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FLORIDA GAMING CONTROL COMMISSION
CASHLESS WAGERING RULE WORKSHOP

THURSDAY, JANUARY 25, 2024
10:01 a.m. - 11:40 a.m.

1400 West Commercial Boulevard, Suite 165
Fort Lauderdale, Florida 33309

Reported and transcribed by:
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Job No.: 344540

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3 Executive Director, Louis Trombetta
4 Elina Valentine, Deputy General Counsel
5 Elizabeth K. Stinson, Chief Attorney
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7 Deputy Executive Director and Chief Legal Officer
8 Joe Dillmore, Director Pari-Mutuel Wagering

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1 MR. TROMBETTA: Good morning, everybody.

2 My name is Lou Trombetta. It's 10 o'clock or
3 close to it. Debbie, how are we looking? Are
4 there people waiting? We do have a few seats for
5 people that are there. There's one right here. I
6 thought I saw one in the back. There's
7 potentially one right here. So we do have some
8 seats.

9 My name is Lou Trombetta. We're here for
10 second rule workshop on our cashless wagering
11 venture. I'm going to turn it over to Elizabeth
12 Stinson who is going to read the opening remarks.
13 She'll turn it back to me, and then we'll start
14 from there.

15 MS. STINSON: Good morning. As Lou said, my
16 name is Elizabeth Stinson. This is a rule
17 development workshop and it's pertaining to
18 cashless wagering, the thimbles of Chapter
19 75-14.001, 75-14.016, 75-14.022, 75-14.047,
20 75-14.054, 75-14.072, and 75-14.076 of the Florida
21 Administrative Code.

22 With me at this workshop are Louis Trombetta,
23 the executive director of the Florida Gaming
24 Control Commission; Ross Marshman, the Deputy
25 Executive Director and Chief Legal Officer; Elina

1 Valentine who is the Deputy General Counsel; and
2 Joe Dillmore, the division director for the
3 division of pari-mutuel wagering. We also have
4 Bill Crafts who is the chief of slot operations;
5 and Dennis Chen who is the slot operations manager
6 for Miami-Dade.

7 We will now have our opening remarks by
8 Executive Director Trombetta.

9 MR. TROMBETTA: Thank you. As you can see,
10 we needed to knock out some legal stuff so I don't
11 have to think about it. So we provided an agenda.
12 Essentially the agenda captures some of the things
13 that we're trying to figure out internally from
14 the people we have here on the panel plus Bill and
15 Dennis.

16 It is something that we're trying to figure
17 out how to best go forward. The questions that we
18 provided in that agenda are based on sort of three
19 main things that we're looking at. So the first
20 one is what's, like, the legal box in which we can
21 operate. I can tell you that big-picture-wise
22 what we're trying to do is provide the fence and
23 say, "You guys can go figure out how to operate in
24 this fence."

25 Our intent is not to provide very, like,

1 super specific "This is the only way to do it."

2 It's just, "Here's where you guys can do -- or

3 here's what you guys can do."

4 The second part is how it will actually
5 function. And this goes to the basics of how it
6 functions to some of the technical requirements.

7 And then third is really kind of the
8 security, consumer protection, bank security that
9 we're also looking at. So a lot of our questions
10 kind of go towards those three things.

11 I think just for efficiency of this meeting,
12 my plan is to kind of first just kind of open the
13 floor. If you have a question, please raise your
14 hand and wait to be recognized. It just makes it
15 much easier for the record. Identify who you're
16 working for, who you're representing, and then I
17 think I'm going to do it in two parts.

18 First part, I'll just turn it over if you
19 want to run through any comments you have on the
20 agenda or questions or anything outside that as
21 well, you can do that. And then, kind of a
22 closeout period, and then we'll just go through
23 and I'll say, "Any other comments on question A?
24 Any other comments on question B?" I'll go down
25 the list afterwards. I think if we get everything

1 out in the front, it will all be there. That way,
2 I think it might be faster than going and having
3 multiple comments on each question, one after the
4 other. Secondly, the record. You didn't cover
5 the record, right?

6 MS. STINSON: No.

7 MR. TROMBETTA: So we want to leave the
8 record open for a period of probably two weeks to
9 receive written comment. We've already received
10 some written comment that has been helpful.
11 Essentially one question, my question provided
12 answers in an overview, anything like that will be
13 helpful for you, for any of the attorneys
14 representing you, for the people in the room.
15 Just anything you can give us. Let's just see.

16 So two weeks from today would be
17 February 8th. I might just allow that weekend.
18 So February 12th. So let's just do that. We're
19 going to keep the record open until February 12,
20 which is Monday, so you have the weekend too. Let
21 me make a note. Yeah. Okay.

22 So let's start. I guess, does anybody have
23 any questions just based on anything really?
24 Let's open it up to that first part.

25 MS. KAUFFMAN: I just wanted to ask, is there

1 going to be any discussion --

2 MR. TROMBETTA: Can you identify yourself for
3 the record, please?

4 MS. KAUFFMAN: I'm sorry. I'm Audrey
5 Kauffman with the Stronach Group. So will we be
6 discussing consumer protections around this
7 product?

8 MR. TROMBETTA: Yes, ma'am. It's one of the
9 things we're interested in trying to figure out
10 how -- from our research, it sounds like most of
11 these work. To do a cash system, you essentially
12 create a bank account for the customer. What
13 security, what controls are in place to make sure
14 that both identification data as well as the
15 financial data is secure. That's what we're
16 looking at. Sorry, on the record stuff. Thank
17 you.

18 Liz, can you cover that?

19 MS. STINSON: Yes.

20 MR. TROMBETTA: So we're going to keep the
21 record open until February 12th, where should
22 comments be submitted?

23 MS. STINSON: Comments -- if you want to
24 submit written comments, the e-mail address is
25 clerk@flgaming.gov.

1 MR. TROMBETTA: Thank you.

2 MS. STINSON: Sure.

3 MR. CALABRO: My name is Steve Calabro from
4 Hialeah Park. This is a pretty broad question
5 here. From a competitive standpoint, I just want
6 to be able to know, you've researched -- I believe
7 the State has researched how cashless works at our
8 competitor. It would be that little group called
9 the Seminoles.

10 Is -- are the rules -- when you speak, you
11 speak about the feds and, you know, there's
12 different rules, different laws, more so laws.
13 Will we be able to basically operate -- and this
14 is a broad question -- very, very similar as a
15 customer experience that a pari-mutuel facility in
16 cashless and a tribal facility in a cashless
17 environment.

18 They are operating for the last few years
19 with this to where we're already behind the eight
20 ball because technology that came out five years
21 ago they installed a couple years ago, and we're
22 probably some time out before we're even
23 installed. The worst thing would be if we install
24 something that is a lesser and negative customer
25 experience, not the casino operators, but the

1 customer that is sitting in front of the slot
2 machine. That's question I have -- I ask that
3 question in a broad sense because I'm pretty
4 certain you've observed the Seminole cashless
5 system.

6 MR. TROMBETTA: So what we're trying -- it's
7 a good question. What we're -- hopefully our rule
8 will not necessarily lay out what specific type of
9 experience you can offer the customer, but instead
10 kind of say, this is what -- these are the types
11 of payment options you can accept. This is where
12 the players can do certain transactions. From the
13 question, I'm not trying to hide anything at all
14 here.

15 First two questions go to: What's an
16 electronic payment system? What's an electronic
17 private system? Those two terms are used in
18 statute. And we're trying to figure out exactly
19 what that means. Ideally, we kind of have an
20 idea, okay, this covers two things: One is sort
21 of how players can get money into the system; two,
22 how the system interacts with the slot machine and
23 sort of your back side.

24 So I don't -- since you -- I don't envision
25 us kind of saying, "This is what it has to be" in

1 terms of you have to use a certain company that
2 provides a specific type of platform. Instead I
3 think what we're trying to envision is more of a
4 rule that says, you know, a cashless system has to
5 make sure it does this so that you guys can
6 operate in that as long as you're hitting those
7 boxes essentially. That's kind of what -- right
8 now that's what the thought process is.

9 I'm trying to be open with you guys. This is
10 a process for us, too. So we need feedback from
11 you so that we can go forward. In the big
12 picture, right, there's workshops -- right now we
13 don't even have language. So we're still early
14 on. We're going to put language out at some
15 point. Hopefully after this workshop, we'll get
16 feedback from you, our goal is to get the language
17 out. And then, again, meet with everybody and
18 figure out sort of if this language does what it's
19 supposed to do.

20 To be candid, things can change based on what
21 we get from you. We're trying to figure out how
22 to best go forward here, too. So anything you can
23 give us in terms of what type of experience you
24 think you'd like to be able to offer, or you
25 think, you know, so like in response to the

1 question about location.

2 So the other thing that we're trying to
3 figure out is in 521 it talks about limitations on
4 where certain types of transactions can happen,
5 right? Because you can't have a credit card
6 transaction on the casino floor. So what we're
7 trying to figure out is how to -- how can we
8 incorporate that in the capture system. Is it
9 just -- and we've talked about maybe we can do
10 some type of geolocation. You can't just put
11 money from a certain area on the slot floor. You
12 have to go off the slot floor. Kind of like an
13 ATM.

14 Admittedly that's different than what the
15 Seminole Tribe offers, but we have to operate
16 within 551 within Florida law to try to provide an
17 opportunity for you all.

18 MR. CALABRO: But, Lou, that's according to
19 current 551. Will there be any amendments that
20 the Commission would submit to the legislature to
21 make it so that it could be a law change that
22 wouldn't be -- think about what we're saying.

23 So the slot machines where Bill is, but, you
24 know, the ATM is where Adam is. So I can walk
25 over there in Hialeah and load my money where Adam

1 is, and then I can walk over here and play. But
2 at Hard Rock I just walk over there and play. So,
3 perhaps, perhaps -- and I don't mean to be so
4 oversimplified -- there might even need to be an
5 amendment that the Commission tags onto a gaming
6 bill. And I know that is a mountain of a task, I
7 get it. But there might be a legitimate need for
8 that for logical reasons, so that it is simply
9 very similar to our competitors and the 25 other
10 states that have cashless. You know what I mean?
11 It would be weird -- it would be odd to me, just
12 one guy's opinion that all the places in the
13 country have it the way that Seminole have it, or
14 you have go over to Adam's ATM over there and then
15 come over to the slot machine. That would be odd.
16 Let's put an amendment in.

