



# CHUKCHANSI GOLD RESORT & CASINO

REQUEST FOR PROPOSAL (RFP)

Title 31 Audit

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Chukchansi Gold Resort & Casino

711 Lucky Ln.

Coarsegold, California 93614

Phone: (559)692-5200

**RFP ID: February 27, 2024**

**Prepared By: Richard Royce**  
**Date: February 27, 2024**

REQUEST FOR PROPOSAL  
Title 31 Audit  
Coarsegold - California

**RFP ID:** February 27, 2024

**PROPOSAL SUBMISSION DEADLINE:** March 29, 2024, 5:00 PM

Questions may be submitted in written form to:

**Chief Financial Officer**

**Contact Name:** Michael Gorczynski  
**Contact Address:** 711 Lucky Lane  
Coarsegold, California 93614  
**Telephone Number:** (559) 692-5448  
**Email Address:** [michaelgorczynski@chukchansigold.com](mailto:michaelgorczynski@chukchansigold.com)

**BSA Compliance Officer**

**Contact Name:** Richard Royce  
**Contact Address:** 711 Lucky Lane  
Coarsegold, California 93614  
**Telephone Number:** (559) 692-5545  
**Email Address:** [richard.royce@chukchansigold.com](mailto:richard.royce@chukchansigold.com)

**INTRODUCTION**

Chukchansi Gold Resort & Casino is a large gaming facility, owned by the Picayune Rancheria of the Chukchansi Indians. The purpose of this RFP is to invite and welcome proposals to conduct our annual exterior Title 31 Audit. Please take the time to carefully read and become familiar with the proposal requirements. All proposals submitted for consideration must be received by the time specified above under the "PROPOSAL SUBMISSION DEADLINE."

*BIDDERS SHOULD NOTE THAT ANY AND ALL WORK INTENDED TO BE SUBCONTRACTED AS PART OF THE BID SUBMITTAL MUST BE ACCOMPANIED BY BACKGROUND MATERIALS AND REFERENCES FOR PROPOSED SUBCONTRACTOR(S) – NO EXCEPTIONS.*

## **PROJECT AND LOCATION**

The project associated with this RFP is or shall be located at 711 Lucky Ln, Coarsegold, California 93614.

## **PROJECT OBJECTIVE**

The objective and ultimate goal for this project is to find an external auditor with an exceptional knowledge base of FinCen's Title 31 rules and regulations to be able to determine if Chukchansi Gold Resort and Casino financial records are compliant with all of Title 31 rules and regulations.

## **PROJECT SCOPE AND SPECIFICATIONS**

The Project Scope and Specification are listed below but are not limited to:

### **1. AML Program Updates Review:**

- a. Compare updates to the Chukchansi Gold Resort & Casino AML Compliance Program to Title 31 rules and regulations to ascertain whether the criteria set forth in Title 31 were adequately addressed.

### **2. Training Material Review:**

- a. Compared updates to the Casino's AML Compliance training materials to Title 31 rules and regulations to ascertain whether the criteria set forth in Title 31 were adequately addressed.

### **3. Employee Comprehension and Training Records:**

- a. Select a sample of employees that handle cash transactions and / or performs duties related to the requirements of Title 31 and conduct an interview with them addressing Title 31 regulations, including suspicious activity reporting requirements.
- b. The employee departments to be interviewed include:
  - i. Cage
  - ii. Table Games
  - iii. Surveillance
  - iv. Security
  - v. Slots
  - vi. Players Club
  - vii. Compliance

### **4. Multiple Transaction Log (MTL):**

- a. Review all MTLs within the sample period to ensure all were completed in accordance with the Casino's AML Compliance Program, and FinCen guidelines.

### **5. Monetary Instrument Logs (MIL):**

- a. Review all MILs within the sample period to ensure all were completed in accordance with the Casino's AML Compliance Program, and FinCen guidelines.

### **6. Currency Transaction Reports:**

- a. Compare all transactions over \$10,000 as accumulated by the Casino’s Title 31 daily compliance personnel for the sample period and perform the following:
  - i. Observe that all CTR’s was completed with all available information (both critical and non-critical fields) by reviewing supporting documentation and available information in the patron management system.
  - ii. Observed that the CTR was completed and submitted to FinCEN within the reporting deadline.

**7. Suspicious Activity Reports:**

**a. Filing Decision Review:**

- i. Review suspicious activity notifications from the review period and review documentation for the decision to file or not file a SAR.
- ii. Review all for the reporting period for:
  - 1. Date the activity occurred
  - 2. Date the appropriate law enforcement was contacted
  - 3. Date the SAR was filed
  - 4. Name and / or description of the guest
  - 5. Patron address, social security number, and contact information, if available
  - 6. Type(s) of activity

**8. Know Your Customer (KYC) / Customer Due Diligence (CDD):**

- a. Due Diligence and KYC Reviews: Review all KYC’s for the sample period to see if all procedures were performed for the patrons in accordance with the AML Compliance Program.

