

Florida Gaming Control Commission

Public Meeting

September 21, 2023

FLORIDA GAMING CONTROL COMMISSION
RULE DEVELOPMENT WORKSHOP

PRESENT:

Louis Trombetta, Executive Director
Florida Gaming Control Commission

Joseph Dillmore, Division Director
Division of Pari-Mutuel Wagering

Ross Marshman, Esquire, General Counsel
Florida Gaming Control Commission

Elizabeth Stinson, Esquire
Florida Gaming Control Commission

Dennis Chen, Miami-Dade County
Slot Operations Manager
Florida Gaming Control Commission

DATE: Thursday, September 21, 2023

TIME: 9:00 a.m. - 9:54 a.m.

PLACE: Florida Agency for Healthcare Administration
1400 West Commercial Boulevard
Fort Lauderdale, Florida 33309

Stenographically Reported by:
Thomas N. Sevier, RPR, FPR-C

Job No. 329010

1 Thereupon,
2 the following proceedings began at 9:00 a.m.:

3 MS. STINSON: Good morning. My name is
4 Elizabeth Stinson. I'm going to be the moderator
5 for this Rule Development Workshop pertaining to
6 cashless wagering and the rules in Chapter
7 75-14.001, 75-14.016, 75-14.022, 14.047, 14.054,
8 14.072, and 14.076.

9 With me at this workshop are Louis Trombetta,
10 the Executive Director of the Florida Gaming
11 Control Commission; Ross Marshman, the General
12 Counsel; Joe Dillmore, the Division Director for
13 the Division of Pari-Mutuel Wagering; and Dennis
14 Chen, Slot Operations Manager for Miami-Dade.

15 And first we're going to have opening remarks
16 by Executive Director Lou Trombetta.

17 MR. TROMBETTA: Thank you, everybody, for
18 coming here today. As was just said, this is a
19 Rule Workshop, kind of the first step in the
20 process of learning and going down the road of
21 cashless wagering in the state.

22 During COVID I know a lot of you reached out
23 to me personally and asked me about the ability to
24 use cashless at your facilities. You know, since
25 then we've had additional conversations. I see

1 Adam in the room. And, you know, Adam -- I've done
2 my job in trying to learn not just from Adam, from
3 other providers of cashless systems.

4 So I'm happy to see everybody here and realize
5 that this is something that means something to
6 you-all. The Commissioners are not here. But they
7 also wanted to be responsive to requests from the
8 industry.

9 This is a workshop, first step. We are here
10 to solicit input, get feedback, and really just
11 kind of hear about how you-all see this happening
12 and what you're actually expecting and asking the
13 State to authorize. Rule-making process is
14 somewhat lengthy or can be lengthy. We do not have
15 draft language at this time.

16 Our plan is to get feedback from you-all;
17 based on that feedback, kind of come up with some
18 type of draft; and, hopefully, move into the
19 proposed rule-making phase where we would actually
20 draft language; and then have another meeting,
21 essentially, and get feedback on that language.

22 And then only after that will it be adopted.
23 So we're still kind of far away. But we are
24 interested in feedback that we get. We have a
25 court reporter here today. Once I turn it over to

1 you, please be cognizant of the court reporter.

2 Any kind of acronyms that, you know, might be
3 common for the industry, it would help to kind of
4 say them in full. You should also identify
5 yourself before you begin speaking, name and who
6 you're representing or working with or why you're
7 here.

8 Additionally, we will be keeping the record
9 open for two weeks for anyone that wishes to submit
10 any type of documentation that they want us to
11 consider. So today is the 21st. I tell you what.
12 We'll keep it open until Friday the 6th.

13 Well, how about this? I can give you guys the
14 weekend too. Let's keep it open till October 9th,
15 Monday, October 9th. So that gives you a little
16 bit more than two weeks. Just give us anything you
17 can.

18 Okay. At this point I will turn it over to
19 public comments. So if anybody would like to
20 speak, let's just raise our hands and I'll try
21 to -- I'll just start with the first ones I see.

22 I'm sorry. If you can, do you mind just
23 standing up, so the court reporter and everybody
24 else can hear you.

25 MR. HIRSCH: Sure. My name is Mike Hirsch. I

1 work in product management for IGT. Thank you for
2 allowing us to be here.

3 I just wanted to mention that we have a number
4 of our cashless wagering solutions deployed in, you
5 know, several states, as well as internationally.
6 I just wanted to give a brief overview of how it
7 worked. We will be at G2E. And if you're out
8 there, I encourage you to visit our booth, and we
9 can give you a demonstration of how the cashless
10 wagering system works.

11 As you mentioned, there has been a lot of
12 interest since the pandemic in deploying these
13 solutions. And we've had a number of states, you
14 know, reach out, and other properties in states
15 that already authorized it deployed it.

16 But our solution is centered on people that
17 you know. So loyalty type, the player would have a
18 loyalty account. And when a player has a loyalty
19 account and wants to enroll in cashless, you know,
20 what the casino needs to do is verify that player,
21 know your customer.

22 KYC is what it's referred to in the industry.
23 That means just verifying that that player is who
24 they say they are; reviewing their driver's
25 license, their Social Security number, a number of

1 things like that to ensure, you know, to prevent
2 fraud.

3 Once the player has done this, the casino will
4 enable the player's cashless wagering account.
5 That's an account in our system that is within our
6 EZ Pay system, which is the ticketing system. They
7 have a wagering account there. And then the player
8 would now want to fund that account.

9 Now, of course, they can fund the account
10 using cash. But one of the, you know, purposes of
11 cashless is to allow the player not to have to
12 visit the casino with a bunch of cash for security
13 reasons. So they can fund it, use external funding
14 to fund that wagering account.

15 And at IGT, we have something called IGT Pay,
16 which is a gateway to payment service providers.
17 And then based on regulation and preference by the
18 operator, they can allow a number of different
19 external funding methods to fund that wagering
20 account.

21 It could be just a bank account. It could be
22 a debit card. It could be some e-wallet like
23 PayPal or Venmo. But once the player has funded
24 their account -- and they, you know, have to go
25 through the same type of fraud prevention when they

1 enroll these accounts.

2 But once that's all done, they fund their
3 account, that money goes to the cashless wagering
4 account. The player would go to the machine. They
5 have to either physically card in using their
6 player's card or if they've -- we publish a
7 software development kit, an SDK, that allows the
8 operator to incorporate a number of cashless
9 features into their mobile application.

10 So if they've done that, they can also card
11 into the game using their phone, because the
12 loyalty card is stored in the phone. Once they've
13 carded into the machine, there's a pin or one-time
14 pass code that has to be input to keep it secure.

15 They would then transfer the funds from the
16 cashless wagering account to the machine. That
17 money transfers in using the WAT in meters, their
18 wagering account transfer in meter. Those meters
19 are part of the SAS protocol, we think, since the
20 mid-2000s.

21 Once that money is on the machine, they would
22 play normally like any other type of, like if
23 they'd use any other funding method. Once they
24 cash out, they have money left over, that money
25 would then be transferred back to their wagering

1 account.

2 There's other options and it's configurable.
3 But the general flow is the money would go back to
4 their wagering account and would be available, you
5 know, if they wanted to play at a different
6 machine, et cetera.

7 One thing I neglected to mention, when the
8 player signs up, they also have the option of
9 setting daily deposit limits. So they can limit
10 how much money, if they want to prevent how much
11 money they can put into their wagering account on a
12 daily basis.

13 So that's a general overview. There's a whole
14 bunch of reports that we have for cashless wagering
15 to allow the auditing of the whole solution. And,
16 like I said, a number of states have already
17 implemented this and properties, you know, across
18 the country.

19 I'm here if you have any questions about the
20 solution. But I just wanted to let you know that
21 it is up and operating, and we'll be at G2E and
22 demo this.

23 MR. TROMBETTA: Thank you. If you can -- so
24 for anybody that offers solutions in the room,
25 including IGT, if you can submit any kind of

1 documentation or anything that we can read as part
2 of this process, it would be helpful.

3 And let me back up too before we go forward.
4 So where we are is that we are kind of assessing
5 the different solutions that are provided with the
6 balance of what's being asked from the permit
7 holders and operators in this room with the statute
8 and what kind of we are able to do.

9 So I'm going to turn it over to Ross -- Ross
10 Marshman is the General Counsel -- just to provide
11 a little more just on where we are in terms of kind
12 of language.

13 MR. MARSHMAN: Good morning. There are two
14 places in Chapter 551 that address an electronic
15 payment system. And in both instances, there is
16 seemingly a restriction against using a credit card
17 or a debit card as part of an electronic payment
18 system that is otherwise authorized.

19 So to the first speaker's point, you've
20 already brought up the idea of multiple external
21 funding sources. And just generally speaking, I
22 think everyone on the panel is aware of your
23 product's ability to be flexible with regulators in
24 multiple states. I think other products offer that
25 flexibility as well.

1 However, we are seeking any feedback anyone in
2 this room has today or, to Mr. Trombetta's point,
3 later, until that October date, regarding what sort
4 of solutions are out there that could work within
5 this framework that is seemingly not allowing
6 credit cards or debit cards; or if you have some
7 sort of electronic funds transfer system or if you
8 have some sort of close loop, open loop.

9 There is an ocean of financial terminology.
10 And if there is a way that you can provide any
11 information regarding that and tie that to your
12 solution or your proposed option that you would
13 like to explore in your facility, we would
14 appreciate that and review that. Thank you.

15 MR. TROMBETTA: And if I can add to that too.
16 You know, the reality of the situation, from our
17 view, is that the permit holders will go with a
18 solution type. You guys will end up having to be
19 licensed by the Gaming Commission.

20 But I just want to be clear for all the
21 operators in the room that whatever solution you go
22 with, the intent here isn't to like say here's the
23 solution you have to use. It would be here's the
24 framework for which your solution needs to fit. So
25 just so you guys have the flexibility.

