

H.

MEETINGS

Monthly meeting on the fourth Thursday of each month.

Financial Ratio Definitions

Acronym	Full Name	Definition
ROA	Return on Assets	Measures Profits as a percentage of total average assets
ROE	Return on Equity	Measures Profit as a percentage of shareholder's equity

Return on Assets example:

$$ROA = \text{Profit divided by Asset Size}$$

2025 Profit \$ 3,875,000

2025 Average Assets \$ 305,000,000

\$ 3,875,000 divided by \$305,000,000 = **1.27% Return on Assets Ratio**

Return on Equity example:

$$ROE = \text{Profit divided by Shareholder's Equity}$$

2025 Profit \$ 3,875,000

2025 Average Equity \$ 27,000,000

\$ 3,875,000 divided by \$ 27,000,000 = **14.3% Return on Equity Ratio**

Accept the Oneida ESC Group, LLC FY-2026 3rd quarter report

Business Committee Agenda Request

1. Meeting Date Requested: 8/26/26

2. Session:

☒

Open

☐

Executive – must qualify under §107.4-1.

Justification: Proprietary - trade secrets/commercial/financial

3. Requested Motion:

☒

Accept as information; OR

Enter the requested motion related to this item.

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☐

Gaming/Retail

☐

Boards, Committees, or Commissions

☒

Other: Oneida ESC Group

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: Describe | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☒ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: Justin Nishimoto, Economic Strategy Coordinator

Primary Requestor: Matt Kunstman, Interim CEO

Instructions:

- 1) Save a copy of this form for your records.
- 2) Print this form as a *.pdf OR print and scan this form in as *.pdf.
- 3) Attach a memo addressed to the Business Committee describing your request
- 4) E-mail this form and all supporting materials in a *.pdf file(s) to:
BC_Agenda_Requests@oneidanation.org
- 5) If you are submitting a resolution for adoption, please send the **Word** version of the resolution along with the Agenda Request file.
- 6) Please email BC_Agenda_Requests@oneidanation.org with any questions regarding this form.



Oneida ESC Group, LLC

3rd Quarter Report – FY26

August 2026

Interim President/CEO

Matt Kunstman

OESC Board of Managers

Amy Hacker, OESC Chairwoman

Cristina Danforth

Curtis Danforth

Stephanie Metoxen

Sidney White

Narrative Report

Oneida ESC Group Overview

Oneida ESC Group, LLC (OESC) was established in 2012 as the holding company for the Oneida Nation's federal contracting and commercial businesses. OESC supports government, commercial, industrial, and tribal customers across the United States through a portfolio of specialized operating companies.

Governance Update

A new Board of Managers was established in March 2026 to provide strategic oversight, strengthen governance, and support the long-term growth and sustainability of the organization.

Portfolio of Companies

OESC oversees 11 operating subsidiaries:

- [Oneida Total Integrated Enterprises \(OTIE\)](#)
- [Mission Support Services \(MS2\)](#)
- [General Mechanical Corporation \(GMC\)](#)
- [Sustainment & Restoration Services \(SRS\)](#)
- [Oneida Engineering Solutions \(OES\)](#)
- [Oneida Construction Services \(OCS\)](#)
- [Oneida Environmental \(OE\)](#)
- [LG2 Environmental Services \(LG2\)](#)
- [Oneida Professional Services \(OPS\)](#)
- [Oneida Technology Services \(OTS\)](#)
- [1822 Land and Development Company of Oneida \(1822\)](#)