**9. Audit any other Title 31 related information necessary to establish if Chukchansi Gold and Resort Casino is compliant with all Federal Title 31 guidelines.**

**SCHEDULED TIMELINE**

The following timeline has been established to ensure that our project objective is achieved; however, the following project timeline shall be subject to change when deemed necessary by management.

<b>MILESTONE</b>	<b>DATE</b>
Post RFP:	March 01, 2024
Proposal Submission Deadline:	March 29, 2024

Proposal Review & Selection:

April 1, 2024

Notify Participants by:

April 30, 2024

## **PROPOSAL BIDDING REQUIREMENTS**

### **PROJECT PROPOSAL EXPECTATIONS**

Chukchansi Gold Resort & Casino shall award the contract to the proposal that best accommodates the various project requirements. Chukchansi Gold Resort & Casino reserves the right to: (i) award any contract prior to the proposal deadline or prior to the receipt of all proposals, (ii) award the contract to more than one Bidder, and (iii) refuse any proposal or contract.

### **DEADLINE TO SUBMIT PROPOSAL**

All proposals must be received by Chukchansi Gold Resort & Casino no later than **5:00 PM on March 29, 2024** for consideration in the project proposal selection process.

### **PROPOSAL SELECTION CRITERIA**

Only those proposals received by the stated deadline will be considered. All proposals, submitted by the deadline, will be reviewed and evaluated based upon information provided in the submitted proposal. In addition, consideration will be given to cost and performance projections. Furthermore, the following criteria will be given considerable weight in the proposal selection process:

1. Proposals received by the stipulated deadline must be in the correct format.
2. Bidder's alleged performance effectiveness of their proposal's solution.
3. Bidder's performance history and alleged ability to timely deliver proposed services.
4. Bidder's ability to provide and deliver qualified personnel having the knowledge and skills required to effectively and efficiently execute proposed services.
5. Overall cost effectiveness of the proposal.

Chukchansi Gold Resort & Casino reserves the right to cancel, suspend, and/or discontinue any proposal at any time, without obligation or notice to the proposing bidder.

### **PROPOSAL SUBMISSION FORMAT**

The following is a list of information that the Bidder should include in their proposal submission:

#### **Summary of Bidder Background**

1. Bidder's Name(s)

2. Bidder's Address
3. Bidder's Contact Information (and preferred method of communication)
4. Legal Formation of Bidder (e.g. sole proprietor, partnership, corporation)
5. Date Bidder's Company was Formed
6. Description of Bidder's company in terms of size, range and types of services offered and clientele.
7. Bidder's principal officers (e.g. President, Chairman, Vice President(s), Secretary, Chief Operating Officer, Chief Financial Officer, General Managers) and length of time each officer has performed in his/her field of expertise.
8. Bidder's Federal Employee Identification Number (FEIN)
9. Evidence of legal authority to conduct business in California (e.g. business license number).
10. Evidence of established track record for providing services and/or deliverables that are the subject of this proposal.
11. Organization chart showing key personnel that would provide services to Chukchansi Gold Resort & Casino

### **Financial Information**

- State whether the Bidder or its parent company (if any) has ever filed for bankruptcy or any form of reorganization under the bankruptcy code.
- State whether the Bidder or its parent company (if any) has ever received any sanctions or is currently under investigation by any regulatory or governmental body.

### **Proposed Outcome**

- Summary of timeline and work to be completed.

### **Equipment or Service**

- List any and all equipment or services required for this proposed project and the number of each.
- Detailed estimated cost for each piece of equipment or service.
- List any equipment or services required of a subcontractor, along with a brief explanation.
- List any accommodation, services, or space required from Chukchansi Gold Resort & Casino, along with a brief explanation.

### **Cost Proposal Summary and Breakdown**

- A detailed list of any and all expected costs or expenses related to the proposed project.
- Summary and explanation of any other contributing expenses to the total cost.
- Brief summary of the total cost of the proposal.

### **Licensing and Bonding**

- Provide details of licenses and bonds (if any) for any proposed services that the bidder/contractor may plan on providing for this project.

**Insurance**

- Details of any liability or other insurance provided with regard to the staff or project.

**References**

- Provide 3 references

By submitting a proposal, Bidder agrees that Chukchansi Gold Resort & Casino may contact all submitted references to obtain any and all information regarding Bidder's performance.