1 Any other comments?

2 MR. CALABRO: Steve Calabro from Hialeah Park.

3 So as a permit holder or working for a permit
4 holder, the one thing I want to just put on the
5 record is that cashless -- I applaud the fact that
6 we're having the workshop and we're moving towards
7 some potential solution.

8 I just want it to be known that currently we
9 compete in a market with the Seminole Indians in
10 Broward and Dade. They have cashless. And they
11 have had it for a number of years. So this is --
12 also, I know you mentioned COVID. And that
13 certainly is the real deal why people were looking
14 into it.

15 But for us, it's a competitive thing. You
16 know, they have something that we don't have and
17 they're 5 miles down the road. So we lose
18 customers. So I just want that to be on the record
19 that that's why I think we should move forward to a
20 solution that is similar.

21 So that our customers, our customers that are
22 coming to the various pari-mutuel casinos
23 experience the same type of experience as if they
24 were to go the uku -- I mean, the -- I was going to
25 say ukulele or the guitar or whatever that is. So

1 if they go there or if they go to the, you know, to
2 Seminole Classic, you know, they have a cashless
3 experience.

4 And I think that we as pari-mutuel -- I'm
5 speaking for Hialeah Park, if any pari-mutuel
6 disagrees with me. We'd like -- I believe
7 everybody would like to have a similar solution.

8 That solution, also not just in the State of
9 Florida, is really all over the place in the
10 country. You know, Penn National is a pretty big
11 company, fourth largest, I think, third or fourth
12 largest gaming company in the United States. They
13 have full-on cashless in probably about 40 or 50 of
14 their locations.

15 So I just want you to know that it's great
16 that we're talking about it now and we're going to
17 work towards a solution. I understand what you
18 guys were saying about the current laws are a
19 little bit tricky with the credit card. But I want
20 to talk about that third.

21 The second thing is, what I would like to see
22 from a State approval is the full gamut of every
23 step. The cashless has multiple steps. You know,
24 the first step might be, you know, using a kiosk.
25 The customers come in and they use a kiosk and they

1 get a ticket and they go to the game. That would
2 be really Phase 1.

3 Phase 2 would be going to the slot machine,
4 using an app, and downloading funds from a source.
5 And Phase 3, to me, is being able to download the
6 funds to a slot machine and also to send them back
7 to your source that you downloaded from.

8 So I'd like to see the approval of all three.
9 When we're thinking about this, we need to think
10 about the whole concept. Because at Hialeah Park,
11 we might do Phase 1 for a year or two; but two
12 years from now we might go to Phase 2 and Phase 3.

13 The third thing and the final thing I want to
14 talk about is, when you talk about, as I understood
15 it -- maybe I heard it wrong -- but you can't use
16 credit cards and debit cards as a source. But the
17 pari-mutuels currently have cash advance ability.

18 So in the facility we are using customer's --
19 I'm just explaining the reality of what a customer
20 experiences. A customer walks in, doesn't have any
21 cash. Goes up to the cage, goes up to -- in our
22 case goes to the poker cage and does a credit card
23 or a debit card transaction to get cash, you know,
24 cash advance.

25 So in one instance, we sort of have that now

1 and we're just trying to make that cashless at the
2 slot machine. You know, I know that's not the
3 legal way to describe it. But right now we have it
4 in the building.

5 So we're just trying to move it to the 20, you
6 know, the 2023 version versus the 1990s version,
7 you know. 'Cause cash advance really was a thing
8 of the '80s and the '90s, you know. Now we're just
9 trying to bring it to the modern version.

10 So if there's anything -- that's basically
11 what I want to tell you, that we do have the
12 ability for our customers to access cash via credit
13 cards and debit cards through cash advance. And I
14 think almost every facility has that.

15 MR. TROMBETTA: Mr. Calabro, if I can, which
16 of those three, or maybe it's different, would be
17 similar to the one used by the Seminole Tribe that
18 you started with?

19 MR. CALABRO: So right now it would be the,
20 what I believe is the Number 2 Phase. So that
21 would be the phase where the customer could go to
22 the slot machine and be able to transfer funds from
23 a debit or a credit card.

24 But also, what I hear -- which is what I hear,
25 and it's rumor, so I got to be careful about that.

1 But they're also looking into being able to
2 transfer funds via e-check, which would be from
3 your checking account that currently you can do
4 through debit card and credit card.

5 What you can't do at the Seminoles at this
6 point in time, I believe you can't do two-way
7 transactions. So you can't send it back to that
8 source. I believe that. But you'd have to verify
9 me on that check. I'm almost sure it's Phase 2 is
10 the simple answer.

11 MR. TROMBETTA: Thank you. In the back.

12 MR. HARINTON: How you guys doing? My name is
13 Adam Harinton. I'm with Everi. First of all, I
14 know most of you. Mike, pretty good presentation
15 on the Wallet piece.

16 The one thing I want to capitalize on Steve's
17 point is that there are so many different
18 mechanisms to migrate to cashless. I think
19 everybody talks about this Grand Wallet and the
20 Wallet is the pie in the sky, is the ultimate goal.

21 There are very many different versions before
22 you get to that ultimate, we'll call it the apex.
23 I think there are quite a few offerings that Everi
24 offers. And there are offerings that other
25 providers offer as well.

1 But there are definitely -- I assimilate it to
2 the crawl, walk, run scenario with different
3 products that can offer that type of cashless
4 scenario. Because the one thing that, even though
5 Mike kind of talked down the path of it is, the one
6 thing that you operators can attest to is that the
7 cost of cash is increasing every year.

8 Like our cost of cash, I've been with Everi
9 almost eight years now, our cost of cash has nearly
10 gone from two to two and a half times what it was
11 when I first started on in 2016. So these are real
12 numbers. This isn't something that is just a nice
13 to have, a really nice feature.

14 The other point I want to make of it too is
15 having been a former marketer at one time or
16 another, it was very important for me, and one of
17 the questions I always faced was, how do I get my
18 rated play percentage, how do I get my rated play
19 percentage up.

20 Now, I know Hialeah Park may be a little bit
21 different place from a rated play percentage where
22 I used to work. However, I know that the ultimate
23 goal of an operator is to know your player. And
24 this is an organic way to know your player.
25 Because to Mike's point earlier, you cannot utilize

1 a Wallet on an unrated player. So you're learning
2 behaviors for all of these players.

3 And in reality -- and I think Mike and the
4 other providers in the room, if there are any,
5 would attest to this -- that we always, regardless
6 of whether there's funding business or there's
7 legit transaction going on with the Wallet, we can
8 always do the compliance reconciliation and
9 determination that those are real transactions, not
10 fraudulent transactions, quicker than we can with a
11 cash transaction.

12 So I think one of the misconceptions out there
13 about Wallet and this type of technology is that we
14 really don't, we don't know what the player does,
15 it's kind of secretive. It's all tracked, 'cause
16 it is a true rated player.

17 So like I say -- and then the last point I'll
18 say is, we will be at Group 1150 at G2E. I've
19 spoken with Lou and quite a few of you before. And
20 it's only gaining steam. It's gaining steam in
21 Las Vegas, it's gaining steam in Nevada, it's
22 gaining steam across the tribal lands too.

23 So look forward to talking to you guys, and
24 thank you for the opportunity.

25 MR. TROMBETTA: Thank you. Anyone else?

1 Yes, sir.

2 MR. LEIBOVITZ: Dana Leibovitz, Gulfstream
3 Park. We have cash advance as well. But it has to
4 be off the floor. Cash access has to be off the
5 floor.

6 With what we're talking about, is this ATMs
7 being on the floor as well, is that something
8 that's included? Because if we can't get cash
9 access on the floor, how do we do cashless on the
10 floor?

11 MR. TROMBETTA: And that's one of the things,
12 thank you, that we're trying to figure out. So, in
13 particular, 551.021, I believe, 021, sub 6 is --
14 no, sorry -- 551.121, sub 6 is really the one that
15 we're -- did I do it right or wrong? Okay. Is
16 really the one that we are kind of looking at in
17 terms of what is and isn't allowed.

18 The section has, I think, two or three
19 sentences. It starts, this is sort of how money
20 goes in, this is how money comes out, these things
21 are not allowed. And then the last sentence kind
22 of says, this type of system is allowed. We're
23 trying to figure out what that means.

24 So for any of the lawyers in the room, or if
25 you want to pass information on to anybody, that

1 would be helpful. Because the question that you
2 bring up is sort of, the ATM, we've looked at the
3 exact question, is how can this work with the
4 restrictions on ATMs.

5 You know, what is an ATM, what type of
6 transaction is clearly not or clearly not the same
7 type of a transaction as an ATM. So that's what
8 we're exploring and that's exactly what we're
9 trying to figure out. I don't have a great answer
10 for it right now.

11 MR. HARINTON: I have somewhat of an answer,
12 if you want to just --

13 MR. TROMBETTA: Sure. And just, if you don't
14 mind --

15 MR. HARINTON: I'll let him go.

16 MR. MORTON: Mine is procedural. If there's
17 something substantive, I'd rather them go ahead and
18 continue the substantive portion.

19 MR. TROMBETTA: And if you just could
20 recognize yourself before you comment too.

21 MR. HARINTON: Adam Harinton, Everi again.

22 So to the point of accessing of cash, in the
23 Wallet scenario -- and one of the things that we
24 have to be cognizant of as we go through this
25 journey and we understand the education of it, if

1 you do a Wallet like transaction -- and I'm going
2 to utilize my product, because that's what I know.

3 So if you utilize a Wallet transaction, that
4 transaction that occurs on the floor, those dollars
5 or those gaming dollars that have been established
6 through a Wallet could have already been transacted
7 on. So that transaction could have occurred when
8 that person was sitting on their couch or sitting
9 in their car before they even walked in the
10 property.

11 Once that transaction is completed, if that
12 money is within their Wallet or the property
13 Wallet, we'll call it, you're just accessing those
14 funds. You're not -- you don't necessarily have to
15 be transacting at the gaming location on the floor.