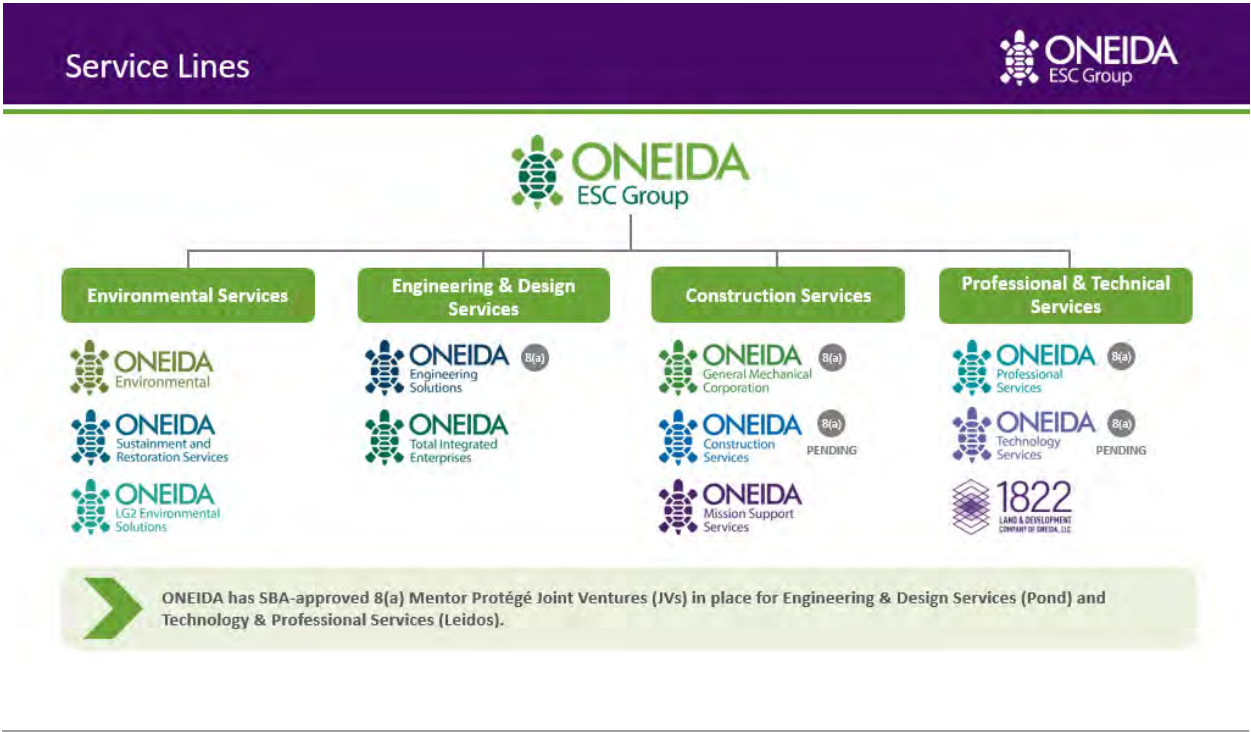
Shared Services & Support

OESC provides centralized support that allows its operating companies to focus on serving customers and growing their businesses. Shared services include:

- Accounting and financial management
- Contract administration and compliance
- Human resources and talent management

- Information technology support
- Corporate leadership and strategic planning
- Marketing, business development, and proposal support

OESC continues to strengthen its position as a diversified portfolio of businesses serving federal, commercial, and tribal markets. With a new Board of Managers in place and centralized support functions driving efficiency, the organization is well-positioned to pursue growth opportunities, expand capabilities, and create long-term value for the Oneida Nation.



A. Overview of Core Business Operations and Market Landscape

Subsidiary Company Overview

Oneida Total Integrated Enterprises (OTIE)

Competes in the open market as a small business and provides:

- Environmental services and remediation
- Engineering services
- Project management, general contracting, and construction
- Support for government and commercial clients

Mission Support Services (MS2)

Graduated from the U.S. Small Business Administration (SBA) 8(a) Business Development Program in March 2023.

Provides:

- Construction and construction management
- New construction and renovations
- Heating, Ventilation, and Air Conditioning (HVAC) systems
- Utilities, power generation, and distribution
- Communications and security systems
- Interior remodeling

Oneida Construction Services (OCS)

Provides construction management and self-perform construction services specializing in:

- Concrete work
- Framing
- Roofing and siding
- Finish carpentry

General Mechanical Corporation (GMC)

An HVAC-focused contractor that also performs:

- General contracting
- Electrical work

Entered the SBA 8(a) Program in November 2022.

Sustainment & Restoration Services (SRS)

Graduated from the SBA 8(a) Program in February 2024.