17 And I know that people -- that everybody
18 shudders, myself included, when you have to now,
19 you know, tag on to some bill that hopefully gets
20 passed, it doesn't get passed. But that's really
21 what I'm looking for because I -- I respect the
22 fact that there will be some kind of, you know,
23 workaround, but the workarounds are awkward for
24 customers.

25 And you know what happens? The State loses

1 revenue, because the customers come in and say,
2 "That's pretty weird. I'll just go over to the
3 Seminoles," and then we lose revenue, you lose
4 revenue. So there's a reason for the State to
5 kind of understand that concept in my opinion.

6 MR. TROMBETTA: Let me just tackle the first
7 part. What we're trying to do is provide some
8 type of product that you can incorporate into your
9 business without changing the laws. Like you
10 said, changing the laws is essentially not the
11 purpose of this meeting. It's something that's a
12 whole different animal, like I said.

13 MR. MARSHMAN: I have a question for you.

14 MR. CALABRO: Sure.

15 MR. MARSHMAN: Your questions the first time
16 were well met about crawl, walk, run. From your
17 perspective and everyone else's perspective in the
18 room, is the removal of that restriction part of
19 crawl, walk or run?

20 MR. CALABRO: You know, I'm okay for crawling
21 the first year, but if we're running in six years
22 from now, it's really bad; but if next year we're
23 running, that's okay.

24 In other words, crawl, walk, run has to be a
25 process that can't be something that takes years

1 and years and years, because you've lost the
2 advantage of having cashless. Because the
3 perception of the customer in the South Florida
4 market has already been entrenched.

5 Every day that so when we start with the
6 crawl, just, you know, the previous conversation
7 we had this crawl, walk, run conversation, but you
8 start with the crawl, if you don't get to the
9 running end game quickly, you create a perception
10 amongst customers and it's going to be almost
11 years and years and years to undo that perception
12 even though it's five years later, you change it,
13 but oh, yeah, that's still -- half the customers
14 don't know or half the customers don't know. It
15 takes them forever to find out.

16 So I'm okay -- I'm okay with whatever we can
17 do within the fences. Don't get me wrong.
18 Understand we got to get to the run a little
19 sooner than -- as soon as we can.

20 MR. TROMBETTA: Thank you.

21 Gabe.

22 MR. BENEDIK: Gabe Benedik, GLI.

23 So we discussed internally, electronic
24 payment systems without actually having to make a
25 law change in 551, and we looked at the funds that

1 would be available in terms of, okay, what can you
2 work with as opposed to what can't you do right
3 now under the statute.

4 Right now funds could be in an electronic
5 payment system. You can use ACH transactions,
6 which are through a bank account. Figuring out
7 the system is something different but in terms of
8 what can be made available immediately in terms of
9 not having to go and change the law as well as
10 acceptable digital wallets which would be
11 ApplePay, PayPal, et cetera.

12 So that's just something to consider and
13 think about in terms of as you craft rule change
14 or something, that you don't have to dive into 551
15 to make a statute change which is going to be a
16 lot harder in terms of defining the electronic
17 payment system at least having options immediately
18 to offer to the operators, suppliers, and so
19 forth.

20 MR. TROMBETTA: Thank you.

21 MR. MARSHMAN: For the record, this is Ross
22 Marshman asking a question in followup if I may,
23 for the acceptable digital wallets you may have
24 identified, either today or in any comments that
25 you submit in the future, can you expound upon

1 that, please?

2 MR. BENEDIK: We will be written comment.

3 MR. MARSHMAN: Thank you.

4 MR. TROMBETTA: I saw someone.

5 MR. MARTINEZ: Juan Martinez with JBL
6 Systems. I'm formerly the vice president of
7 operations for Seminole Hard Rock. I just want to
8 touch on what Gabe and Steve mentioned as far as
9 what the main competitors do and the systems
10 that --

11 MR. TROMBETTA: Could you speak up a little
12 bit, sir?

13 MR. MARTINEZ: The systems you have on your
14 floors today are, for lack of a better word, ready
15 to go to deliver cashless gaming. And that's your
16 player tracking system be it from Bally, be it
17 from IGT, be it from Konami. I don't believe
18 there's a question about how you get to that point
19 in terms of delivering this experience because I
20 would love for everyone in here to get this sooner
21 than later, is, as Gabe talked about, a wallet.

22 There's some semantics about funding
23 something on the casino floor, but if your player
24 tracking card today which already has the KYC on
25 it, you already have a PIN number. You already

1 transfer free play, which is just another form of
2 a fund transfer.

3 The systems would track all this, but the
4 infrastructure is there today for the crawl phase
5 using your existing player tracking system, PIN
6 number, and the wallet that Gabe mentioned. And
7 the wallet can be funded in the parking lot. It
8 could be funded at home. And because the wallet
9 serves more function than just the slot machine, -
10 I'm going to buy coffee over here, I'm going to
11 buy food at the restaurant, think of it as an
12 entertainment wallet, and that may make it easier
13 to fund it on premises. It's a multifunction
14 wallet that already has the KYC behind it that
15 you're probably looking for.

16 MR. TROMBETTA: Thank you. Adam, you go
17 first.

18 MR. HERITON: Adam Heriton. It's one thing
19 to expand on what Juan and Gabe and Steve said,
20 with my experience with wallets and the cash
21 called wallet that we provide, in my experience,
22 all wallets going back to the KYC point that Juan
23 made, everybody that has a wallet is rated. So
24 the KYC -- when I say rated, that means it is
25 linked to a player account. So you really have a

1 greater grasp on rated play, player behavior as
2 opposed to an unrated cash customer.

3 So I think the KYC element is organically
4 done as opposed to chasing down cash when you
5 can't pin it to a player.

6 One of the enlightenments of my journey on
7 learning cashless and going through this process
8 is that the compliance, the revenue are
9 functioned. The casino functions that ensure that
10 we're following Title 31 anti-money laundering and
11 accommodating the statutes are in line because the
12 player is a known player to the operator itself.

13 MR. TROMBETTA: The last point you made is
14 one that we've been trying to figure out. I may
15 have asked this. Who is actually responsible for
16 the BSA stuff, the Title 31 stuff or reporting
17 suspicious activity? Is it the company that holds
18 the wallet?

19 MR. HERITON: The property.

20 MR. TROMBETTA: Okay.

21 MR. HERITON: So in a transaction of my -- if
22 we do a cash advance transaction, there are
23 processors and there are controllers. And maybe I
24 got that word wrong so I apologize, but there are
25 two parties in that. One party is the person who

1 is actually transacting that data. And in my
2 instance, that would be every.

3 But then there are the other parties or the
4 casino operator that are the people that are the
5 people that are responsible for retaining that
6 data or taking on that data. And then they fall
7 in the same line with what their protocols are for
8 protecting PII and PCI.

9 From the transacting element where that's the
10 actual transacting occurring, whether it be a
11 wallet transaction or a cash access transaction,
12 that data and that responsibility for that
13 transacting element is the responsibility of
14 whoever the transacting party is.

15 So I would say about 80 percent of the
16 transaction, responsibility falls on the owners to
17 the operator, and then the real small portion is
18 the transaction that goes across from account to
19 player account or back is responsible of the
20 person who is executing that wallet.

21 MR. TROMBETTA: Okay.

22 MR. HERITON: And we can provide greater
23 clarification if there needs to be greater clarity
24 for this.

25 MR. TROMBETTA: This isn't a shot, Adam.

1 I've heard other things because this is a question
2 I've been trying to get answered. Does anybody in
3 the room have different -- know of an example of
4 where somebody else is responsible? Because I've
5 heard that essentially the facilities can enter
6 agreements with the people providing the wallet.
7 The wallet company is also responsible. Does
8 anybody know if that's also the case?

9 MR. BENEDIK: Gabe, GLI. So ultimately this
10 is a policy decision. This isn't something you go
11 to the industry and say, "Hey, what do you guys
12 think?" This is something that you would
13 internally have discussion on and ultimately make
14 policy decision. You could put the onus on the
15 actual gaming property themselves or the
16 third-party service provider.

17 MR. TROMBETTA: Thank you.

18 MR. SCHLAFFER: Paul Schlaffer, Hialeah Park.
19 So it's my understanding that in terms of a
20 responsibility, that's going to -- at the end of
21 the day, that's going to fall onto the property.
22 So even if there was some functions that were
23 allowed to be done by a processor, the ultimate
24 accountability in terms of the wallet, if
25 something goes wrong, it's going to fall onto the

1 property.

2 So to reiterate what the previous gentleman
3 from Seminole said, integrating that into a player
4 tracking system that solves that issue because
5 they don't want to actually track the customer
6 because everything is falling into our systems.

7 MR. BASILE: Sam Basile with GeoComply. I
8 just want to reiterate. It really isn't a policy
9 consideration. The Bank Secrecy Act makes it very
10 clear. It defines a financial institution having
11 that responsibility. Now it might be shared
12 between the one financial institution that's doing
13 the transfer, but ultimately the casino and the
14 gaming establishment over a million dollars is
15 defined and included under the definition of
16 financial institution. And for that reason, under
17 federal law it's the property.

18 MR. TROMBETTA: Okay. Thank you. Any
19 other -- well, go ahead.

20 MR. BLAND: It's Patrick Bland, CTO of Acres.
21 So we've been building kind of a new version of a
22 cashless gaming system. We've been going to
23 market over the last two and a half years. And
24 just for context, we've installed our technology
25 on 31,000 slot machines in about 13 jurisdictions

1 kind of doing things a different way.

2 And, you know, the gentleman from the
3 Seminoles had mentioned that everything is kind of
4 tied to the player loyalty account, right, that
5 funding has to go through that and that's
6 typically -- traditionally been viewed to get to
7 the slot machine. The way that we kind of brought
8 our technology to market is a cashless wagering
9 system which I think is a loaded term in this
10 industry, just the like the term wallet is a
11 loaded term.