16 So it is clear as mud, I'll use the acronym,
17 because you really don't know when that transaction
18 occurs. And it's really difficult -- it just could
19 be the accessing of those external funds are there.
20 It's like walking in with cash in your pocket or
21 walking in with cash on a technological device that
22 you're able to access.

23 So it's the accessing of funds. It doesn't
24 necessarily mean that transaction is, essentially,
25 occurring on the floor. And it's really hard to

1 determine that unless you put other geofence type
2 scenarios in there.

3 MR. TROMBETTA: Okay. Thank you.

4 MR. DILLMORE: Could I ask a question on that,
5 Mr. Harinton? You just touched on that. I was
6 about to ask.

7 Is it possible to put a geofence on that type
8 of a solution where those transactions would occur
9 on the gaming floor?

10 MR. HARINTON: I believe it is possible to
11 geofence the technology stack that we offer. I
12 can't speak to others. But I believe it is
13 possible to put a geofence that says, hey, I'm
14 outside of this strategic area, we'll call it, that
15 transaction cannot be occurring.

16 Remember, generally in Wallet scenarios too --
17 I'm talking about my -- we're an agnostic provider.
18 So we would have to partner with some sort of slot
19 system. So it's generally a three party thing.
20 But, to my knowledge, there is the ability to put a
21 geofence on a location to restrict things within a
22 technology stack in general.

23 MR. DILLMORE: Thank you.

24 MR. TROMBETTA: Thank you. Anybody else?

25 MR. MORTON: T.J. Morton with the Lockwood Law

1 Firm.

2 Just on the question of what is allowed in
3 terms of electronic payment systems or electronic
4 credit systems, the statute is vague. But if you
5 go to the legislative history from 2005, there's a
6 sentence that says this provision does not preclude
7 the use of electronic credit systems, for example,
8 player cards, et cetera for making wagers and
9 issuing payouts.

10 So I think it was contemplated that there's
11 going to be, player cards can be used to make
12 wagers and receive payouts. That's from 2005.
13 Technology has changed a little bit. So maybe not
14 a player card, but maybe, you know. But it was
15 contemplated when they drafted the statute. And we
16 can -- and we'll provide, you know, further written
17 comments.

18 MR. TROMBETTA: Thank you. I think that would
19 be appreciated.

20 MR. CALABRO: I just have a question about --

21 MR. TROMBETTA: Could you identify yourself?

22 MR. CALABRO: Steve Calabro from Hialeah Park.

23 So as I listen to this, I would think that it
24 would be -- and I don't want to muddy the water.
25 But there's very similar -- when you are

1 downloading, when a customer is downloading funds
2 from their credit card to their property app -- you
3 know, it would be like a Hialeah Park app. And in
4 that app would be the app that has -- it's
5 basically a skim on IGT or Everi, right.

6 If you're doing that in your living room in
7 Downtown Miami, you're not really -- wouldn't that
8 help in getting through the legal aspects of it,
9 because it's not really occurring in the casino.
10 You're merely downloading it in some other
11 location.

12 And you're bringing it to the casino, the
13 phone, and then you're just transferring it from
14 your phone to the slot machine. In other words,
15 it's like there's no -- you're not on the casino
16 floor.

17 You can look at it two different ways, you
18 know. Like if I'm doing -- and the thing that I
19 want to bring up is that's how mobile sports
20 betting is really occurring and is going to occur,
21 when it does occur, in the State of Florida.

22 You're going to be sitting in your living room
23 in Downtown Miami. You're going to download from
24 your credit card to the app. And then you're going
25 to make -- well, then you're going to make a wager.

1 So the same process, the first part of the process
2 is downloading from a credit card to your mobile
3 device. That has been upheld in a lot of courts so
4 far as it relates to sports betting.

5 So what I hear is if you can download -- if a
6 customer can download a hundred bucks from a credit
7 card to my phone to make a sports bet, which they
8 will be soon in Florida, why can't they download a
9 hundred bucks to an app that is either IGT's or
10 Everi's cashless app, bring that phone to the
11 casino, and transfer the funds in. You know,
12 there's no cash transaction happening on the casino
13 floor.

14 MR. TROMBETTA: Thank you for that. I mean,
15 really, thank you for the comment. It's something
16 that we, you know, need to take into account.

17 Yes.

18 MR. HIRSCH: Mike Hirsch, IGT.

19 Looking at Number 6, it starts out with a slot
20 machine located. So it's talking about the slot
21 machine itself. And I just want to emphasize that,
22 you know, when you're funding your cashless
23 wagering account, you're not funding the slot
24 machine.

25 You're funding a wagering account. And then

1 the wagering account, you then transfer that money
2 to the slot machine, which is cash. You know, once
3 the money is in your wagering account, it's cash,
4 cash equivalent. So, I mean, I guess I don't see
5 the issue.

6 Obviously, the lawyers can work it out. But
7 it seems to me that what they were trying to say is
8 you can't hook up some device to stick a debit card
9 into a machine or a credit card into the machine
10 and transfer money directly that way. So I just
11 wanted to emphasize that.

12 MR. TROMBETTA: Thank you. Again,
13 procedurally, I'm trying to go for the people that
14 have the bring brains over here.

15 Did you have a comment, sir?

16 MR. SCHLAFFER: Yes. Paul Schlaffer with
17 Hialeah Park.

18 So we all know that there's a prohibition
19 against, you know, the credit cards, debit cards,
20 ATMs on the gaming floor. One possible solution
21 would be to leave those excluded, you know, and
22 then we just do ACH transactions.

23 We're all comfortable with doing, you know,
24 transactions between our bank accounts, 401(k),
25 et cetera, et cetera. So that could be a way

1 around that portion of the statute.

2 MR. TROMBETTA: Okay. Thank you.

3 MR. ZACHEM: Jon Zachem and I'm representing
4 PPI. A couple questions. And I want to make sure
5 I understood, from the beginning that I understood
6 how you guys were going forward.

7 You've got a workshop today. You're planning
8 on doing proposed language. And then are you
9 planning on another workshop, or are you going
10 straight to hearing then?

11 MR. TROMBETTA: We're not sure yet, frankly.
12 We're going to leave it open depending on how this
13 that went. You know, I think we can -- we have
14 options on this in what we do. So I don't want to
15 tie us to one way or the other.

16 But the other part of this is that the
17 Commissioners are going to review the transcript.
18 You know, they're not here. But they're also very
19 interested in what we're doing, and they're going
20 to also have input on the process. But the goal is
21 to move forward as expeditiously as we can on this,
22 you know.

23 But it might -- realizing that it covers a few
24 areas that just take a little bit of time on, you
25 know, the Gaming Commission's end that it might

1 take a little bit. And we're not sure yet if we're
2 going to jump right to the next phase, or if we
3 might have another workshop depending on sort of
4 where it goes.

5 MR. ZACHEM: Okay. Was there -- I know you
6 guys are trying to get educated on some of these
7 subject matters. Was there information provided
8 prior to this point that instigated this?

9 This wasn't done by petition. So there had to
10 have been some information conveyed to you. Is
11 there anything we can look at, so we can see where
12 the Commission is starting off at?

13 MR. TROMBETTA: Nothing -- so, I mean,
14 we've -- the Commission, you know, throughout years
15 has received records about cashless and, you know,
16 e-mails and stuff. So I'm not -- I don't want to
17 publicly say we don't have records pertaining to
18 cashless. We do.

19 MR. ZACHEM: That was not where I was going or
20 talking about.

21 MR. TROMBETTA: But this meeting was initiated
22 through interest by the Commission, internal
23 discussions. And, you know, there's been comments
24 made at Commission meetings about the desire to go
25 down this area. And then the Commission was

1 responding to that.

2 MR. ZACHEM: Okay. And last question. The
3 way that -- and Mr. Marshman put it out there
4 pretty clearly. I read Subsection 6 as being a
5 pretty decent hurdle. I get we're kind of trying
6 to make a statute that was created prior to
7 technological advances being in place work for
8 this.

9 Are you foreseeing comments being two-pronged,
10 one to address some of the legal elements on how we
11 might end up dealing with that hurdle, and the
12 other one being how do we end up addressing
13 functionally the permit holders are going to put it
14 in play or what they're looking at? Is that what
15 your -- is that what the Commission wants?

16 MR. TROMBETTA: Yes, we're looking for both.
17 We're looking from the -- let me start on the
18 second one. So from the functionality and from the
19 actual end user experience that you guys are trying
20 to provide, we're trying to figure out how that
21 looks and how it works.

22 Because, you know, honestly, it's an area that
23 we're just not that familiar with. So we're trying
24 to learn about it. You know, I think -- I will be
25 at G2E. I plan to reach out to everybody that

1 wants to offer any type of help on this issue
2 about, you know, how this works. I think we'll
3 consider that.

4 We're also -- you know, it's going to help us
5 get an idea of what you guys are trying to go. But
6 we are also, you know, looking at the legal limits
7 on what we can and can't do.

8 You know, we don't want to -- the Commission
9 doesn't want to be in a position where we, you
10 know, offer up, hey, you guys can do all this stuff
11 if the statute is more restrictive than what you're
12 trying to get to. So we're trying to get -- we're
13 trying to kind of put those two things together.
14 And we need both ends really to draft a rule.

15 MR. ZACHEM: That was it. Thank you.

16 MR. TROMBETTA: And to that end, we are
17 interested in submissions about either of them. If
18 there's something that you're trying to get to, you
19 know, this is the vision, this is what we'd like to
20 be able to offer at our facility. But we are also
21 interested in thoughts on how we overcome the
22 obstacle in the statute.

23 The other one is also in the definition of
24 slot machine in 551. It just also talks about the
25 use of credit and debit, I believe, in the

1 language. So we're trying to figure out how to
2 make it all work. But I think there is a desire
3 and intent from the Commissioners, from myself to
4 be responsive to the industry in this area, if we
5 can.