Provides:

- Environmental assessments
- Environmental remediation and restoration
- Wetlands and brownfields support
- Environmental Site Assessments (ESA)
- Asset inventories
- Environmental engineering
- Wastewater system services

LG2 Environmental Services (LG2)

Specializes in:

- Archaeological and cultural resource services
- Natural resource assessments
- Environmental compliance
- Site remediation
- National Environmental Policy Act (NEPA) documentation

Primary service area is the southeastern United States.

Oneida Professional Services (OPS)

Provides professional workforce solutions including:

- Training and education support
- Engineering and scientific expertise
- Software engineering support
- Technical staffing solutions

Oneida Engineering Solutions (OES)

Focuses on transportation infrastructure projects, including:

- Roadway design
- Bridge design
- Civil infrastructure engineering

Certified as:

- SBA 8(a) business
- Disadvantaged Business Enterprise (DBE) in Wisconsin

Oneida Environmental (OE)

Provides:

- Archaeological and cultural resource assessments
- Natural resource management services
- National Environmental Policy Act (NEPA) documentation
- Environmental planning support
- Removed from the Small Business Administration 8a Program on June of 2026 due to non-performance on the Immigrations and Customs Enforcement contracts

Oneida Technology Services (OTS)

Delivers:

- Information technology services
- Cybersecurity solutions
- Secure enterprise technology systems
- Support for highly regulated and complex environments

1822 Land and Development Company of Oneida (1822)

Owns and manages:

- Commercial properties
- Industrial properties
- Residential housing developments

Supports economic development for the Oneida Nation and Northeastern Wisconsin.

B. Alternative Overview of the Corporation's Current Market Position

OESC operates in a highly competitive Architecture, Engineering, and Construction (AEC) market.

Key Success Factors

- Strong past performance and customer satisfaction
- Competitive pricing
- Technical expertise and reputation
- Access to skilled employees and subject matter experts
- Geographic reach
- Long-term customer relationships

Strategic Competitive Advantage

OESC's diversified family of companies allows it to compete through:

- Traditional full-and-open procurements
- Federal small business programs
- Socioeconomic contracting programs

Strong Federal Customer Base

Three of the five largest federal agencies awarding non-competitive contracts are existing OESC customers. These relationships reflect OESC's technical capabilities, project execution, and successful performance history.

C. Strategy for Enhancing Market Value and Competitive Position

OESC continues to build upon long-standing customer relationships, strong past performance, and established contract vehicles.

Growth Strategy

- Expand core service areas where expertise already exists.
- Pursue strategic growth opportunities selectively.
- Leverage federal, tribal, state, local, and commercial relationships to generate repeat business.

Operational Flexibility

Multiple subsidiaries share overlapping North American Industry Classification System (NAICS) codes, creating flexibility when pursuing opportunities while maintaining accountability within each company.

Competitive Advantage

- Diverse portfolio of operating companies
- Ability to align the right company with customer needs
- Collaboration across subsidiaries while maintaining specialized expertise

OESC's growth strategy is centered on expanding existing strengths, deepening customer relationships, and leveraging the flexibility of its multi-company structure. This approach supports sustainable growth while maintaining disciplined pursuit of new opportunities.

D. Comparison of OESC's Performance and Position Relative to Key Competitors

OESC Competes Against

- Small businesses
- Alaska Native Corporation (ANC) companies
- Tribally owned businesses
- Native Hawaiian Organization (NHO) companies
- Other socioeconomic firms
- Large businesses in full-and-open procurements

Key Market Areas

- Environmental consulting and remediation
- Engineering and infrastructure services
- Construction management and facilities support
- Transportation engineering

Competitive Markets

- Environmental Services (NAICS 562910)
- Wisconsin Department of Transportation (WisDOT) projects
- Federal defense, environmental, and infrastructure contracts

OESC Competitive Advantages

- Diverse business portfolio
- Strong customer relationships
- Proven performance record
- Broad technical expertise
- Access to multiple procurement pathways

OESC successfully competes in a crowded marketplace by leveraging its diverse business portfolio, strong customer relationships, specialized expertise, and access to multiple contracting pathways. This flexibility enables OESC to pursue opportunities across federal, state, tribal, and commercial markets while maintaining a competitive position against both small and large contractors.