12 The cashless system that we provide -- if
13 you'll look at the Missouri regs, they updated
14 their regs probably last year. And I can submit
15 all this. They just called their cashless system,
16 the cashless system. There's no wagering
17 happening on the cashless system.

18 It's literally a value transfer mechanism to
19 take funds from a patron's source to put them on
20 the slot machine. And in terms of the Bank
21 Secrecy Act, the way that our technology works,
22 there could be a virtual card session or a
23 physical carded session where all that tracking is
24 done.

25 But kind of coming back to the whole point of

1 this, we don't want to have to go change the regs
2 or the statutory language because that's a
3 mountain that takes a lot of time. Just based on
4 that interpretation of it, there might be some
5 wiggle room in how the electronic payment system,
6 the electronic credit systems are used in the
7 statutory language because my understanding of the
8 other jurisdictions that we're deployed in, this
9 is kind of nuanced to Florida, but it doesn't
10 necessarily disclaimer or prohibit this kind of
11 different cashless technology.

12 MR. TROMBETTA: Thank you. Anybody else have
13 just general --

14 MR. MARTINEZ: Question for that gentleman.

15 MR. TROMBETTA: Could you identify yourself?

16 MR. MARTINEZ: Juan Martinez, JBL Systems.
17 What you described is cashless wagering system,
18 direct communication to a slot machine.

19 MR. BLAND: Correct, funded by an external
20 funding source.

21 MR. TROMBETTA: Yes, Adam.

22 MR. HERITON: I think it would probably do
23 some justice to, maybe not give your secrets to
24 us, but kind of tie in how you integrate into a
25 KYC element there. Are you able to disclose that

1 at all?

2 MR. BLAND: Yeah, so the way that our system
3 works, we're purely transactional, right, so we
4 utilize a digital wallet provider like an Everi,
5 like a Sightline, like a Coin. And I'll talk
6 through the basic enrollment process that PIN has
7 for all their cashless because we're powering all
8 their cashless in all their states that they've
9 got it employed at.

10 You have your kind of level-one KYC just to
11 get a loyalty card. So you go to the cage, you
12 have your loyalty card, and that's how they know
13 who you are.

14 With Everi, with Sightline, with all these
15 other providers, there's an additional layer of
16 KYC that they are doing to establish a wallet
17 limit. I know Everi is a little bit different
18 than Sightline.

19 When a patron enrolls through the mobile app,
20 and this all be done in five minutes, so they can
21 set up -- the patron has a -- basically it's a
22 bank account with Everi, right, so they've done
23 that second tier of KYC to establish a wallet size
24 of \$10,000. I think that's kind of the default
25 size, but the merchant has the ability to control

1 down.

2 So if the casino says, "No, no, we don't want
3 people being able to transfer \$10,000 into their
4 PIN wallet or digital wallet," all right, they can
5 say, "Okay, \$3,000 is going to be your daily
6 transfer limit." And one of the nice things about
7 the wallet providers, you know, through the Everis
8 and Sightlines of the world, it comes down to the
9 physical protections and responsible gaming.

10 If you look at some of the regulatory
11 language out across the states, the transfer
12 limits are pretty much the only thing. So if a
13 patron sets a transfer limit for a debit
14 instrument for \$1,000 a day, they could do \$31,000
15 of transfers for that specific debit instrument.

16 So there's a firewall within this kind of
17 wallet ecosystem that they set weekly transfer
18 limits based on the maximum limit applied by the
19 operator, monthly limits applied by the operator
20 so there's another layer of fiscal protections for
21 patrons as part of that.

22 MR. TROMBETTA: Thank you. Any other general
23 comments before I start going through the
24 questions? Any questions on my side here?
25 Anything? Followup?

1 MR. CALABRO: I have a question. Steve
2 Calabro, Hialeah Park.

3 Earlier, the current statute doesn't allow,
4 assuming that KYC and the BSL we get through that,
5 we can do that by just rating everybody. So is
6 your concern as a commission looking at the
7 current Florida Statute that the statute -- and I
8 don't know the specific words -- but it says you
9 can't have credit card transactions at a slot
10 machine. Is that the concern?

11 Because it's not like you're having -- it's
12 not like you're inserting a credit card into the
13 slot machine, you have this insulation between the
14 credit card and the slot machine and that is the
15 wallet. And so it's -- the transaction isn't,
16 take your credit card out as you would do at a
17 vending machine or a parking meter and put it into
18 the device. You're doing it on the, potentially,
19 the eye view of the slot machine which is not the
20 slot machine. A slot machine can operate without
21 an eye view, yeah, with some work nowadays.

22 So there's this intermediate -- earlier you
23 said, "Wow, the statute says, you can't have slot
24 machines on a casino floor." Is it really you
25 can't have slot machines into the device of the

1 slot machine, you can't have credit cards into the
2 device of the slot machine? And if that's the
3 case, you're not really doing that. You're
4 putting it into the wallet which is this in
5 between the credit card and the machine.

6 Is that suffice in giving the Commission some
7 level of comfort that it's not a transaction that
8 is being -- occurring at the machine, but it's
9 happening in between the machine?

10 MR. TROMBETTA: So I'm going to start, and
11 then I'll probably turn it over. But we have --
12 okay.

13 To answer your question directly, we're
14 trying to figure that out. Essentially so
15 551.121, there's three, I guess, the subsection
16 with the paragraphs, there's three sub -- three --
17 whatever the right legal term is that we worry
18 about. It's essentially two, three, and four, so
19 essentially 521.121, sub three -- two, three, and
20 four. And they provide limitations on the type of
21 transactions that can occur at a slot facility.
22 One of them, like you said, is no credit or debit
23 transactions. That's what it says.

24 So we're trying to figure out if -- how -- if
25 I can sit there with a wallet, like ApplePay.

1 ApplePay is kind of mirroring my credit card. If
2 I just go up -- is that a -- how does that work
3 with the statutory limitations is what we're
4 trying to figure out.

5 I personally believe, what you just said
6 that, on its face, it means it can't be a gas pump
7 where you insert your credit card or swipe a
8 credit card. I'm a lawyer. Bunch of lawyers up
9 here. You guys all work with lawyers. I think
10 you understand the fear here is that the statute
11 doesn't say specifically that. We're trying to
12 figure out exactly that.

13 I'm going to turn it over to Ross to clean
14 this up, but we're specifically looking for any
15 information you have on, this is not a credit card
16 transaction, I think it would be helpful, but for
17 other people that are interested in this matter.
18 Ross, anything you can add on this or to strike in
19 what I say?

20 MR. MARSHMAN: Nothing to strike for sure,
21 but Lou is right. This is devil in the details
22 and you're hitting on one of the points that we're
23 trying to nail down. And the representative from
24 GLI already made a statement that, at least he and
25 his team have identified acceptable ways of having

1 a digit wallet. My understanding of a digital
2 wallet at this point is you can have a credit card
3 funding a digital wallet, and you would,
4 potentially, in a cashless wagering system use
5 that wallet to fund your EPS and the EPS goes into
6 the ECS, make the wager, and it goes back through
7 the ECS, and all that stuff we can talk about
8 later as we go through the questions.

9 So your question is something on the
10 forefront of our minds, and there is a discussion
11 on, is there a difference between credit and a
12 credit card? Is the statute worried about the
13 piece of plastic or is it worried about the idea
14 of the credit transaction? So is it, what it is
15 designed to represent that the legislature is
16 concerned about or is it the piece of plastic that
17 your players are going to have in the wallet? I
18 think the statute is clear, like Lou said, you
19 can't use it like a gas pump and just put the
20 credit card in and take the credit card out.

21 Is the legislature -- what is the legislature
22 contemplating when they write credit card or debit
23 card or check? Electronic check does not appear
24 on the face of Chapter 551. ACH does not appear
25 on the face of Chapter 551. But we all know just

1 as much as you all know that the statutes only say
2 so much and then the industry does everything
3 else.

4 So just to reiterate the point I made earlier
5 to the specific commendator, if there are anything
6 else that we should be looking about or thinking
7 about this differently, tell us, because I
8 personally don't want to be in a situation where I
9 don't even know that I don't know something. That
10 would be horrible for me. So please keep that in
11 mind as you consider these comments and in your
12 written submissions, if any, thank you.

13 MR. TROMBETTA: Start.

14 MR. BLAND: Recovering attorney, Patrick
15 Bland for acres. So you know the -- what is it,
16 551, 121.6 and 102.9, right, specifically mention
17 credit card, like the physical card or debit card.
18 If you look at other gaming states with cashless
19 regulatory frame works, it's not called card --
20 kind of skin it as a debit instrument because I
21 think when the regs were written in the early
22 2000s, in order for a slot machine to process a
23 debit card or a credit card, it literally needed
24 to be optioned as a point-of-sale system, which I
25 think nobody in the United States did. I think in

1 some other foreign countries that was more of a
2 thing.

3 And so some potential wiggle room around the
4 physical -- plain language of the statute, right,
5 as a card, right, it could be a debit instrument
6 which is how we've gotten through a lot of
7 regulatory jurisdictions with Everi, right, where
8 prepaid access is -- and it's not even a
9 gaming-defined term. I think it's defined by
10 FINRA or FinCEN. There's a whole notion of
11 prepaid access.

12 Some jurisdictions have a debit instrument
13 where a prepaid access instrument is included in
14 the definition of a debit instrument. One
15 potential thing to think about as you guys are
16 kind of marinating on this feedback, right, that,
17 you know, a debit instrument might be allowed per
18 the clear language of the text because it's not
19 the card itself.

20 MR. TROMBETTA: That's sort of my thought --
21 my thought process right now is essentially it's
22 just a card. I think there's room here to try to
23 make it work. On this point, any feedback would
24 be helpful.

25 Adam, I saw you had your hand up again.

1 MR. HERITON: Adam Heriton. He essentially
2 took the words out of my mouth, a debit
3 instrument, a payment funding source or a unique
4 patron credential, something of those languages
5 would be able to kind of align with how the way
6 the statute is written today. Those are different
7 adjectives or different descriptions that I would
8 consider looking into.