6 MR. MARSHMAN: If I may, just as a break, if
7 any person provides a comment, just know that
8 that's going to be a public record and publicly
9 available to anyone who typically asks for it;
10 unless you take a certain step to transmit
11 information to us and mark it as trade secret or
12 otherwise confidential or exempt from Florida's
13 public record laws.

14 Just expect everything you send us, unless you
15 take an affirmative step or communicate with us
16 prior to it to ensure that you're complying with
17 Florida law to mark whatever you're sending us as
18 confidential, it's going to be out there. So
19 please keep that in mind.

20 MR. CALABRO: Steve Calabro, Hialeah Park.

21 I just want to piggyback on Paul Schlaffer's
22 suggestion of using what I would call -- he said
23 ACH. I call it e-check, right. So that would save
24 you using e-check. You don't have to worry about
25 credit card or debit card issues, right. You're

1 just going e-check.

2 I also believe that you could also say --
3 okay. This is just a bizarre sort of a
4 brainstorming idea. Instead of credit card and
5 debit card, since there's a little bit of a gray
6 area of the law or a tough area of the law, it's
7 not just e-check, but maybe other cash apps like
8 PayPal or Venmo or Cash App. So you're not using a
9 credit card. You're using the app to transfer the
10 funds. That's point one.

11 Point two, and I just have to ask this
12 question. This is a crazy question. The law says
13 you can't use credit card and debit card. Could
14 the Florida Gaming Control Commission petition to
15 the lawmakers -- and maybe you don't want to do
16 this, 'cause it would take too long and it would be
17 like too difficult to occur -- to change the law?

18 Like the law was written in 2005. Technology
19 has changed significantly, particularly as it
20 relates to this topic. Can we just amend the law
21 so to allow for cashless? Now, there might be
22 lawyers and people from Tallahassee saying, Steve,
23 you're nuts, that's going to take 10 years to get
24 something done.

25 But that's another -- I just want to make it

1 out there, it seems to me, it seems logical. But
2 then when you think about it in reality, it might
3 get muddied in the politician world and the
4 legislative world and, you know, not be possible.
5 But it's another possibility.

6 MR. TROMBETTA: And I don't have an answer to
7 that question.

8 MR. CALABRO: Because you're not supposed to.

9 MR. TROMBETTA: Absolutely.

10 MR. LEIBOVITZ: Dana Leibovitz, Gulfstream
11 Park. To piggyback on Steve, I mean, everything
12 we're talking about is not exactly customer
13 friendly right now; because of exactly what we
14 said, because of the way the law is stated. And it
15 definitely puts us at a disadvantage to, as he
16 said, the ukulele up the road.

17 Yeah, there's lots of things, like Adam said,
18 that we can sit on the couch and download. Our
19 customers are on the property. That's where they
20 want the money. We can do all this. But I'm not
21 sure this actually advances us to where we need to
22 be to compete.

23 MR. TROMBETTA: Just, if you can, give us an
24 idea of where you envision your need to be. Again,
25 going back, if we can -- we're trying to figure out

1 what the goal is and then try to see if we can, you
2 know, what make this work.

3 Yes.

4 MR. HARINTON: Adam Harinton again.

5 One thing I would like to call out to the
6 Commission and to the other parties here is, I
7 don't know how many of you have been to a sporting
8 event or another entertainment venue; say, for
9 instance, a hockey game, a baseball game, I was in
10 Austin, Texas two weeks ago at a soccer game, you
11 go to a concert.

12 These venues are now cashless. There is no
13 cash at these venues anymore, these entertainment
14 venues. And I think it's efficiency. So to Dana's
15 point, I think it's an efficiency piece to get
16 their customers through the line, through the
17 breaks, to get them processed as quick as possible.

18 And then secondarily, I'm going to go back to
19 my prior point. Cash handling for these big places
20 that, to give out these, to have a DNI window, an
21 arcade in a casino environment, or to have a window
22 where you have all these servers or all these front
23 line personnel that are working food and beverage
24 or retail, it takes a lot more resources for a
25 cashless enterprise than for a non-cashless

1 enterprise.

2 Do I ever think that the casino industry or a
3 certain property is going to be a hundred percent
4 cashless? Probably not. But the reality of it is
5 is when you see the efficiencies that are created
6 from a point of sale transaction or a credit
7 transaction when it's the credential -- and then
8 it's also a security standpoint too.

9 I've seen issues where you go to a facility
10 and you go to a -- and that person that's
11 transacting with you or making your beverage or
12 selling you a shirt, they're never touching your
13 card.

14 So your card is never leaving your sight.
15 You're touching your card, it stays in your hand,
16 it goes back in your wallet. You get the service
17 that you're paying for and you move forward, and
18 your transaction is that much quicker.

19 So my point to the Commission, I think it's
20 also a viable solution and a proposal to go look at
21 other entertainment sources that are out there;
22 football, baseball, concerts, so on and so forth.
23 Very many of these, especially in these higher
24 concentration population areas, are going cashless.
25 Thank you.

1 MR. TROMBETTA: Thank you. Last -- well, not
2 last. It might be last. Anybody have any
3 comments?

4 MR. DILLMORE: Can I ask you a question, a
5 follow-up, please. You had mentioned, especially
6 Hialeah Park folks, about an e-check. I'm familiar
7 with the other transactions we talked about.
8 That's a little bit new to me.

9 But how does that transaction work, do you
10 know or is that something you can supply later in
11 detail?

12 MR. SCHLAFFER: Basically, you would put in
13 your routing and account number for your checking
14 account, so then you can transfer funds from one
15 account to another.

16 So in concept, this would be transferring
17 funds from a checking account to a gaming account
18 that would be able to be used in one of these
19 phases that we discussed, whether it's at the
20 kiosk, at the machine, et cetera.

21 MR. CALABRO: And, Joe, to add to that, so I
22 pay a lot of my utilities through an e-check.
23 That's what I do. I do exactly what Paul just
24 said. I'm sorry. I'm Steve Calabro from Hialeah
25 Park. You kind of figured that out.

1 And so you're just using an e-check. And just
2 during the -- from a standpoint of what we're
3 talking about here, you would during the
4 registration process. So when the customer is
5 downloading the app, they would register the
6 routing number and the account number that would be
7 the account being used to transfer funds.

8 So it would be a one-time setup in the
9 registration, and that would include the routing
10 and account number. And then when the customer
11 would go to the casino, he or she would have the
12 cell device and transfer the funds from that app to
13 the machine.

14 MR. DILLMORE: Okay. Thank you.

15 MR. TROMBETTA: Anybody else, anybody?
16 Question.

17 MR. HARINTON: In a scenario like that -- and
18 I'll let Michael buy in, if he can -- in a scenario
19 like that, that player would have to be
20 preregistered in the check cashing program.

21 So that player -- Steve Calabro, utilizing
22 that example, would be preregistered in the check
23 cashing program. He would be a known player. So
24 then since he's registered in that check cashing
25 program, he already has an established line per se,

1 a check cashing line. And then that e-check just,
2 essentially, turns into the same check cashing line
3 that he can access through his mobile platform.

4 Okay. Thank you.

5 MR. TROMBETTA: Thank you.

6 MR. CALABRO: I have one more thing that I
7 want to add. Steve Calabro.

8 I think what Adam said earlier, the regulators
9 really need to take heed on. This is all -- as a
10 regulator, as investigators that work for the FGCC,
11 I would think you would embrace this at the highest
12 level, because it's all tracked.

13 It's not -- you know, it's not like there's,
14 somebody's got cash in their back pocket and they
15 took it out of their, you know, out of their attic
16 or something like that. This is all traceable
17 transactions. You know, it actually cleans up the
18 whole process at a high degree.

19 And Adam mentioned that about 20 minutes ago.
20 And I think that's something that could be a
21 selling point in how you, if you have to sell this
22 to the Commission. You know, it is -- it makes
23 sure that every transaction that occurs in this
24 format, in this cashless environment is traceable;
25 so that if there's any kind of investigation that

1 needs to occur, it's quite simple.

2 You know, when you're investigating -- ask any
3 of the FGCC investigators. You're investigating
4 cash transactions. Real tough. It's real tough,
5 because you don't know where that cash is coming
6 from, you have to figure out that.

7 This is all on report. You push a button, you
8 get a report, you know exactly what occurred with
9 that individual. So it actually helps from a
10 regulatory standpoint, from a tracking standpoint.

11 MR. TROMBETTA: One of the questions that
12 comes up is anti-money laundering stuff too. So
13 how does this -- from what I understand, it varies
14 based on the provider and the arrangement the
15 provider has with the operator.

16 But who's responsible for anti-money
17 laundering, you know, monitoring and notification?

18 MR. CALABRO: We are as providers. And he can
19 explain it. I mean, Adam can explain it.

20 MR. HARINTON: So, in my opinion -- Adam
21 Harinton.

22 In my opinion, it's still -- the onus doesn't
23 change from a compliance perspective regarding the
24 transaction. So the transaction and the onus on
25 the compliance portion of that transaction would

1 still fall on the regulator. I am just -- Everi
2 would just act as the processor of that
3 transaction. It's not on the regulator, on the
4 property. Excuse me.

5 MR. CALABRO: The property, yeah.

6 MR. HARINTON: So the onus doesn't change.
7 What it enables you to do, it enables the
8 property's compliance process to shrink. Because
9 the player is rated, you know the source of funds,
10 and you know where the money is coming from. So it
11 condenses it all.

12 And then on top of it, speaking for our
13 platform specifically, we provide compliance tools,
14 alerts, transaction history up to 20 transactions
15 long where you can recognize what the behavior of
16 that individual was. And it is all relayed via our
17 reporting portfolio for the properties that we're
18 in.

19 So the compliance piece is just bundled
20 altogether; 'cause rated player, source of funds,
21 and then you know what their transaction history is
22 for a gaming day or a range of gaming days.