E. Summary of Recent Developments in the Market and Business Development

Federal contracting continues to face increased oversight and uncertainty.

Key Developments

- Increased scrutiny of the SBA 8(a) Program.
- More than 1,000 companies reportedly suspended from the 8(a) Program in January 2026.
- Department of Defense sole-source awards over \$20 million face increased review.

OESC Response

- OESC voluntarily withdrew Oneida Environmental from the SBA 8(a) Program to avoid potential impacts to the organization's other 8(a) companies. This was due to OESC/Oneida Nations decision not to pursue ICE contracts.

- OESC continues pursuing opportunities through its remaining subsidiaries and contract vehicles.
- The diversified structure allows flexibility as market conditions evolve.

Business Impact

- OESC anticipates a meaningful reduction in revenue because Oneida Environmental was one of the organization's strongest performing 8(a) companies.
- Management is actively pursuing mitigation strategies and replacement revenue opportunities.

While the federal contracting environment has become more challenging, OESC remains well-positioned due to its diversified portfolio of companies, strong customer relationships, and multiple contracting pathways. Management is focused on protecting long-term growth opportunities, maintaining compliance, and leveraging the broader OESC enterprise to navigate evolving market conditions.

F. Primary Goals, Targets, and Progress

Key Customers

- U.S. Department of Defense (DoD)
- U.S. Environmental Protection Agency (EPA)
- Bureau of Indian Affairs (BIA)
- Wisconsin Department of Transportation (WisDOT)
- Milwaukee Metropolitan Sewerage District (MMSD)
- Oneida Nation

Growth Priorities

- Expand services with existing customers.
- Enter new geographic markets.
- Pursue municipal opportunities.
- Grow relationships with Tribal Nations.
- Deliver integrated environmental, engineering, construction, technology, and professional services solutions.

OESC's growth strategy is focused on deepening relationships with existing customers while selectively expanding into new markets and regions. This balanced approach supports sustainable growth, strengthens customer partnerships, and creates long-term opportunities across federal, tribal, state, and municipal markets.

G. Key Drivers of Success and Associated Risks

Critical Success Factors

- Deliver consistent performance.
- Remain adaptable to changing conditions.
- Allocate resources strategically.
- Pursue disciplined growth.

Industry Challenges

- Increased competition
- Pricing pressure
- Delayed award timing
- Compliance requirements
- Talent recruitment and retention

FY26 Market Conditions

- Reduced procurement staffing
- Additional contract oversight
- Federal budget uncertainty
- Increased SBA review and approval timelines

Business Implications

- Slower opportunity flow
- Increased competition
- Longer pursuit cycles
- Greater pricing pressure

Despite a more challenging federal contracting environment, OESC remains focused on disciplined growth, operational excellence, and strategic positioning. The organization's diversified portfolio,

strong customer relationships, and ability to adapt to changing market conditions provide a solid foundation for long-term success.

H. Medium- and Long-Term Outlook and Sustainability

Overall Approach

OESC's long-term sustainability is built on:

- Delivering high-quality work
- Maintaining strong customer relationships
- Remaining diversified across customers, industries, and contract types

Medium-Term Priorities (2-5 Years)

- Grow existing customer relationships
- Expand complementary services
- Selective geographic expansion
- Invest in business development and talent
- Strengthen partnerships and joint ventures

Long-Term Priorities (5+ Years)

- Sustainable growth with core customers
- Flexibility to adapt to changing markets
- Competitive pricing and value
- Continued investment in reputation and partnerships

OESC's growth strategy is focused on sustainable, disciplined expansion. By strengthening existing customer relationships, investing in talented employees, leveraging strategic partnerships, and remaining adaptable to market changes, OESC is positioned for long-term success and continued value creation for the Oneida Nation.

I. Market Growth Trends and Key Sources of Expansion

Key Growth Opportunities

- Expanding work through competitive contract awards and established federal contract vehicles.
- Leveraging the strategic Oneida-Leidos partnership to access larger opportunities and new customers.
- Responding to increased demand from agencies seeking faster and more streamlined procurement solutions.
- Utilizing the advantages of tribal contracting programs to provide customers with efficient and flexible acquisition options.