9 MR. CALABRO: Steve Calabro. So I have one
10 more thing for you. The State sort of does
11 something, where -- currently, right now and the
12 governor signed off on it. If I take this phone
13 and I have -- we have an agreement with the
14 Seminole Tribe on sports betting, right, so if I
15 sit on the Hialeah Park floor in front of a slot
16 machine, I can take my credit card out or I could
17 know the numbers of the credit card, and I could
18 load my wallet right there on the floor.

19 But I'm not really loading it into a
20 device -- I'm loading it into my own phone, but
21 I'm not loading it into a gaming device. So,
22 technically, right now, I could go to Pompano
23 right now, be on a casino floor and sit there and
24 buy -- be in the state of Florida and the governor
25 signed it and Compact and all the cool laws behind

1 it and just load my wallet, put 500 bucks into my
2 sports wallet, and then wager.

3 MR. TROMBETTA: And when you say "wallet,"
4 you're talking about the Hard Rock sports app?

5 MR. CALABRO: Yeah. It's sort of
6 happening -- it can happen right now at some
7 version, slightly different, on a gaming floor
8 right now. I can go through it right now.

9 So that might give you some comfort in
10 allowing that the wallet provides this value. The
11 wallet because it's not inserted into the gas
12 pump. I think that gas pump is a good analogy.

13 MR. TROMBETTA: Thank you. Any other general
14 comments? So first question, what's an electronic
15 payment system? Anybody have any feedback
16 specifically on this question? Separate from
17 what's already been said.

18 B, what's an electronic credit system?

19 MR. BENEDIK: Gabe Benedik, GLI. Just for
20 reference, as you do your research, and I'll send
21 these in written comments as well, which is just
22 for awareness and visibility for the rest of the
23 people in the room. You can look at New Jersey.

24 New Jersey has a definition for electronic
25 credit. They define it as an electronic credit

1 means an electronic signal or transmission which
2 is generated by a device contained in or connected
3 to a slot machine which is initiated by a player
4 as a means to operate the play of the slot
5 machine.

6 Again, that's in New Jersey, and I'll have
7 that written comment which you can reference that
8 to do your research, but that's one example of a
9 definition as you kind of look at ways of defining
10 credit systems. That's what we do in terms of our
11 research, too.

12 MR. TROMBETTA: Thank you.

13 Okay. C, who would own, manage, operate or
14 otherwise be responsible for cashless wagering
15 systems?

16 Before I get there, the origin here is trying
17 to figure out the relationship between kind of the
18 wallet providers and the casinos.

19 MR. HERITON: So typically it's -- the way
20 we've been doing this in the other jurisdictions,
21 like we're a licensed manufacturer in the state,
22 right. So we maintain the regulated system
23 boundary, right, so Everi has been arm's length
24 away because Everi has kept the alphabet soup of
25 all the financial regulatory stuff that they have

1 to do from a state and federal level and triple C
2 and FINRA, and I have no clue.

3 But typically that's, you know, where the
4 regulated system boundary kind of ends. It's the
5 cashless wagering system. You got the floor base
6 monitoring systems. Those are kind of the two
7 main things that are controlled code that go
8 through the GLI or B and M testing, that sort of
9 thing.

10 MR. HERITON: And just to add on to what he
11 was saying, Everi has what's called money
12 transmitter licenses which allows us to transact
13 on those behalfs. So those are what essentially
14 make Everi a financial transacting financial
15 services institution also known as a bank or
16 processor on behalf of gaming institutions
17 domestically.

18 MR. MARSHMAN: This may be putting the cart
19 before the horse, but something that we're going
20 to have to consider in the future is the type of
21 licensing that would be required for the provider
22 of a cashless wagering system. We have current
23 rules in place already for service providers of
24 slot machines. Something to keep in mind there as
25 well, I think.

1 Again, that's further down the road than
2 where we are now, but it's something that came to
3 mind based on these comments now based on the
4 statements that you might have to be licensed in
5 other jurisdictions. I think right now, under our
6 existing rules, it would be reasonable to expect
7 that even under our current rules, the provider of
8 cashless wagering systems would have to be
9 licensed by the Florida Gaming Control Commission.

10 MR. MARTINEZ: Juan Martinez, JBL. If the
11 infrastructure remains with all the components we
12 have on your floor, which would include Everi's
13 banking infrastructure and/or ATM network or NRT
14 and/or ATM network, would those companies -- would
15 they need to get re-licensed if they operate today
16 on your floor following all of the required
17 banking regulations?

18 MR. TROMBETTA: I don't think they would have
19 to get re-licensed. I don't think that's a
20 surprise to anybody. I think that we're looking
21 as anybody providing this wallet would also have
22 to have a license.

23 MR. MARTINEZ: I'll withdraw my comment on
24 that.

25 MR. MARSHMAN: My only feedback on that is,

1 it's going to depend. It depends on the entity
2 that we're going to be dealing with and their
3 previous relationship with the State.

4 MR. BLAND: Patrick Bland, Acres. Right.
5 Some other jurisdictions will have different
6 categories of licenses, right. So us as a
7 manufacturer, we're creating the associated
8 equipment that's sitting on the floor. Las Vegas
9 is not a state, but Nevada has a cash access in
10 wagering instruments service provider license that
11 the service providers end up going through so
12 there's other jurisdictions to look at.

13 MR. TROMBETTA: Thank you. D, so this is --
14 kind of goes to something we already talked about.
15 What are the permissible funding sources for
16 cashless wagering systems? For example, credit
17 cards, debit cards? Anything on this? If you do
18 want to respond about, like, the instruments or
19 any other methods of funding that you're aware of
20 that I guess we should consider, I think would be
21 helpful here. Any comments on this one?

22 MR. SCHLAFFER: Paul Schlaffer, Hialeah Park.
23 Just as a general comment as I mentioned in the
24 first meeting, I think ACH is something we can do
25 on the floor or, you know, right away. Anything

1 beyond that I think we're forced to go off the
2 floor. So just like we do have cash advance
3 services, you know, off the floor, then those
4 transactions -- I could still see us loading those
5 into a wallet, but those transactions would have
6 to occur off the casino floor.

7 MR. TROMBETTA: Thank you. Anything else?

8 MR. HERITON: Adam Heriton with Everi. We
9 have begun to introduce funding sources which
10 utilize subscriptions: i.e., PayPal; i.e.,
11 ApplePay. So there may not be a physical
12 instrument or a card associated with somebody's
13 pre-established account, but they are able to
14 access. So we have additional funding sources
15 which include Apple, PayPal today.

16 We are exploring entry into a limited crypto
17 environment, but I know that's kind of a tricky
18 term these days in this world. Other than that,
19 ACH or eCheck as well.

20 MR. MARSHMAN: I have a followup question on
21 that. You said subscription model.

22 Can you expound on that, please?

23 MR. HERITON: So with my PayPal, and I
24 apologize for the poor verbiage I'll say, my
25 PayPal account -- if I were to access a PayPal

1 account and establish a PayPal account within
2 Everi, I use a sign-on and a password that
3 directly links to my checking account. So I don't
4 really have a debit card attached to my PayPal
5 account. I just have a sign-on that links to my
6 debit account. If I want to draw money down, it
7 goes through my PayPal account, draws to that
8 account. So we are integrated with PayPal. So
9 when I say a subscription account, it's generally
10 that it doesn't have a check or a checkbook or a
11 credit card associated with that. You just have a
12 subscription where you, I guess just kind of pass
13 money through, through that service.

14 MR. MARSHMAN: Thank you.

15 MR. HERITON: Yes, sir.

16 MR. TROMBETTA: Anything else? So, again,
17 sort of discussed this where we are here. We're
18 trying to figure out how funds can get into the
19 system. You just mentioned this too about -- and
20 this really goes to those limitations, those three
21 that I pointed out is, how can players get money
22 in and where is sort of the question here.

23 MR. MARSHMAN: I think, Mr. Schlaffer, you've
24 already kind of hit on that already in that
25 there's going to be certain types of transactions

1 you can do immediately on the floor and then there
2 may be some restrictions geographically speaking
3 that have to take place outside of the floor.
4 From what it sounds like, that can be -- I think
5 you term was folded into the wallet. So that
6 wallet can have the multiple funding sources, some
7 would be available on the slot machine gaming
8 floor, some would have to be elsewhere; is that
9 fair to say?

10 MR. SCHLAFFER: Yes. And just an additional
11 thought process as we're going through that, so,
12 like, right now you can have a credit card
13 associated with your wallet in Rythorn, right, so
14 you can go ahead and you can buy an item on that.
15 Well, that really doesn't change where the funding
16 source is. So in this system, again, if we're --
17 if the customer is utilizing a debit card, check
18 or credit card, I envision them as having to
19 transfer those funds into the specified account
20 versus having just that linked because otherwise
21 it's basically -- it's the same thing. You're
22 having a credit card or a debit card transaction
23 that's occurring that's occurring within that
24 area, if that makes sense.

25 MR. MARSHMAN: Thank you.

1 MR. BLAND: I printed out some kind of
2 graphical flows. I didn't know if there was going
3 to be a presentation. Could I share that with you
4 guys? I think it might help facilitate, but I
5 definitely did not print enough for everybody
6 here. This will be part of the record that comes.

7 MR. TROMBETTA: Even if you give it to us
8 now, we can incorporate it into the record.

9 MR. MARSHMAN: I think we're happy to take a
10 look at it now so we don't spin our wheels, but to
11 make sure everyone here knows what we're looking
12 at since we don't have any copies.

13 MR. BLAND: I'll just keep it and --

14 MR. MARSHMAN: It has to be provided to us,
15 preferably in electronic form so we can make that
16 available after the fact to everyone else so their
17 comments based on what you're presenting us that
18 maybe only I can see right now. They may have
19 some feedback that they didn't have in the moment.

20 MR. BLAND: Understood.

21 MR. TROMBETTA: If you want to bring it up.

22 MR. BLAND: Sure, sure. We're talking about
23 wallets and transaction flows.

24 MR. MARSHMAN: For the record, while we're
25 reviewing it and for the sake of the people that

1 are here, can you describe generally what this is
2 designed to represent?