23 MR. TROMBETTA: Thank you.

24 MR. HARINTON: Thank you.

25 MR. DILLMORE: I have a follow-up question.

1 Any of the providers or anybody can answer, if they
2 want to.

3 Is there -- for an independent testing lab,
4 are these systems required to go through some type
5 of certification prior to implementation, and have
6 your systems been certified, you know, the
7 jurisdictions?

8 MR. HIRSCH: Mike Hirsch, IGT.

9 Our cashless wagering solution has gone
10 through GLI, Gaming Laboratories, International,
11 third-party testing lab. So it's been tested. I
12 think -- I don't remember what the GLI numbered it.

13 MR. SARNBLAD: Anthony Sarnblad, IGT.

14 I mean, for other jurisdictions, if they're
15 tested through GLI, then GLI is GLI 16. They've
16 got separate standards for cashless systems that
17 they would test it, approve it, or certify it for
18 other jurisdictions, yes.

19 MR. HARINTON: That's pretty identical to what
20 the IGT gentleman said. Yeah, it goes through GLI.
21 Depending on certain jurisdiction, it might go
22 through a different tribal or approval process on
23 that end. But, yes, it generally does go through
24 GLI and we can accommodate.

25 One thing I do want to call out, 'cause

1 there's a overarching name about Wallet that's
2 called out. And Wallet can be IGT, Everi, provider
3 one, provider two, provider three.

4 The piece that I want to convey is that this
5 foundational product that we have, which is called
6 Cash Club Wallet is just a mobile extension of what
7 occurs in the cages at Hialeah Park, at Gulfstream
8 today, at Dania today. So it's just an extension.
9 So that is a tried and true foundational product,
10 and then the Wallet just becomes a mobile extension
11 of that product.

12 So, yes, to answer your original question, it
13 does go through the GLI certifications and all the
14 regulatory body certifications across the United
15 States.

16 MR. SCHLAFFER: And just to add to that,
17 anytime we're getting into transferring cash from a
18 bank to another entity; now we're also going to be
19 involving FDIC regulations, you know, and other
20 federal regulations, which I'm sure will be covered
21 within the GLI. But it's something we should be
22 aware of that exists.

23 MR. TROMBETTA: Thank you. Anything else?
24 Anything else from the panel here?

25 MR. DILLMORE: How long does it typically take

1 to -- if we get to some point where something is
2 authorized, or it could be another jurisdiction, if
3 someone, if a permit holder decides to go a certain
4 route, how long does it take to implement the
5 system?

6 So, in other words, if they go with a
7 particular provider, to get all their internal
8 controls amended, to do any training as necessary,
9 what kind of a window is that? Just ballpark it.

10 MR. HIRSCH: Mike Hirsch, IGT.

11 I mean, in reality, it's probably going to
12 take about six months for an operator to get
13 everything going, honestly.

14 With external funding, there's a number of,
15 you know, contracts that have to be signed with
16 each payment service provider. Those contract
17 negotiations typically take about 16 weeks. And
18 then depending on what products they would need.

19 They may already have heard of a product that
20 they just have to enable or they may, there are
21 some new products they'd probably have to install
22 to support it. So that would have to be arranged
23 and deployed, installed, tested, that type of
24 thing. So I would say if you say go, you know, six
25 months from now they could be live.

1 MR. CALABRO: I just want to add to Mike's
2 comments. Steve Calabro from Hialeah Park.

3 So it's six months to actually install, let's
4 say, Phase 2. If we were to install at Hialeah
5 Park something similar to what is at the Seminole
6 properties currently, it would be six months. Then
7 there's another year, maybe even longer, of
8 training the customer and, you know, marketing it
9 to the customer.

10 It takes -- you know, after you install on day
11 one, you know, three months later you got maybe,
12 you know, single digit usage. A year and a half
13 later, you probably have somewhere north of
14 20 percent usage or even better. So think about
15 what we just described. A six-month installation
16 process and a one-year or more sort of a teaching
17 process to the customer, to the actual customer.

18 So what we're talking about right now, if you
19 were to tell me, you know, next month say, okay, go
20 ahead and do it, you know, it's a year and a half
21 away in normal usage as to what is in the
22 competitive market right now, what we compete with
23 right now. If we started next month, it's a year
24 and a half before we'll be close to what the
25 competitors have.

1 MR. TROMBETTA: Thank you.

2 MR. HARINTON: And the only thing I'll say on
3 that is I believe it's also, to both gentlemen's
4 points, I believe it's property specific product
5 contingent. Like I said, there are entry level
6 cashless opportunities that we can provide today
7 that I could probably implement within 30 to 60
8 days.

9 A full Wallet go live with registration, with
10 training, with training your patrons, training your
11 personnel, with other elements of it, it's a little
12 bit longer pulling the tent. But initial stuff can
13 be short-term. So product contingent, property
14 specific.

15 MR. TROMBETTA: Thank you.

16 MR. MARSHMAN: I reasonably expect that when
17 the Commissioners read this transport and start
18 thinking through this process more, they will be
19 concerned about protections of customer's or
20 patron's data that's being input into an electronic
21 payment system; whether it's in the future some
22 full-bore system that uses credit and debit or what
23 might be implemented in the meantime.

24 Any sort of accounting for that, if there's a
25 white paper you can point to us as what you think

1 is the gold standard or what your corporation can
2 offer or what the pari-mutuels would expect to
3 protect their own customer's data, the
4 Commissioners are going to want to see that, staff
5 is going to want to see that.

6 MR. TROMBETTA: Yes, sir.

7 MR. SCHLAFFER: Paul Schlaffer from Hialeah
8 Park.

9 So to follow up on Ross's comment, we would
10 have to fall under the PCI regulations again since
11 we're dealing with a financial transfer. So those
12 PCI regulations would encompass, I think, much of
13 what you're talking about in terms of encryption,
14 storing of customer data, et cetera.

15 In addition, the State of Florida, they also
16 have specific data breach statutes that requires us
17 to protect certain information. So that's going to
18 fall within that scope. I can send you more
19 information on that.

20 MR. TROMBETTA: Please do.

21 MR. HARINTON: So on behalf of Everi, I can
22 tell you that I can provide a white paper to the
23 Commission. I can also tell you that as of this
24 year we are P2PE certified at cash flow, we are
25 SOC2 compliant, and we are fully PCI tested.

1 So with that being said, I will provide the
2 documentation. I'll just do a group or a
3 distribution list of the white paper that I can
4 provide.

5 MR. TROMBETTA: And I didn't mention at the
6 beginning of this workshop. If you do so -- as I
7 did mention, we keep the record open until
8 October 9th.

9 And if you do have submissions, you can submit
10 them to us by mail. It's 4070 Esplanade Way, Suite
11 250 in Tallahassee, Florida. The other thing is
12 that we'll have an e-mail address that you can send
13 it to. It's probably easier and for us it's easier
14 too. It's clerk@flgaming.gov. Clerk@flgaming.gov.

15 If you do -- anything like that, if you can
16 submit it to that e-mail address before October
17 9th, it would be appreciated. And we can get it in
18 the record and be considered for moving forward.

19 Yes.

20 MR. HARINTON: When you specifically say a
21 white paper, are you looking for like topology and
22 how, the network diagram of how the documentation
23 is encrypted? Is it pretty much you're looking for
24 the network security components that are out there?

25 MR. TROMBETTA: I think the general concern

1 is, especially based on, you know, the news out of
2 Vegas the last three weeks, is if there's
3 additional user data collected, how is it
4 protected. So whatever you can really give on that
5 would be helpful.

6 MR. HARINTON: Thank you.

7 MR. TROMBETTA: Mr. Morton.

8 MR. MORTON: October 9th is Columbus Day. Is
9 that a State holiday?

10 MR. TROMBETTA: Oh, it is. Thank you, sir.
11 October 10th. How does October 10th sound?

12 MR. HARINTON: Just one thing. I don't want
13 to try to change the date or anything. That is
14 also corresponding with the week of G2E as well.

15 MR. TROMBETTA: I'm going to keep it to
16 October 10th. And if you're fortunate enough to be
17 going out to G2E, submit it early.

18 Anything else before we close here?

19 Okay. Well, thank you again. Again, it's now
20 about -- it's 9:53 a.m. So we did pretty good on
21 time.

22 Please, we encourage any submissions to any of
23 the questions, any of the things presented to us.
24 You know, this is the first step in a process that
25 we hope will go well; and again, we can be as

1 responsive to your needs as possible here. So
2 thank you all.

3 (Thereupon, the proceedings concluded at
4 9:54 a.m.)

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REPORTER CERTIFICATE

STATE OF FLORIDA

COUNTY OF BROWARD

I, THOMAS N. SEVIER, Registered Professional Reporter, Florida Professional Reporter, certify that I was authorized to and did stenographically report the foregoing proceedings and that the transcript is a true and complete record of my stenographic notes.

Dated this 5th day of October, 2023.