Key Drivers of Growth

- Demand for engineering, construction, and professional services
- Expanding work through competitive contract awards and established federal contract vehicles.
- Leveraging the strategic Oneida-Leidos partnership to access larger opportunities and new customers.
- Responding to increased demand from agencies seeking faster and more streamlined procurement solutions.
- Utilizing the advantages of tribal contracting programs to provide customers with efficient and flexible acquisition options.

Current Market Position

Leaner

- Disciplined cost management
- Operational efficiency

Agile

- Rapid response to changing opportunities

Diversified

- Strategic partnerships with Leidos, Stantec, Pond & Company, and others

OESC's growth strategy is built on strong customer performance, trusted partnerships, and a diversified business model. By remaining agile, controlling costs, and leveraging strategic relationships, the organization is well-positioned to capitalize on future opportunities while navigating an increasingly competitive marketplace.

J. Summary of Corporate Assets

Workforce

OESC's workforce consists of 470 employees, including full-time, part-time, temporary employees, on-call staff, and interns.

Employees by Company

- OESC: 52
- OTIE: 65
- 1822: 2
- MS2: 12
- GMC: 14
- SRS: 81
- LG2: 27
- OES: 40
- OE: 55
- OPS: 115
- OCS: 7

Workforce Diversity & Experience

- 13 Native American employees
- 5 Native American Board Members (not included in employee count)
- 57 military veterans

Customer Base

- Approximately 85% of revenue comes from federal government customers.
- Remaining revenue comes from tribal, state, municipal, commercial, and industrial clients.

OESC maintains a workforce of nearly 500 employees supporting a diverse portfolio of businesses and customers. The organization benefits from experienced leadership, veteran talent, and strong federal customer relationships while continuing to support the Oneida Nation's economic development objectives.

K. Summary of Legal Actions

None.

Disclosure Report

(a) Board of Managers

Board of Managers

Name	Position	Appointed	Term Expires
Amy Hacker	Chairwoman	March 17, 2026	June 30, 2029
Cristina Danforth	Board Member	March 17, 2026	June 30, 2030
Curtis Danforth	Board Member	March 17, 2026	June 30, 2029
Stephanie Metoxen	Board Member	March 17, 2026	June 30, 2030
Sidney White	Board Member	March 17, 2026	June 30, 2031

Executive Leadership

Name	Position	Years with Company
Matt Kunstman	Interim President & Chief Executive Officer	17 Years

Leadership Focus

- Strong governance and oversight
- Sustainable growth
- Improved financial performance
- Operational excellence
- Long-term value creation for the Oneida Nation

With a newly appointed Board of Managers and experienced executive leadership, OESC is positioned to provide strong governance, disciplined growth, and strategic oversight as the organization continues to expand its portfolio of business and customer relationships.

Disclosure of Relationships and Joint Ventures

Independence & Governance

- No financial or family relationships exist between Board Members and executive management.
- No direct relationships exist between OESC leadership and Oneida Nation regulatory bodies or the Oneida Business Committee.

Strategic Joint Ventures

Oneida Total Integrated Enterprises (OTIE)

Majority Joint Ventures

- RS&H
- OCH
- Ahtna
- Environmental Restoration LLC (ERRG)
- Merrick

Equal

- PWT

Minority Joint Ventures

- Tetra Tech
- NDN

Mission Support Services (MS2)

Majority Joint Venture

- MEC

Sustainment & Restoration Services (SRS)

Majority Joint Ventures

- CAPE Environmental Management
- Environmental Restoration LLC (ERRG)
- RESTORE Federal Services (RFI)
- Battelle
- BB&E
- Alliant
- CAPE II

Minority Joint Venture

- Alliant-SRS

Oneida Engineering Solutions (OES)

Majority Joint Ventures

- Pond & Company
- Pond II

Oneida Environmental (OE)

Mentor-Protégé Partnership

- Stantec

Oneida Professional Services (OPS)

SBA 8(a) Joint Venture

- Leidos

Purpose of Joint Ventures

These partnerships help OESC:

- Pursue larger and more complex projects
- Expand technical capabilities

- Access new customers
- Increase competitiveness
- Support environmental, engineering, construction, technology, and professional services programs

OESC's network of strategic joint ventures and industry partnerships significantly expands the organization's reach, technical expertise, and business development opportunities. These relationships are an important component of OESC's long-term growth strategy and ability to compete for increasingly complex federal and state projects.