3 MR. BLAND: Yeah. So basically what this is
4 showing is a wallet transaction flow like we've
5 deployed in 13 other states, right. And then a
6 traditional kind of debit instrument transaction.

7 MR. MARSHMAN: So would you describe kind of
8 what we're looking at?

9 MR. BLAND: Sure. So the bottom wallet
10 transfer flow is what we're talking about. Sum it
11 up, the patron has the external financial sources
12 whether it be, if it's PayPal or Venmo or Zelle,
13 maybe Zelle. But essentially the wallet they
14 establish, it's managed and owned by the wallet
15 provider. They can transfer funds in and out of
16 that wallet provider and just because they're in
17 the wallet doesn't necessarily mean that they are
18 on the slot floor, right, in the game, because
19 those wallet funds could be used for food and
20 beverage, retail, all sorts of other things at the
21 property.

22 So it's kind of a firewall, right, if you
23 will, from a gaming perspective. Those funds are
24 transferred from the wallet that have been prepaid
25 in advance.

1 MR. TROMBETTA: Thank you.

2 MR. MARTINEZ: Juan Martinez, JBL. The
3 points made earlier to Hialeah, to remain
4 competitive, I honestly think you have to explore
5 both routes, which is delivering funds through the
6 existing player tracking system. But I will tell
7 you that Seminole has 13,000 Bluetooth card
8 readers already installed on their slot machines.
9 So the direct-to-device concept that Patrick
10 described could be turned on at a moment's notice.

11 So you really need to consider using what you
12 have today, but certainly explore the option of
13 pay-direct, phone tap, Bluetooth, NFC-type of
14 transfer to the game to remain competitive.

15 MR. BASILE: Sam Basile with GeoComply. The
16 second question in E is what I want to address and
17 that is, with the location of the patron matter
18 when funding the cashless wagering system, just
19 because we're a geolocation company, you would
20 think we would say, "Yes, it does." But here's
21 why it does in order to educate about the Bank
22 Secrecy Act and the Office of Foreign Asset
23 Control.

24 There is an obligation when to block
25 transactions by financial institutions from Iran

1 and other countries, and to then report that to
2 OFAC itself. So the location of the funds and the
3 casinos and the racinos here have that obligation
4 because what we're doing now is, we're now
5 allowing this phone device to take the place of
6 the cage and everything else.

7 A player walks up to a cage, you know, and
8 could fund their account there. And then take
9 their card, and then do the password at the slot
10 machine, and then could access those funds. The
11 person is physically there and you can track that.

12 Now when you say that anywhere, whether in
13 the parking lot or in the, you know, outside of
14 the gaming floor, they can fund, the question then
15 becomes, what is happening on this device.

16 And that's the problem, slot machines right
17 now have to come in a sealed truck. The software
18 has to be set separately, has to be inspected by
19 your division itself. You don't inspect what's
20 happening on this phone and that's the problem
21 because a VPN could be running on this phone.
22 Remote desktop software could be running on this
23 phone.

24 My account could be taken on the dark web,
25 put into another device somewhere outside the

1 United States in an OFAC-sanctioned country and
2 start funding and/or withdrawing those funds. So
3 the location and detection of that location I
4 submit is going to be very important to protect
5 consumers, to protect the casinos from that. I
6 mean, it's a combination of anti-money laundering
7 rules and accommodation of compliance with the
8 OFAC sanctions scenario.

9 So that's why there is the need to do a
10 simple geocheck and see what's happening. When we
11 do a geocheck, it's not just looking at where the
12 device is located utilizing all kinds of different
13 sources. This phone can detect Bluetooth. It can
14 detect GPS. It can detect WiFi. It can detect
15 all sorts of things. And in addition, it can
16 detect whether or not there is remote desktop,
17 there is a VPN and block those things. And that's
18 what we're providing for the Seminole Tribe right
19 now on a statewide basis since we're their
20 geolocation system on that and block those things.

21 But here's the other reality, if those things
22 get blocked, you know, those transactions, the
23 casino then has 10 days to report on that blocked
24 transaction. So they've got to know about it,
25 detect it, block it, and then report it to OFAC

1 itself. So there is those additional obligations
2 that are coming as a result of this because these
3 players can fund remotely. And that's really the
4 difficult thing.

5 Now, the good news is, all that can be
6 detected, those can be blocked, that information
7 can be passed on, and the casino can then, you
8 know, fulfill its obligations under federal law.
9 But that's why I wanted to emphasize that that is
10 going to be a problem because we already blocked
11 those transactions now for the Seminole Tribe and
12 worldwide detections.

13 There's other aspects about foreign
14 transaction funding, and not necessarily blocking
15 those but when a foreign transaction is happening,
16 it has to get reported. Well, if you're not
17 detecting the location, then you've missed that
18 reporting obligation.

19 MR. HERITON: Adam Heriton, Everi. Very good
20 points. Thank you.

21 There are other elements within the CashClub
22 Wallet that Everi provides that give you a pretty
23 detailed rundown of transaction history, patron
24 profile. So within our ecosystem we try to
25 prevent a lot of stopgap and measures to give

1 patron autonomy for their own compliance and their
2 own recognition of bad actions on their account.
3 So that's first and foremost.

4 The second thing I wanted to also mention, he
5 mentioned foreign transactions. At this point in
6 time, I do not believe, and I will make sure that
7 we put it in our submission prior to 2-12 that we
8 accept foreign transactions with our CashClub
9 Wallet to date.

10 MR. TROMBETTA: You do or do not?

11 MR. HERITON: We do not, except for foreign
12 transactions with CashClub Wallet to date. That
13 may quell some of those concerns, but I will put a
14 formal response back to -- because I think number
15 E is a very big portion of this discussion. Thank
16 you.

17 MR. HIRSCH: Mike Hirsch from IDT. Just to
18 remind. Some of you has a cashless wager app and
19 KYC-identified so you know who that person is, so
20 it's maybe less likely that they're, you know,
21 they're there to launder money or do some other
22 bad things, because there's other ways to launder
23 without identifying yourself to the casino.

24 MR. BASILE: Sam Basile, GeoComply again.
25 Someone from KYC, get their ID and credential

1 stolen, then log into your cashless account from
2 outside the US, if you're not checking on that,
3 and still fund from those sources.

4 KYC is important, and geolocation during KYC
5 and afterwards. And what we're submitting is,
6 simply do a GeoCheck at deposit. Do a GeoCheck at
7 the time of the withdrawal. Why? Because account
8 takeover is another real aspect here. Where what
9 I've described is that someone could get their
10 credentials stolen, sign up for the Hard Rock
11 wallet -- no, sign into the Hard Rock wallet and
12 proceed to -- for the whole purpose of depleting
13 those funds and transferring them to a different
14 account.

15 How do you detect that? How do you block
16 that? One-device fingerprinting. These things
17 all have unique ID. They have, you know, specific
18 qualities that are happening at that device. When
19 that is detected and looked at at the time of
20 withdrawal, that could be blocked.

21 At time of actual login with the same
22 credentials, if it's determined now that
23 information is different based upon all kinds of
24 patterns, because what we can be doing is we could
25 give the operator a whole history of where and

1 when they have funded these things, and what
2 device they have done.

3 Once we detect some type of different pattern
4 and a different device in a different location, we
5 can flag that and let the operator put a pause and
6 look into that further to make sure that these
7 funds are not being hacked itself. And so
8 that's -- that really is the real-world scenario
9 that we're blocking and protecting online gaming
10 operators right now.

11 MR. MARSHMAN: I have a question based on
12 some of the comments that we've heard recently.
13 We are not going to be regulating the phones,
14 you're correct. So I can see where geolocation is
15 going to be an important part, but the phone
16 itself, going over what Mr. Martinez brought up
17 earlier, there may be a cashless wagering system
18 in your operations in the future where you put the
19 phone up to the machine, your phone communicates
20 for lack of a more sophisticated term, with the
21 machine, and information goes back and forth
22 through the EPS and the ECS.

23 What standards should be in place for that
24 Bluetooth connection? What standards should be in
25 place to ensure the security of that connection

1 with the NFC, the near field? What should we be
2 looking at here? Does it already exist? Is the
3 fact that phone just comes with a Bluetooth
4 connection and NFC sufficient or is there more?

5 MR. HERITON: I think Mr. Martinez can speak
6 a little bit more to that than I can, but I will
7 talk to you on the additional followup to the
8 geofencing. Two answers to your question.

9 I think -- I believe, in order to access the
10 Bluetooth card reader or a card reader or a player
11 card to use the wallet, you would need a four or
12 six-digit PIN that is selected by the customer.
13 So I think that is a -- during the registration
14 process, the select a PIN that is determined by a
15 policy, whatever the PIN length or system
16 requirement or something of that nature.

17 The second element of this is, too, from a
18 KYC perspective, I would probably go on record and
19 say that it's probably a best practice to limit
20 the term of registration. So I wouldn't take --
21 and I think that would have to be a policy set.
22 So if Mr. Basile?

23 MR. BASILE: Yes.

24 MR. HERITON: If he were to sign up for a
25 wallet and he were to sign up for a wallet at a

1 property, that wallet registration would not be in
2 perpetuity. It would have to be a 365-day term or
3 a predetermined amount of term to where that
4 person would have to reregister.

5 So what would that mean? Now, that person
6 would be able to probably access the funds that
7 would remain on their wallet or that they would
8 have access to. But to do another load or unload,
9 then they would have to re-register in person with
10 the club, with the cage or somebody on property
11 that can KYC that person.

12 And there are probably additional
13 technologies that are coming forward that will
14 allow somebody to pre-register with facial
15 recognition and other forms coming down the
16 technological path.

17 MR. BASILE: Sam Basile, GeoComply --

18 MR. MARSHMAN: Hang on. If I can have a
19 moment. It sounds like KYC is obviously going to
20 be a part of all this and it's probably going to
21 work in conjunction with the more technical
22 standards. I'm asking just like nuts and bolts.
23 Like, there's a device that I can purchase online
24 for \$140 called a Flipper Zero. And I can hold
25 that up to my hotel card, and I can immediately

1 make a copy of the hotel card, and I can just put
2 that in my pocket and walk away.