THOMAS N. SEVIER, RPR, FPR-C

<hr/> <p style="text-align: center;">0</p> <hr/> <p>021 18:13</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 13:2,11</p> <p>10 31:23</p> <p>1150 17:18</p> <p>16 40:15 42:17</p> <p>1990s 14:6</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 13:3,12 14:20 15:9</p> <p>20 14:5 37:19 39:14</p> <p>2005 22:5,12 31:18</p> <p>2016 16:11</p> <p>2023 14:6</p> <p>21st 4:11</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 13:5,12</p>	<hr/> <p style="text-align: center;">4</p> <hr/> <p>40 12:13</p> <p>401(k) 25:24</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 11:17</p> <p>50 12:13</p> <p>551 9:14 29:24</p> <p>551.021 18:13</p> <p>551.121 18:14</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 18:13,14 24:19 28:4</p> <p>6th 4:12</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>80s 14:8</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>90s 14:8</p> <p>9th 4:14,15</p>	<hr/> <p style="text-align: center;">A</p> <hr/> <p>ability 9:23 13:17 14:12 21:20</p> <p>Absolutely 32:9</p> <p>access 14:12 18:4,9 20:22 37:3</p> <p>accessing 19:22 20:13, 19,23</p> <p>accommodate 40:24</p> <p>account 5:18,19 6:4, 5,7,8,9,14, 20,21,24 7:3, 4,16,18 8:1, 4,11 15:3 24:16,23,25 25:1,3 35:13, 14,15,17 36:6,7,10</p> <p>accounts 7:1 25:24</p> <p>ACH 25:22 30:23</p> <p>acronym 20:16</p> <p>acronyms 4:2</p> <p>act 39:2</p> <p>actual 28:19</p> <p>Adam</p>	<p>15:13 19:21 32:17 33:4 37:8,19 38:19,20</p> <p>add 10:15 35:21 37:7 41:16</p> <p>Additionally 4:8</p> <p>address 9:14 28:10</p> <p>addressing 28:12</p> <p>advance 13:17,24 14:7,13 18:3</p> <p>advances 28:7 32:21</p> <p>affirmative 30:15</p> <p>agnostic 21:17</p> <p>ahead 19:17</p> <p>alerts 39:14</p> <p>allowed 18:17,21,22 22:2</p> <p>allowing 5:2 10:5</p> <p>altogether 39:20</p> <p>amend 31:20</p> <p>amended 42:8</p>
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Anthony 40:13	arrangement 38:14	ballpark 42:9	body 41:14
anti-money 38:12,16	asks 30:9	bank 6:21 25:24 41:18	booth 5:8
anymore 33:13	aspects 23:8	baseball 33:9 34:22	brains 25:14
anytime 41:17	assessing 9:4	based 6:17 38:14	brainstorming 31:4
apex 15:22	assimilate 16:1	basically 14:10 23:5 35:12	break 30:6
app 13:4 23:2,3, 4,24 24:9,10 31:8,9 36:5, 12	ATM 19:2,5,7	basis 8:12	breaks 33:17
applaud 11:5	ATMS 18:6 19:4 25:20	begin 4:5	bring 14:9 19:2 23:19 24:10 25:14
application 7:9	attest 16:6 17:5	beginning 26:5	bringing 23:12
appreciated 22:19	attic 37:15	behavior 39:15	brought 9:20
approval 12:22 13:8 40:22	auditing 8:15	behaviors 17:2	Broward 11:10
approve 40:17	Austin 33:10	bet 24:7	bucks 24:6,9
apps 31:7	authorized 5:15 9:18 42:2	betting 23:20 24:4	building 14:4
arcade 33:21	aware 9:22 41:22	beverage 33:23 34:11	bunch 6:12 8:14
area 21:14 27:25 28:22 30:4 31:6	<hr/> B <hr/>	big 12:10 33:19	bundled 39:19
areas 26:24 34:24	back 7:25 8:3 9:3 13:6 15:7,11 32:25 33:18 34:16 37:14	bit 4:16 12:19 16:20 22:13 26:24 27:1 31:5 35:8	business 17:6
arranged 42:22	balance 9:6	bizarre 31:3	button 38:7
			buy 36:18

C	careful 14:25	cell 36:12	code 7:14
cage 13:21,22	case 13:22	centered 5:16	cognizant 4:1 19:24
cages 41:7	cash 6:10,12 7:24 13:17,21,23, 24 14:7,12,13 16:7,8,9 17:11 18:3,4, 8 19:22 20:20,21 24:12 25:2,3, 4 31:7,8 33:13,19 37:14 38:4,5 41:6,17	certification 40:5	comfortable 25:23
Calabro 11:2 14:15,19 22:20,22 30:20 32:8 35:21,24 36:21 37:6,7 38:18 39:5	cashing 36:20,23,24 37:1,2	certifications 41:13,14	comment 19:20 24:15 25:15 30:7
call 15:22 20:13 21:14 30:22, 23 33:5 40:25	cashless 5:4,9,19 6:4, 11 7:3,8,16 8:14 11:5,10 12:2,13,23 14:1 15:18 16:3 18:9 24:10,22 27:15,18 31:21 33:12, 25 34:4,24 37:24 40:9,16	certified 40:6	comments 4:19 11:1 22:17 27:23 28:9 35:3
called 6:15 41:2,5	casino 5:20 6:3,12 23:9,12,15 24:11,12 33:21 34:2 36:11	certify 40:17	Commission 10:19 27:12, 14,22,24,25 28:15 29:8 31:14 33:6 34:19 37:22
capitalize 15:16	casinos 11:22	cetera 8:6 22:8 25:25 35:20	Commission's 26:25
car 20:9		change 31:17 38:23 39:6	Commissioners 26:17 30:3
card 6:22 7:5,6, 10,12 9:16,17 12:19 13:22, 23 14:23 15:4 22:14 23:2,24 24:2,7 25:8,9 30:25 31:4,5, 9,13 34:13, 14,15		changed 22:13 31:19	common 4:3
carded 7:13		Chapter 9:14	communicate 30:15
cards 10:6 13:16 14:13 22:8,11 25:19		check 15:9 36:20, 22,24 37:1,2	company 12:11,12
		checking 15:3 35:13,17	compete 11:9 32:22
		Classic 12:2	competitive 11:15
		cleans 37:17	completed 20:11
		clear 10:20 20:16	compliance 17:8 38:23,25 39:8,13,19
		close 10:8	
		Club 41:6	

complying 30:16	9:10	24:6 32:12	decides 42:3
concentration 34:24	country 8:18 12:10	36:4,10	definition 29:23
concept 13:10 35:16	couple 26:4	customer's 13:18	degree 37:18
concert 33:11	court 4:1,23	customers 11:18,21	demo 8:22
concerts 34:22	courts 24:3	12:25 14:12	demonstration 5:9
condenses 39:11	covered 41:20	32:19 33:16	depending 26:12 27:3
confidential 30:12,18	covers 26:23	<hr/> D <hr/>	40:21 42:18
configurable 8:2	COVID 11:12	Dade 11:10	deployed 5:4,15 42:23
contemplated 22:10,15	crawl 16:2	daily 8:9,12	deploying 5:12
continue 19:18	crazy 31:12	Dana 18:2 32:10	deposit 8:9
contract 42:16	created 28:6 34:5	Dana's 33:14	describe 14:3
contracts 42:15	credential 34:7	Dania 41:8	desire 27:24 30:2
Control 31:14	credit 9:16 10:6	date 10:3	detail 35:11
controls 42:8	12:19 13:16,	day 39:22	determination 17:9
convey 41:4	22 14:12,23	days 39:22	determine 21:1
conveyed 27:10	15:4 22:4,7	deal 11:13	development 7:7
cost 16:7,8,9	23:2,24 24:2,	dealing 28:11	device 20:21 24:3
couch 20:8 32:18	6 25:9,19	debit 6:22 9:17	25:8 36:12
Counsel	29:25 30:25	10:6 13:16,23	difficult 20:18 31:17
	31:4,9,13	14:13,23 15:4	DILLMORE 21:4,23 35:4
	34:6	25:8,19 29:25	
	current 12:18	30:25 31:5,13	
	customer 5:21 13:19,20	decent 28:5	
	14:21 23:1		

36:14 39:25 41:25 directly 25:10 disadvantage 32:15 disagrees 12:6 discussed 35:19 discussions 27:23 DNI 33:20 documentation 4:10 9:1 dollars 20:4,5 download 13:5 23:23 24:5,6,8 32:18 downloaded 13:7 downloading 13:4 23:1,10 24:2 36:5 Downtown 23:7,23 draft 29:14 drafted 22:15 driver's 5:24	<hr/> E <hr/> e-check 15:2 30:23,24 31:1,7 35:6, 22 36:1 37:1 e-mails 27:16 e-wallet 6:22 earlier 16:25 37:8 educated 27:6 education 19:25 efficiencies 34:5 efficiency 33:14,15 electronic 9:14,17 10:7 22:3,7 elements 28:10 embrace 37:11 emphasize 24:21 25:11 enable 6:4 42:20 enables 39:7 encourage 5:8 end 10:18 26:25 28:11,12,19	29:16 40:23 ends 29:14 enroll 5:19 7:1 ensure 6:1 30:16 enterprise 33:25 34:1 entertainment 33:8,13 34:21 entity 41:18 environment 33:21 37:24 envision 32:24 equivalent 25:4 essentially 20:24 37:2 established 20:5 36:25 event 33:8 Everi 15:13,23 16:8 19:21 23:5 39:1 41:2 Everi's 24:10 exact 19:3 excluded 25:21 Excuse 39:4	exempt 30:12 exists 41:22 expect 30:14 expeditiously 26:21 experience 11:23 12:3 28:19 experiences 13:20 explain 38:19 explaining 13:19 explore 10:13 exploring 19:8 extension 41:6,8,10 external 6:13,19 9:20 20:19 42:14 EZ 6:6 <hr/> F <hr/> faced 16:17 facility 10:13 13:18 14:14 29:20 34:9 fact 11:5
--	--	--	---