Accept the Oneida Golf Enterprise FY-2026 3rd quarter report

Business Committee Agenda Request

1. Meeting Date Requested: 8/26/26

2. Session:

☒

Open

☐

Executive – must qualify under §107.4-1.

Justification: Choose or type justification

3. Requested Motion:

☐

Accept as information; OR

Accept OGE 3rd Quarter Report

4. Areas potentially impacted or affected by this request:

☐

Finance

☐

Programs/Services

☐

Law Office

☐

DTS

☐

Gaming/Retail

☐

Boards, Committees, or Commissions

☐

Other:

5. Additional attendees needed for this request:

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

Enter (Name, Title/Entity) OR Choose from List

6. Supporting Documents:

- | | | |
|---|--|---|
| ☐ Bylaws | ☐ Fiscal Impact Statement | ☐ Presentation |
| ☐ Contract Document(s) | ☐ Law | ☒ Report |
| ☐ Correspondence | ☐ Legal Review | ☐ Resolution |
| ☐ Draft GTC Notice | ☐ Minutes | ☐ Rule (adoption packet) |
| ☐ Draft GTC Packet | ☐ MOU/MOA | ☐ Statement of Effect |
| ☐ E-poll results/back-up | ☐ Petition | ☐ Travel Documents |
| ☐ Other: Describe | | |

7. Budget Information:

- | | |
|---|--|
| ☐ Budgeted – Tribal Contribution | ☐ Budgeted – Grant Funded |
| ☐ Unbudgeted | ☐ Not Applicable |
| ☐ Other: Describe | |

8. Submission:

Authorized Sponsor: Justin Nishimoto, Economic Strategy Coordinator

Primary Requestor: (Name, Title/Entity)

THORNBERRY CREEK
AT ONEIDA

FY2026 Third Quarter Business Report

Oneida Golf Enterprise

June 30th, 2026

Golf & Related Operations*Business Practice, Market Overview, & Place within Market*

- Thornberry Creek remains well positioned as the premier destination golf course in Northeast Wisconsin
- As we continue to challenge status quo with new business practices, the initial public pushback dissipates over time
 - Removal of Sr. Rates on weekends
 - More conservative cart practices to protect course conditions
- Our position as a destination course within the region remains strong, evidenced by strong group bookings, especially on weekends
- We continue to push the envelope when it comes to daily public rates, topping \$90 ADR on weekends
- The Iroquois Course has baseline prices in line with most local courses, which drives play on all days

Strategies for Improved Value

- As we continue to plan on increasing rates, we explore new ways to provide value in line with high-end resort and public courses
 - In 2027, we will begin offering bottled water to all golfers, included in their round, as well as amenities boxes with ball markers and divot tools stationed on the course
- Increasing guest services will be paramount in providing a high-end experience e.g. bag drop services

Market Growth/Changes

- The local market remains consistent with previous years; the local area around Thornberry Creek continues to grow, especially to the south and west.
 - Our growth areas continue to be travelling groups; not to mean we will abandon local play, we just believe our value proposition is more well positioned to cater to those who play 1-3 times per year

Course & Grounds

- New practices, especially with regards to greens maintenance have received positive feedback from all golfers
- New efficiencies in mowing practices have allowed our staff to focus on detail work

Food & Beverage and Event Operations*Business Practice, Market Overview, & Place within Market*

- Food & Beverage satisfaction has increased YOY according to NPS surveys
- We continue to explore ways to drive traffic during winter months

Strategies for Improved Value

- Seasonal and daily specials drive traffic
- Passholder benefits have lead to increased satisfaction; many who bought passes only to golf have now tried the bar and restaurant offerings

Market Growth/Changes

- We have seen an influx of venue only options for weddings and events
 - We are exploring offering a hybrid model that will continue our full service offering while also allowing guests to bring in outside food from approved vendors for an increased room fee
 - Beverage options will remain available to all and provided in house