3 There is more advanced technology that I'm
4 only beginning to understand that can intercept
5 the Bluetooth, intercept the NFC and interact with
6 that transaction, take over that transaction, just
7 at a physical level at that machine. So I'm
8 talking just nuts and bolts.

9 I'm in front of this machine. There's a bad
10 actor next to me, and he wants to have access to
11 my account, my wallet, my phone, what sort of
12 standards can we insist upon as part of our system
13 to protect the player data, to protect you all
14 from fraud on your end. I don't know what I don't
15 know. Criminals are very enterprising, and
16 there's a lot of money in this system to be had so
17 a lot of motivation for them to attack every
18 component of this. So I can absolutely see where
19 geolocation is going to play a part. KYC, all of
20 the different flavors of that is going to be
21 important.

22 I'm much more just nuts and bolts right now
23 with that question. Just, how do you protect your
24 customer from the bad actor next to him on just
25 that person-to-person way? Like, there's going to

1 be organized crime, right, targeting gaming as it
2 always had and always will. They are going to be
3 clever and smart about this. And I just see this
4 as being a way in for them to harm, not only your
5 customers, but you yourselves, your service
6 providers, everyone else in your chain can fall
7 apart seemingly because of this.

8 Please keep that in mind as you work through
9 any comments you'd like to submit. If there's
10 preexisting standards and I just don't know about
11 it yet, great. Just point me in the right
12 direction. That's something that we've already
13 been asked. Just nuts and bolts, how are we going
14 to make this work, then how are we going to do
15 KYC, and how are we going to do geolocation and
16 everything else.

17 It all matters. And I don't want to focus on
18 two-thirds of what I need to be looking at, and
19 then this is what screws everything up for us and
20 you.

21 MR. TROMBETTA: Before I turn it over, just a
22 follow-up. I should have started the meeting with
23 this.

24 We do this workshop. The commissioners all
25 read the transcripts, they see everything that's

1 submitted. They have takes. They talk to us
2 individually about what's going on. So the
3 question that we have been asked, I just want you
4 to know, to the people that aren't in this room
5 that also have decision-making in this are very
6 interested in all this. And some of the questions
7 are coming from there, too. All right.

8 MR. BASILE: Sam Basile, GeoComply. Two
9 clarifications, everything that I talked about
10 leading up to your question just now is talking
11 about funding the wallet outside of the actual
12 delivery mechanisms that you're asking now about
13 in terms of taking the funds that are now on the
14 cashless app in that mobile wallet, and then being
15 transferred to the slot machine.

16 First off, the Bluetooth is just a delivery
17 mechanism of actually connecting the phone to the
18 player tracking system so that once those funds
19 are transferred, there's a marry-up.

20 Now, Adam had mentioned about the whole pins
21 and everything else that can take place in order
22 to allow a secondary authentication of those funds
23 transferred. Now, the reality here, just because
24 you brought that up, reality is, is that you could
25 require that the device itself be registered and

1 that if there's a change -- because, you know, the
2 other aspect is, is when a player loyalty card is
3 issued, there's no two-player loyalty cards unless
4 it's a husband and wife based upon some
5 jurisdictions. So you're going to want to
6 restrict the loyalty card and everything else once
7 it becomes onto the device anyway.

8 So there is that that's part of your
9 detection tool. The device fingerprint tool is
10 another detection tool so that fob you mentioned
11 on the Bluetooth can't then go duplicate the
12 credentials, and record on a separate device.

13 Once that separate device goes on, if you're
14 watching for fingerprint ID, that can be locked.

15 MR. MARSHMAN: Thank you.

16 MR. BLAND: Patrick Bland, Acres. Just one
17 point to note that, you know, I don't know about
18 the other Bluetooth kind of card readers that are
19 in the market. When we deploy our technology,
20 right, the actual financial transaction is not
21 occurring over that little Bluetooth piece.

22 There's a whole regulated, secure transfer
23 mechanism that essentially the mobile app
24 initiates a request to Everi, right, that then
25 they send a request to us for us to put money on

1 the slot machine.

2 So in terms of an authentication standpoint
3 of user, they've logged into the casino mobile app
4 through face ID, multi-factor authentication.

5 They've gone to the cage. They've linked their
6 accounts to that profile and that's kind of the
7 security method there. So to be clear, the funds
8 transfer is not happening over a Bluetooth public.

9 MR. TROMBETTA: Anything else?

10 MR. SCHLAFFER: Paul Schlaffer, Hialeah Park.
11 Bluetooth is just -- it's no different than how
12 you're communicating information. That connection
13 should be encrypted.

14 Now we know criminals will eventually have
15 the ability to break an encryption standard like
16 that. Well, the way to protect both the customer
17 transaction as well as the facility or a way to
18 solve that would be to require a one-time pin.

19 So every time that the customer is initiating
20 a transaction -- I think most of us use OTPs in
21 our normal workflow, that that's going to require
22 an ever-changing OTP. Therefore, if that
23 communication is broken, it's not going to work
24 for the second transaction.

25 MR. TROMBETTA: Okay. Thank you.

1 MR. HERITON: Adam Heriton. That's a really
2 great point that Paul just made because the
3 reality of that is, with that -- that -- the OTP
4 is like when you go on Amazon or multi-factorial
5 authentication, if you're signing into your e-mail
6 you have to have a certain code, or this code
7 for -- like, I have one for certain banking
8 accounts.

9 That's a very valid point because that can
10 continuously change, provide an extra layer of
11 security to that patron. And also, I kind of
12 belabor this point, but there is also -- today in
13 a casino environment, there is still some level of
14 fraud with players club cards that are probably
15 even less secure than mobile devices so I think we
16 have to take that into account. Just by moving to
17 a mobile device is not going to increase the level
18 of fraud. Based on technology between a players
19 card and iPhone is significant. And I just think
20 that there are multi -- there are certain
21 standards from a registration aspect when the
22 wallet is registered to patron Adam Heriton that
23 are relevant, i.e., being a phone number.

24 So you can easily incorporate the
25 requirements for multi-factor authentication to

1 the registration profile that may be mandated or
2 may be set in stone by the operator. So Paul does
3 raise a very valid point because in every instance
4 that I've seen and a lot of the people that have
5 implemented this stuff, one of the primary factors
6 of registration are a person's phone number
7 because everybody has a mobile phone or a way to
8 get access these days. Thank you.

9 MR. DILLMORE: Can I ask a question? Most of
10 the players do insertion of a card. If you go to
11 a mobile device, does that totally negate the need
12 for a card at all or is that another potentially
13 secure mechanism is you have to have the phone and
14 the card working together?

15 MR. HERITON: Adam with Everi. I think it's
16 just an additional form. In the implementations
17 that I've done, there's two available today, and
18 then there's additional ones available at a later
19 time.

20 One is a phone lookup and one is a card
21 entry. That other implementation that Mr.
22 Martinez was talking about, the Bluetooth
23 connection, I don't believe that has been
24 implemented to date, but that is a funding source.

25 Then there is another funding source with

1 Acres' technology. And then I know there is
2 another funding source -- there are additional
3 funding sources with other providers out there,
4 other providers of this technology throughout.

5 MR. BLAND: Patrick Bland, Acres. So the way
6 that we've done deployments with other customers
7 is the mobile app facilitates a virtual card in,
8 right, so it establishes a player session and the
9 Legacy CMS system for tracking purposes, but it
10 negates the need to have a physical card. They
11 could still use a physical card if they wanted to,
12 but they don't have to.

13 MR. TROMBETTA: Thank you. I think we're on
14 F. If geolocation would be necessary which we
15 kind of covered already. I'll be happy to open up
16 so we go through. G, what are the appropriate
17 Know Your Customer standards. Again, I think
18 we've talked a lot about this.

19 Yes.

20 MR. BENEDIK: Gabe Benedik, GLI. For the KYC
21 component, obviously, GLI works with every
22 jurisdiction globally, so just to bring this to
23 the table for visibility for you all and for the
24 record: Some jurisdictions allow for anonymous
25 player accounts, so just take that into

1 consideration.

2 While others may require verified player
3 accounts which go through the KYC process, but
4 when jurisdictions allow for anonymous player
5 accounts, they enforce limits on the account
6 balance. So just something to keep in mind that
7 it's -- there isn't a standard per se, there's
8 options.

9 MR. TROMBETTA: How does an anonymous player
10 account work?

11 MR. BENEDIK: Just like in the sports betting
12 world, somebody can walk up to a kiosk, place a
13 wager, and there's no record of who plays that
14 wager. And that's in a physical environment.
15 That happens at Seminole right now.

16 MR. TROMBETTA: I guess my question is: How
17 did that work in a cashless environment where
18 there's something to track -- how would an
19 anonymous player essentially put money on a slot
20 machine that isn't cash?

21 MR. BENEDIK: I see others that want to chime
22 in.

23 MR. HIRSCH: Mike Hirsch, IGT. You'll have
24 to have some kind of a QR code on the game. You
25 take a camera of that QR code, it opens up a

1 portal on your phone where you can then fund from
2 your bank directly to the machine. So you're
3 anonymous to the casino, but you're not anonymous
4 to the source of the money. The bank knows who
5 you are.

6 MR. SMITH: Derek Smith, DMM. Just one other
7 comment on that. Nothing anonymous is purely
8 anonymous when you're talking about the
9 transaction of funds, right, so anything that's
10 happening with a record in the system.

11 So whether they're doing a QR scan or whether
12 they're doing a code entry at a kiosk, it doesn't
13 really matter. A method of establishing that
14 transaction generates a record. That record can
15 be associated with that anonymous player. They
16 just need to have their number or their code in
17 order to access what they've now transacted.

18 MR. TROMBETTA: Understood.

19 MR. HERITON: Also, one step further, my
20 experience with credit cards or credit card
21 accounts or credit card credentials, sources, if
22 there is potential configurability depending on
23 the provider of the service that, if that card is
24 not recognized in that financial services
25 institution, i.e., something like Everi, i.e.,

1 something like Coin, something of that nature, if
2 that card is not associated with that known
3 player, that transaction could be halted or paused
4 until that player is able to KYC in person with
5 that credential thus allowing that transaction to
6 then proceed forward.