fall 39:1	24:13 25:20	Friday 4:12	gaining 17:20,21,22
familiar 28:23 35:6	Florida 12:9 23:21 24:8 30:17 31:14	friendly 32:13	game 7:11 13:1 33:9,10
FDIC 41:19	Florida's 30:12	front 33:22	gaming 10:19 12:12 20:5,15 21:9 25:20 26:25 31:14 35:17 39:22 40:10
feature 16:13	flow 8:3	full 4:4 12:22	
features 7:9	folks 35:6	full-on 12:13	
federal 41:20	follow-up 35:5 39:25	functionality 28:18	gamut 12:22
feedback 10:1	food 33:23	functionally 28:13	gateway 6:16
FGCC 37:10 38:3	football 34:22	fund 6:8,9,13,14, 19 7:2	general 8:3,13 9:10 21:22
figure 18:12,23 19:9 28:20 30:1 32:25 38:6	foreseeing 28:9	funded 6:23	generally 9:21 21:16,19 40:23
figured 35:25	format 37:24	funding 6:13,19 7:23 9:21 17:6 24:22,23,25 42:14	gentleman 40:20
final 13:13	forward 9:3 11:19 17:23 26:6,21 34:17	funds 7:15 10:7 13:4,6 14:22 15:2 20:14, 19,23 23:1 24:11 31:10 35:14,17 36:7,12 39:9, 20	geofence 21:1,7,11,13, 21
financial 10:9	foundational 41:5,9		get all 42:7
Firm 22:1	fourth 12:11		give 4:13,16 5:6,9 32:23 33:20
fit 10:24	framework 10:5,24		GLI 40:10,12,15, 20,24 41:13, 21
flexibility 9:25 10:25	frankly 26:11	<hr/> G <hr/>	goal 15:20 16:23 26:20 33:1
flexible 9:23	fraud 6:2,25	G2e 5:7 8:21 17:18 28:25	
floor 18:4,5,7,9,10 20:4,15,25 21:9 23:16	fraudulent 17:10		

good 9:13 15:14	Harinton 15:12,13 19:11,15,21 21:5,10 33:4 36:17 38:20, 21 39:6,24 40:19	hockey 33:9	important 16:16
Grand 15:19	hear 4:24 14:24 24:5	holder 11:3,4 42:3	include 36:9
gray 31:5	heard 13:15 42:19	holders 9:7 10:17 28:13	included 18:8
great 12:15 19:9	hearing 26:10	honestly 28:22 42:13	including 8:25
Group 17:18	heed 37:9	hook 25:8	incorporate 7:8
guess 25:4	helpful 9:2 19:1	hurdle 28:5,11	increasing 16:7
guitar 11:25	helps 38:9	<hr/> I <hr/>	independent 40:3
Gulfstream 18:2 32:10 41:7	hey 21:13 29:10	idea 9:20 29:5 31:4 32:24	Indians 11:9
guys 4:13 10:18,25 12:18 15:12 17:23 26:6 27:6 28:19 29:5,10	Hialeah 11:2 12:5 13:10 16:20 22:22 23:3 25:17 30:20 35:6,24 41:7	identical 40:19	individual 38:9 39:16
<hr/> H <hr/>	high 37:18	identify 4:4 22:21	industry 4:3 5:22 30:4 34:2
half 16:10	higher 34:23	IGT 5:1 6:15 8:25 23:5 24:18 40:8,13,20 41:2 42:10	information 10:11 18:25 27:7,10 30:11
hand 34:15	highest 37:11	IGT's 24:9	initiated 27:21
handling 33:19	Hirsch 4:25 24:18 40:8 42:10	implement 42:4	input 7:14 26:20
hands 4:20	history 22:5 39:14,21	implementation 40:5	install 42:21
happening 24:12		implemented 8:17	installed 42:23
hard 20:25			instance 13:25 33:9
			instances 9:15
			instigated 27:8

intent 10:22 30:3	jurisdiction 40:21 42:2	Las 17:21	licensed 10:19
interest 5:12 27:22	jurisdictions 40:7,14,18	laundering 38:12,17	limit 8:9
interested 26:19 29:17, 21	<hr/> K <hr/>	law 21:25 30:17 31:6,12,17, 18,20 32:14	limits 8:9 29:6
internal 27:22 42:7	keeping 4:8	lawmakers 31:15	listen 22:23
International 40:10	kind 4:2,3 8:25 9:4,8,11 16:5 17:15 18:16, 21 28:5 29:13 35:25 37:25 42:9	laws 12:18 30:13	live 42:25
internationally 5:5	kiosk 12:24,25 35:20	lawyers 18:24 25:6 31:22	living 23:6,22
investigating 38:2,3	knowledge 21:20	learn 28:24	located 24:20
investigation 37:25	KYC 5:22	learning 17:1	location 20:15 21:21 23:11
investigators 37:10 38:3	<hr/> L <hr/>	leave 25:21 26:12	locations 12:14
involving 41:19	lab 40:3,11	legal 14:3 23:8 28:10 29:6	Lockwood 21:25
issue 25:5 29:1	Laboratories 40:10	leaving 34:14	logical 32:1
issues 30:25 34:9	lands 17:22	left 7:24	long 31:16 39:15 41:25 42:4
issuing 22:9	language 9:12 26:8 30:1	legislative 22:5 32:4	looked 19:2
<hr/> J <hr/>	largest 12:11,12	legit 17:7	loop 10:8
Joe 35:21		Leibovitz 18:2 32:10	lose 11:17
Jon 26:3		level 37:12	lot 5:11 24:3 33:24 35:22
journey 19:25		license 5:25	lots 32:17
jump 27:2			

Lou 17:19	means 5:23 18:23	mind 4:22 19:14 30:19	20:16
loyalty 5:17,18 7:12	mechanisms 15:18	Mine 19:16	muddied 32:3
<hr/> M <hr/>	meeting 27:21	minutes 37:19	muddy 22:24
machine 7:4,13,16,21 8:6 13:3,6 14:2,22 23:14 24:20,21,24 25:2,9 29:24 35:20 36:13	meetings 27:24	misconceptions 17:12	multiple 9:20,24 12:23
made 27:24	mention 5:3 8:7	mobile 7:9 23:19 24:2 37:3 41:6,10	<hr/> N <hr/>
make 14:1 16:14 22:11 23:25 24:7 26:4 28:6 30:2 31:25 33:2	mentioned 5:11 11:12 35:5 37:19	modern 14:9	National 12:10
makes 37:22	meter 7:18	Monday 4:15	necessarily 20:14,24
making 22:8 34:11	meters 7:17,18	money 7:3,17,21,24 8:3,10,11 18:19,20 20:12 25:1,3, 10 32:20 39:10	neglected 8:7
management 5:1	method 7:23	monitoring 38:17	negotiations 42:17
mark 30:11,17	methods 6:19	months 42:12,25	Nevada 17:21
market 11:9	Miami 23:7,23	morning 9:13	nice 16:12,13
marketer 16:15	Michael 36:18	Morton 19:16 21:25	non-cashless 33:25
Marshman 9:10,13 28:3 30:6	mid-2000s 7:20	move 11:19 14:5 26:21 34:17	notification 38:17
matters 27:7	migrate 15:18	moving 11:6	number 5:3,13,25 6:18 7:8 8:16 11:11 14:20 24:19 35:13 36:6,10 42:14
	Mike 4:25 15:14 16:5 17:3 24:18 40:8 42:10	mud	numbered 40:12
	Mike's 16:25		numbers 16:12
	miles 11:17		nuts 31:23

<hr/> O <hr/>	16:23 38:15 42:12	30:20 32:11 35:6,25 41:7	permit 9:6 10:17 11:3 28:13 42:3
obstacle 29:22	operators 9:7 10:21 16:6	part 7:19 9:1,17 24:1 26:16	person 20:8 30:7 34:10
occur 21:8 23:20,21 31:17 38:1	opinion 38:20,22	parties 33:6	personnel 33:23
occurred 20:7 38:8	opportunity 17:24	partner 21:18	perspective 38:23
occurring 20:25 21:15 23:9,20	option 8:8 10:12	party 21:19	pertaining 27:17
occurs 20:4,18 37:23 41:7	options 8:2 26:14	pass 7:14 18:25	petition 27:9 31:14
ocean 10:9	organic 16:24	path 16:5	phase 13:2,3,5,11, 12 14:20,21 15:9 27:2
October 4:14,15 10:3	original 41:12	Paul 25:16 30:21 35:23	phases 35:19
offer 9:24 15:25 16:3 21:11 29:1,10,20	overarching 41:1	pay 6:6,15 35:22	phone 7:11,12 23:13,14 24:7,10
offerings 15:23,24	overcome 29:21	paying 34:17	physically 7:5
offers 8:24 15:24	overview 5:6 8:13	payment 6:16 9:15,17 22:3 42:16	pie 15:20
one-time 7:13 36:8	<hr/> P <hr/>	payouts 22:9,12	piece 15:15 33:15 39:19 41:4
onus 38:22,24 39:6	pandemic 5:12	Paypal 6:23 31:8	piggyback 30:21 32:11
open 4:9,12,14 10:8 26:12	panel 9:22 41:24	Penn 12:10	pin 7:13
operating 8:21	pari-mutuel 11:22 12:4,5	people 5:16 11:13 25:13 31:22	place 12:9 16:21
operator 6:18 7:8	pari-mutuels 13:17	percent 34:3	
	Park 11:2 12:5 13:10 16:20 18:3 22:22 23:3 25:17	percentage 16:18,19,21	

28:7	politician	procedurally	7:19
places	32:3	25:13	provide
9:14 33:19	population	process	9:10 10:10
plan	34:24	9:2 24:1	22:16 28:20
28:25	portfolio	26:20 36:4	39:13
planning	39:17	37:18 39:8	provided
26:7,9	portion	40:22	9:5 27:7
platform	19:18 26:1	processed	provider
37:3 39:13	38:25	33:17	21:17 38:14,
play	position	processor	15 41:2,3
7:22 8:5	29:9	39:2	42:7,16
16:18,21	possibility	product	providers
28:14	32:5	5:1 20:2	6:16 15:25
player	potential	41:5,9,11	17:4 38:18
5:17,18,20,23	11:7	42:19	40:1
6:3,7,11,23	PPI	product's	provision
7:4 8:8	26:4	9:23	22:6
16:23,24	preclude	products	public
17:1,14,16	22:6	9:24 16:3	4:19 30:8,13
22:8,11,14	preference	42:18,21	publicly
36:19,21,23	6:17	program	27:17 30:8
39:9,20	preregistered	36:20,23,25	publish
player's	36:20,22	prohibition	7:6
6:4 7:6	presentation	25:18	purposes
players	15:14	properties	6:10
17:2	pretty	5:14 8:17	push
pocket	12:10 15:14	39:17	38:7
20:20 37:14	28:4,5 40:19	property	put
point	prevent	20:10,12 23:2	8:11 11:4
4:18 9:19	6:1 8:10	32:19 34:3	21:1,7,13,20
10:2 15:6,17	prevention	39:4,5	28:3,13 29:13
16:14,25	6:25	property's	35:12
17:17 19:22	prior	39:8	puts
27:8 31:10,11	27:8 28:6	proposal	32:15
33:15,19	30:16 33:19	34:20	
34:6,19 37:21	40:5	proposed	
42:1	procedural	10:12 26:8	
poker	19:16	protocol	
13:22			
			Q
			question
			19:1,3 21:4