7 So there are a lot of configurabilities and
8 functionalities that can be implemented depending
9 on who the financial or the transactor of the
10 wallet transaction is for that to occur.

11 MR. TROMBETTA: Thank you. So next question,
12 it has to do with data security.

13 So this question, it comes from us in
14 specifically sort of how player data and
15 specifically accounts how that will be protected.
16 I can tell you, too, there's an interest from the
17 commission in general, just about what happened
18 recently with some of the companies. Just
19 security as obviously there's going to be more
20 data collected with this type of system. How is
21 it protected generally and what can -- what, I
22 guess, do the casinos do to ensure player data
23 would be protected in this new system is sort of
24 where the interest here is coming from.

25 Anything you have now or in followup would be

1 helpful.

2 MR. HERITON: I don't know. I can't speak to
3 exactly this, but I don't know the answer or I
4 want to clarify if there -- I don't really believe
5 there's necessarily more transactional data
6 collected in a wallet transaction. I believe that
7 the property has their patron-related information
8 that resides in their CMS. I believe the
9 transacting company who is issuing a transaction
10 in that nature has their database profile
11 associated with the credentials of that patron and
12 their cards.

13 When you register those patrons, you marry
14 those up on whatever those key factors, however
15 many of them there may be. Aside from that, Everi
16 is responsible or some other provider is
17 responsible for the financial transacting
18 information, the casino property is responsible
19 for the patron profile information, the PPI on
20 their end, but that's commonplace today. So I
21 don't really see that -- there is just a greater
22 transfer of information, especially during the
23 registration process, but I don't foresee and I
24 don't see a situation where there is actually more
25 data being collected or different data collected

1 today in a future state with wallet than there is
2 today.

3 MR. BLAND: Patrick Bland, Acres. So Adam's
4 totally correct, that's kind of the paradigm that
5 we live in right now, but just from a cashless
6 wagering or cashless system, kind of like our
7 technology works because we're a bolt-on to the
8 CMS. We don't know anything about the patron. We
9 might get a transaction ID and a wallet ID or
10 something to identify that person, but that's
11 pretty much it.

12 So your typical data buckets or PII are going
13 to be with the wallet provider, your CMS provider.

14 MR. TROMBETTA: Are there other hands up?

15 MR. SCHLAFFER: Paul Schlaffer with Hialeah
16 Park. Regarding the data, I think from a
17 regulatory standpoint, we can just state that
18 regardless of where the data is stored, that it's
19 stored within PCI and DSS standards because those
20 are government standards and they're always
21 changing. And therefore, the data has to be
22 encrypted, the transmission has to be encrypted,
23 you know, based on those standards.

24 In the terms if data is stored in a cloud
25 environment, I'm a big proponent of zero-knowledge

1 encryption which means that the cloud provider
2 does not actually have that encryption code, so
3 even if that cloud provider gets hacked, that data
4 will still be inaccessible to the hacker.

5 MR. MARSHMAN: Following up on the presence
6 of the other standards that you mentioned on, as a
7 state, we do not have to reinvent the wheel if
8 it's not necessary, but we still have to know what
9 the standards are and formally adopt them by rule.

10 So that's going to take some time on our end
11 just to say, "Okay. If we believe that these
12 standards are sufficient," and based on what I'm
13 hearing so far, I don't know if we have a reason
14 to say they're not, but we would have to then
15 capture those and then incorporate them into our
16 rule so that they would be part of it.

17 We don't have to come up with our own
18 standards so much as just figure out what's out
19 there. And if it's coming from another government
20 entity, all the better. There's already inroads
21 in Chapter 120 for us to adopt specific federal
22 standards. There's a shortcut basically to adopt
23 specific federal standards in a certain way, so
24 that's -- please identify anything and everything
25 you think that we should look at and incorporate

1 all of that.

2 MR. SMITH: Derek Smith, BMM. If you haven't
3 already looked at the national standards of
4 technology, there are a number of good resources
5 there in terms of standards for encryption or data
6 protection. Most of them are already established
7 in line with federal standards as well for PCI.

8 MR. MARSHMAN: And just to put a finer point
9 on that. We're not prohibited from adopting,
10 like, a nongovernmental entity standard either,
11 but I think that just, as regulators, we're going
12 to be perhaps more comfortable with, like, the
13 federal government standards. Just because we
14 think that the federal government's going to have
15 that vetting, that knowledge base that we can
16 coop.

17 So your point is well met. We will
18 definitely look at that resource, but that was my
19 only reason for bringing up the, like, the federal
20 government standard.

21 UNIDENTIFIED SPEAKER: Nest 800 is a good
22 resource. There are many subjects within that,
23 but that's generally speaking to the area that
24 you're looking at here. And to your point, they
25 also have standards or have provided guidance

1 regarding the management of Bluetooth controls and
2 NFC, all of these other things that you're
3 concerned about. Risk points for patrons.
4 There's a good library of standards and guidance
5 in that.

6 MR. MARSHMAN: Thank you.

7 MR. TROMBETTA: If there were other
8 questions -- our last question is essentially give
9 us other information. Are there other states --
10 some other states have already come out with other
11 standards.

12 If you think there's someplace that has good
13 standards that you'd like us to look at and be
14 aware of, please give us that information.

15 Yes.

16 MR. BENEDIK: Gabe Benedik, GLI. Per white
17 papers, and I'm going to submit these to you all,
18 the AGA has a really good white paper on this.
19 The National Council on Problem Gambling also has
20 a white paper that I'm going to submit to you all
21 electronically in regards to this, but there's
22 many resources that you can go out into the
23 industry and find information on, you know, player
24 account requirements, cashless wagering system
25 requirements, you can look no further than us at

1 GLI for cashless technology requirements.

2 We have GLI 11 that you can reference. GLI
3 16, they both deal with industry standards in
4 regards to cashless wagering. It can be an easy
5 lift for you all as you incorporate cashless
6 wagering. But I'll submit the other player
7 account requirements because we have references to
8 Nevada and Nebraska and South Dakota for you all
9 to reference and research.

10 MR. TROMBETTA: Thank you. Anything else on
11 J? I realize I skipped that one. So far I, which
12 is now our last one here.

13 This just kind of goes to some of our
14 questions. If there's anything else you'd like
15 for us to consider in terms of protection or
16 security or just anything else to be aware of, any
17 of that will be helpful.

18 As you can tell we're trying to wrap our
19 heads around this in a way to best go forward.
20 Anything else on this one, on I? Okay. All
21 right. We're going to close that portion. Any
22 other kind of general comments? One more
23 opportunity for anything else.

24 As I mentioned at the start, we're going to
25 keep the record open until February 12. Please

1 give us anything else you want us to consider.

2 Big picture, depending on what we get back,
3 my goal is to move into the next phase of
4 rule-making which we would have to have the
5 language and have a hearing on the language. That
6 might take a little bit of time.

7 If we get the feedback, I think we're close
8 to that. If we have other questions, I just want
9 to make sure to leave the door or the window open.
10 We may have to have another workshop. I'm trying
11 to avoid that for time's sake. Once we have that
12 hearing, get the feedback on the rules, again
13 going back big picture, depending on feedback,
14 "Hey, you guys are awesome, this is great," we can
15 kind of just move. If we need to revisit stuff,
16 we make amendments and kind of go from there.
17 That's the big picture on this.

18 Anything from my staff here before we --

19 MR. DILLMORE: I do have one question. So,
20 like, you know, the possibility of these wallets
21 and things could open up a whole avenue of player
22 compliance. So right now, the essential
23 monitoring system, we can -- everything, all
24 transactions at the slot machine go into the
25 mining system. We can go back and investigate

1 compliance of the players, if they win or
2 whatever.

3 So this would be something new. People
4 potentially may be loading stuff into an account
5 or something didn't hit their account and open up
6 a new area of complaints for the commission.

7 So who would be responsible for housing all
8 those account transactions and then ultimately
9 held responsible for, like, reporting on them.

10 So we have a complaint from a patron that
11 said, "I loaded all this money on my account, it
12 didn't show up, and it's just gone." Can anybody
13 enlighten us how that might happen, how we might
14 investigate it, and who would be responsible for
15 reporting it?

16 MR. HERITON: Adam with Everi. So the way I
17 understand it to be done today is, if there is an
18 issue with a financial transaction, Joe says that
19 he put a thousand dollars in and it hit your
20 account and you don't see the thousand dollars in
21 your wallet for whatever property it's associated
22 with.

23 At that point in time, probably the first
24 step would be to contact the property. They would
25 determine whether that money made it into their

1 ecosystem which is easily viewable generally via
2 their CMS or whatever technology they're using.
3 These transactions can be pulled up via their CMS
4 whether the money made it into their wallet, into
5 their account. If the money has made it into
6 their account -- so any transaction of that
7 explanation would fall on the person or the
8 company that is providing those funds. If it
9 never made it into the account, the property
10 vetted it and never went into the account, then
11 it's on us to investigate that and report back.

12 When the money is verified that it came out
13 of your account and it made it into the ecosystem
14 or the property or the enterprise, and then that
15 money is unable to be located, can't be found at
16 that point, gets lost in the CMS somehow, things
17 happen -- there are unique -- it can be easily
18 identified and tracked. And generally what the
19 determinative has been, generally there is
20 somewhat a configuration on that slot machine that
21 cannot accept a wallet, cannot accept a transfer
22 in, cannot accept a transfer out. And generally
23 that is on the property onus to disclose that to
24 the patron.

25 So if the money comes out of the account and

1 is never located in the enterprise wallet for that
2 entity, then it's generally on Everi or one of the
3 financial provider institutions to disclose that
4 or the service providers, but if it makes it into
5 the ecosystem, then it's generally on the
6 property, the enterprise to disclose that.

7 It does take a little bit of time, like any
8 research or financial transactions do. They
9 aren't that often. They don't occur that often,
10 and I generally believe the reason those don't
11 occur that often, especially the transactions that
12 make it into the ecosystem and then just get lost
13 is because I believe rated players who know their
14 account and who know their financial history, are
15 more in tune than players who are not, who are
16 just flying through their money.

17 So I do believe that there is a little bit of
18 still determinant on who is going to be
19 responsible for those things, but then it's
20 generally ironed out very closely. One last piece
21 of it.

22 When we provide a service, we generally issue
23 an error code on your wallet. What that error
24 code is, we have an index of error codes that
25 says, "Hey, this was an institutional decline.

1 This was this decline. This got stuck in your CMS
2 system." So we generally have an error code that
3 is produced with whoever we work with, where you
4 can determine what specifically causes that error.
5 Thank you.

6 MR. BLAND: Patrick Bland from Acres. Right,
7 so, you know, the cashless transaction, it's two
8 sides of one coin. You've got the wallet, if
9 we're talking about a wallet that we've been
10 talking about today, you've got the funding side
11 of that wallet, so I'm Bob and I'm linking my Bank
12 of America checking account and transferring that
13 to my, you know, Bazooka Joe Casino wallet, right,
14 there's that side of the coin, and then it's the
15 value delivery to the slot machine, right.

16 So there's a lot of logging and auditing and
17 reporting that the financial services providers,
18 you know, provide as part of that wallet service.
19 But when the request is made to put funds on the
20 slot machine, CMS has tools to do that. Us as a
21 cashless wagering system, right. There's a lot of
22 auditing and detailed information we get about
23 every single request, right. So the nice thing
24 about all of this is, there's so much digital
25 exhaust keeping track of the entirety of the

1 transaction, right.

2 A lot of that is there that's easily
3 accessible that can be used for a patron dispute.
4 Another thing, like, within some of the financial
5 service provider and casino mobile apps is that
6 the players have access to how much they
7 transferred to a slot machine, how much they
8 transferred off of the slot machine. It's all
9 there available in the mobile app.

10 MR. DILLMORE: Once it's in the environment,
11 once the gets in, then everything is trackable
12 through the CMS, as far as, like, if I won a
13 jackpot that supposedly didn't get loaded in my
14 app, I mean, that's going to all be visible in the
15 reporting of the CMS?

16 MR. BLAND: Yeah. Like, just imagine a
17 cashless wagering system could be like a virtual
18 bill acceptor. Once it's on that slot machine,
19 all the meters, all the reporting, everything on
20 that slot machine still happens the way that it's
21 been happening for a long time.

22 MS. KAUFFMAN: I just wanted to ask. So when
23 it comes to funds that are transferred over, does
24 that fall into Reg E? Is there, like,
25 requirements for resolution for the customer?

1 Because I'm sure the Florida Gaming Commissions, a
2 lot of the focus is on the stakeholders, right?
3 Like, the people that are coming in and playing.

4 So is there timelines that are out there for
5 when somebody does make an allegation of when the
6 funds never made it?

7 MR. BLAND: Generally, it's based on when the
8 call is placed. So if a customer doesn't
9 realize -- it's generally -- we generally have a
10 requested window to do that investigation. There
11 is generally a time period. I don't know that
12 time period off the top of my head, but generally
13 it's from initial contact. Sometimes if we
14 don't -- if there's an institutional decline and
15 the customer gets denied a transaction, we won't
16 even see the reason for that transaction decline.

17 If that transaction is approved, we approve
18 it and then that money goes into a staging, an
19 FDIC trust account and then that money via the
20 Acres or other solution models, that's where that
21 money is withdrawn from into that wallet
22 ecosystem. So there is -- I don't know of a
23 definitive time frame that is set at this point,
24 but I know that it's very easily, after a gaming
25 day, you can reconcile your wallet transactions

1 based on what came into your ecosystem and what
2 was approved through your user.

3 It's a pretty simple reconciliation at this
4 point just based on most of the transactions,
5 there's still not a great quantity.

6 MS. KAUFFMAN: I just thought maybe with Reg
7 E applying to financial institutions, that it may
8 in fact apply to that, that things have to be
9 resolved within a set period of time?

10 MR. BLAND: I want to say 72 hours, but I
11 can't speak to that.

12 MR. MARSHMAN: Just before we move on, Ma'am,
13 identify yourself do you mind please identifying
14 yourself for the court reporter.

15 MR. KAUFFMAN: Audrey Kauffman again.

16 MR. MARSHMAN: Thank you.

17 I have a followup question since we've been
18 sitting here too long, you said the term digital
19 exhaust. As regulators in the state of Florida,
20 are there already sufficient guidelines,
21 regulations, whatever that capture a sufficient
22 amount of that digital exhaust so that Florida
23 doesn't have to add anything on? In other words,
24 from just -- if you were us and you were tasked
25 like Mr. Dillmore was saying with tracking down a

1 customer complaint and you may not know this off
2 the top of your head and that's fine, but please
3 consider it: Is everything that's already out
4 there, is everything that's preexisting, is there
5 enough regulation or requirement for lack of a
6 better term, that captures a sufficient level of
7 that digital exhaust, so that if we're asked upon
8 to sort something out, we can do it in the state
9 and not have to create something new so we can
10 solve that customer's problem as much as we can?

11 MR. BLAND: Patrick Bland, Acres. So within
12 the -- to my knowledge about the Florida Regs and
13 I was doing my homework last night, so I'm not an
14 expert in it, but, you know, a lot of the
15 reporting that's already listed provides a lot of
16 the kind of customer dispute-type things that you
17 would need, right.

18 In the rare situation, because slot machines
19 can be weird things and funny things, right,
20 errors can happen, right. It's just up to the CMS
21 or the cashless wagering system to have that
22 reporting available to show we, you know, we tried
23 to make a transfer to this machine and it failed
24 out for this error code, right.

25 And so, you know, a lot of that stuff is

1 already there, but I'll think more if there's any
2 additional kind of frameworks or anything that
3 might be helpful or relevant from a gaming
4 perspective.

5 MR. HERITON: Adam Heriton, Everi. The only
6 thing I will say is, in my experience, I would say
7 conservatively four to five of patron concerns,
8 questions, comments are generally on the
9 property/enterprise side because the financial --
10 think about doing a cash advance, there's really
11 not much back and forth. The transaction is
12 either authorized or it's not.

13 Very similar in this type of scenario with
14 wallet-type transactions or card-not-present
15 transactions. Specifically when you're talking
16 about issues that arise, I would say four to five
17 or 80 percent probably occur within a CMS system
18 that is easily identified by the property and then
19 the patron complaint is then resolved.

20 MR. TROMBETTA: I saw a hand up in the back.

21 MR. MEDLIN: I'm Mike Medlin from FBM gaming,
22 a slot machine manufacturer. And I understand
23 there's two critical components from this and
24 almost all of the conversation has been based upon
25 the security, which is obviously of utmost

1 importance.

2 At the same time, there is the issue of the
3 operational benefits to the casinos in
4 facilitating convenience, and as a way Mike Deluca
5 Junior spoke to me, of facilitating the activity
6 of wagering on the casino floor. Benefit to the
7 player, not bringing physical cash into the
8 casino.

9 For me, this is a very important component in
10 that we need to make sure that the technology is
11 consistent beyond Florida where it's consistent
12 regulations whereby the handshake that must take
13 place from the CMS system to the slot machine is
14 recognized in a very quick time frame so that the
15 player experience maintains positivity.

16 And obviously the casinos can recognize that
17 benefit of adding more convenience to their
18 players, making a more enjoyable gaming
19 experience, yet not being so burdened by all of
20 these additional impacts on the system which can
21 impede that handshake taking place with the slot
22 machine or needing this on the floor that some
23 manufacturers can recognize the handshake faster,
24 some don't follow a certain protocol and thereby
25 they might have a kickback where the customer is

1 trying to play their favorite machine but that
2 machine doesn't recognize the handshake. So I
3 think that's something you guys also have to
4 consider when establishing these regulations.

5 MR. TROMBETTA: Thank you for the comment. I
6 think that's a great point, in that, right, this
7 is all for nothing if the players don't want to
8 use it. I hear you is what I'm saying. It's
9 something for us to consider. I appreciate the
10 comment. Anything else in general?

11 MR. HERITON: I'll add in closing, I think as
12 the State looks at this and as the operators in
13 this state look at this that are under these
14 statutes, I think the three main components of
15 this, in my opinion, are, patron guest experience
16 as Mike just mentioned. I think opportunity for
17 increased enhanced revenues and opportunity for a
18 more efficient gaming experience and cost savings.
19 And I genuinely, truly believe that and I
20 believe -- I think that can become a reality in
21 the short-term even if we go to the crawl, walk,
22 run or whatever approach is present.

23 MR. BLAND: Just in closing -- Patrick Bland,
24 Acres. Thank you, guys, for putting us on and
25 just to Adam's point about capturing a younger

1 market in gaming, right, so we can grow gaming
2 revenues. If you look at brick-and-mortar
3 casinos, gaming revenue has pretty much been
4 stagnant over the last 10 years adjusted for
5 inflation.

6 So some interesting things as we've seen as
7 we've brought cashless into the marketplace is
8 that, like, quantifiable metrics where our
9 customers that have deployed this technology,
10 18 percent increase in time on device, 22 percent
11 increase in return trips, right. So there is a
12 quantifiable kind of benefit, right, with all the
13 protections and all the security and everything
14 that we can wrap around it. But most importantly
15 providing a good customer experience so that they
16 can get their wallet, they can get signed up. In
17 less than 10 minutes they tap a slot machine and
18 they can do that, so thank you.

19 MR. TROMBETTA: So, again, we will take all
20 this records to February 12th. What's the contact
21 one more time?

22 MS. STINSON: It is clerk@flgaming.gov.

23 MR. TROMBETTA: Please submit, and really
24 thank you all for coming. And we are done. We
25 are closed. Thank you.

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CERTIFICATE

THE STATE OF FLORIDA,)
)
COUNTY OF PALM BEACH.)

I, Lee M. Walker, Registered Professional Reporter,
do hereby certify that the foregoing proceedings were
held as hereinabove set out; that I was authorized to
and did report in machine shorthand the proceedings in
said workshop; and that the foregoing pages comprise a
true and correct transcription of my stenotype notes of
the proceedings.

Dated this 5th day of March, 2024.



Lee M. Walker, RPR
Stenographic Shorthand Reporter
My Commission Expires: 11/30/2027
Commission No.: HH 427900

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