22:2,20 28:2 31:12 32:7 35:4 36:16 39:25 41:12 questions 8:19 16:17 26:4 38:11 quick 33:17 quicker 17:10 34:18	received 27:15 recognize 19:20 39:15 reconciliation 17:8 record 4:8 11:5,18 30:8,13 records 27:15,17 referred 5:22 register 36:5 registered 36:24 registration 36:4,9 regulation 6:17 regulations 41:19,20 regulator 37:10 39:1,3 regulators 9:23 37:8 regulatory 38:10 41:14 relates 24:4 31:20 relayed 39:16 remember 21:16 40:12 report 38:7,8	reporter 4:1,23 reporting 39:17 reports 8:14 representing 4:6 26:3 required 40:4 resources 33:24 responding 28:1 responsible 38:16 responsive 30:4 restrict 21:21 restriction 9:16 restrictions 19:4 restrictive 29:11 retail 33:24 review 10:14 26:17 reviewing 5:24 road 11:17 32:16 room 8:24 9:7 10:2,21 17:4 18:24 23:6,22	Ross 9:9 route 42:4 routing 35:13 36:6,9 rule 29:14 rumor 14:25 run 16:2
<hr/> R <hr/>			<hr/> S <hr/>
raise 4:20 range 39:22 rated 16:18,21 17:16 39:9,20 reach 5:14 28:25 read 9:1 28:4 real 11:13 16:11 17:9 38:4 reality 10:16 13:19 17:3 32:2 34:4 42:11 realizing 26:23 reasons 6:13 receive 22:12		reporter 4:1,23 reporting 39:17 reports 8:14 representing 4:6 26:3 required 40:4 resources 33:24 responding 28:1 responsible 38:16 responsive 30:4 restrict 21:21 restriction 9:16 restrictions 19:4 restrictive 29:11 retail 33:24 review 10:14 26:17 reviewing 5:24 road 11:17 32:16 room 8:24 9:7 10:2,21 17:4 18:24 23:6,22	sale 34:6 Sarnblad 40:13 SAS 7:19 save 30:23 scenario 16:2,4 19:23 36:17,18 scenarios 21:2,16 Schlaffer 25:16 35:12 41:16 Schlaffer's 30:21 SDK 7:7 secondarily 33:18 secret

30:11	42:16	20,23 25:2	spoken
secretive	setting	29:24	17:19
17:15	8:9	soccer	sporting
section	setup	33:10	33:7
18:18	36:8	Social	sports
secure	shirt	5:25	23:19 24:4,7
7:14	34:12	software	stack
security	shrink	7:7	21:11,22
5:25 6:12	39:8	solution	standards
34:8	sight	5:16 8:15,20	40:16
seeking	34:14	10:12,18,21,	standing
10:1	signed	23,24 11:7,20	4:23
seemingly	42:15	12:7,8,17	standpoint
9:16 10:5	significantly	21:8 25:20	34:8 36:2
sell	31:19	34:20 40:9	38:10
37:21	signs	solutions	start
selling	8:8	5:4,13 8:24	4:21 28:17
34:12 37:21	similar	9:5 10:4	started
Seminole	11:20 12:7	somebody's	14:18 16:11
11:9 12:2	14:17 22:25	37:14	starting
14:17	simple	sort	27:12
Seminoles	15:10 38:1	10:3,7,8	starts
15:5	sir	13:25 18:19	18:19 24:19
send	18:1 25:15	19:2 21:18	State
13:6 15:7	sit	27:3 31:3	12:8,22 23:21
30:14	32:18	source	stated
sending	sitting	13:4,7,16	32:14
30:17	20:8 23:22	15:8 39:9,20	states
sentence	situation	sources	5:5,13,14
18:21 22:6	10:16	9:21 34:21	8:16 9:24
sentences	skim	speak	12:12 41:15
18:19	23:5	4:20 21:12	statute
separate	sky	speaker's	9:7 22:4,15
40:16	15:20	9:19	26:1 28:6
servers	slot	speaking	29:11,22
33:22	13:3,6 14:2,	4:5 9:21 12:5	stays
service	22 21:18	39:12	34:15
6:16 34:16	23:14 24:19,	specifically	
		39:13	

steam 17:20,21,22	supply 35:10	31:18	10:11 26:15
step 12:23,24 30:10,15	support 42:22	terminology 10:9	till 4:14
steps 12:23	supposed 32:8	terms 9:11 18:17 22:3	time 15:6 16:15 26:24
Steve 11:2 22:22 30:20 31:22 32:11 35:24 36:21 37:7	system 5:10 6:5,6 9:15,18 10:7 18:22 21:19 42:5	test 40:17	times 16:10
Steve's 15:16	systems 22:3,4,7 40:4,6,16	tested 40:11,15 42:23	today 4:11 10:2 26:7 41:8
stick 25:8	<hr/> T <hr/>	testing 40:3,11	tools 39:13
stored 7:12	T.J. 21:25	Texas 33:10	top 39:12
straight 26:10	takes 33:24	thing 8:7 11:4,15 12:21 13:13 14:7 15:16 16:4,6 21:19 23:18 33:5 37:6 40:25 42:24	topic 31:20
strategic 21:14	talk 12:20 13:14	things 6:1 18:11,20 19:23 21:21 29:13 32:17	touched 21:5
stuff 27:16 29:10 38:12	talked 16:5 35:7	thinking 13:9	touching 34:12,15
subject 27:7	talking 12:16 17:23 18:6 21:17 24:20 27:20 32:12 36:3	third-party 40:11	tough 31:6 38:4
submissions 29:17	talks 15:19 29:24	thoughts 29:21	traceable 37:16,24
submit 4:9 8:25	Tallahassee 31:22	ticket 13:1	tracked 17:15 37:12
Subsection 28:4	technological 20:21 28:7	ticketing 6:6	tracking 38:10
substantive 19:17,18	technology 17:13 21:11, 22 22:13	tie	trade 30:11
suggestion 30:22			training 42:8
			transacted 20:6
			transacting 20:15 34:11

transaction	14:15 15:11	11:24	venues
13:23 17:7,11	17:25 18:11	ukulele	33:12,13,14
19:6,7 20:1,	19:13,19	11:25 32:16	verify
3,4,7,11,17,	21:3,24	ultimate	5:20 15:8
24 21:15	22:18,21	15:20,22	verifying
24:12 34:6,7,	24:14 25:12	16:22	5:23
18 35:9 37:23	26:2,11	understand	version
38:24,25	27:13,21	12:17 19:25	14:6,9
39:3,14,21	28:16 29:16	38:13	versions
transactions	32:6,9,23	understood	15:21
15:7 17:9,10	35:1 36:15	13:14 26:5	versus
21:8 25:22,24	37:5 38:11	United	14:6
35:7 37:17	39:23 41:23	12:12 41:14	viable
38:4 39:14	Trombetta's	unrated	34:20
transcript	10:2	17:1	view
26:17	true	upheld	10:17
transfer	17:16 41:9	24:3	vision
7:15,18 10:7	turn	user	29:19
14:22 15:2	4:18 9:9	28:19	visit
24:11 25:1,10	turns	utilities	5:8 6:12
31:9 35:14	37:2	35:22	<hr/>
36:7,12	two-pronged	utilize	W
transferred	28:9	16:25 20:2,3	<hr/>
7:25	two-way	utilizing	wager
transferring	15:6	36:21	23:25
23:13 35:16	type	<hr/>	wagering
41:17	4:10 5:17	v	5:4,10 6:4,7,
transfers	6:25 7:22	<hr/>	14,19 7:3,16,
7:17	10:18 11:23	vague	18,25 8:4,11,
transmit	16:3 17:13	22:4	14 24:23,25
30:10	18:22 19:5,7	varies	25:1,3 40:9
tribal	21:1,7 29:1	38:13	wagers
17:22 40:22	40:4 42:23	Vegas	22:8,12
Tribe	typically	17:21	walk
14:17	30:9 41:25	Venmo	16:2
tricky	42:17	6:23 31:8	walked
12:19	<hr/>	venue	20:9
TROMBETTA	U	33:8	walking
8:23 10:15	<hr/>	uku	20:20,21

walks 13:20	working 4:6 11:3 33:23	
wallet 15:15,19,20 17:1,7,13 19:23 20:1,3, 6,12,13 21:16 34:16 41:1,2, 6,10	works 5:10 28:21 29:2	
wanted 5:3,6 8:5,20 25:11	workshop 11:6 26:7,9 27:3	
WAT 7:17	world 32:3,4	
water 22:24	worry 30:24	
ways 23:17	written 22:16 31:18	
weekend 4:14	wrong 13:15 18:15	
weeks 4:9,16 33:10 42:17	<hr/> Y <hr/>	
window 33:20,21 42:9	year 13:11 16:7	
wishes 4:9	years 11:11 13:12 16:9 27:14 31:23	
words 23:14 42:6	<hr/> Z <hr/>	
work 5:1 10:4 12:17 16:22 19:3 25:6 28:7 30:2 33:2 35:9 37:10	Zachem 26:3 27:5,19 28:2 29:15	
worked 5:7		