

Building Public-Private Partnerships in Washington

by Geoff Freeman, President and CEO, American Gaming Association

While many industries decry the increasing regulatory burdens emanating out of Washington D.C., it is important to understand that targeted gaming regulations are fundamental elements of the gaming industry's continued success. At the American Gaming Association, we believe that finding the regulatory "sweet spot" is best accomplished through engagement, collaboration and education. That is exactly the approach we have embraced with the U.S. Treasury Department's Financial Crime Enforcement Network (FinCEN), and believe that our partnership can strengthen the nation's security.

At G2E 2013, FinCEN Director Jennifer Shasky Calvery underlined the important role public-private partnerships play in protecting the U.S. financial system, safeguarding our national security and supporting millions of Americans who fall victim to financial crimes.

Eight months later, I'm pleased with the progress that our industry has made with FinCEN. With the support of AGA's Bank Secrecy Act Working Group, our industry can report a number of achievements:

- Establishment of a day-to-day point of contact within FinCEN and the gaming industry;
- Frequent detailed meetings in Washington, D.C. on emerging anti-money laundering (AML) issues;
- Insightful feedback on drafting best practices for the gaming industry; and
- Ongoing dialogue to align our industry with FinCEN's expectations and more clearly affirm our commitment to AML compliance.

FinCEN and Casinos Invested in Protecting Gaming Customers

The casino industry is committed to working with FinCEN to thwart criminals. Our security and surveillance systems are extensive and we pride ourselves on leveraging them to protect our communities and customers, and to assist law enforcement when and where possible.

Likewise, FinCEN has robust data collection capabilities and has invested American tax dollars to develop sophisticated technology for better analysis of financial intelligence.



Through coordinated information sharing, casinos and FinCEN can optimize their separate systems and capabilities. For example, by allowing the casino industry to share suspicious activity reports (SARs) across gaming properties owned by the same parent company, casinos would be better equipped to protect their customers from criminals and assist FinCEN and other enforcement agencies.



A Lesson from the Travel Industry

This type of reform reminds me of the progress that we achieved during my tenure at the U.S. Travel Association to improve the domestic air travel security process through a public-private partnership with the Transportation Security Administration (TSA).

Post 9/11, the United States' aviation system experienced major changes to ensure that our nation's skies remained secure – a shared goal of the travel industry and the government. Unfortunately, this new system caused major inefficiencies and was unable to differentiate between the everyday traveler and those intending to do harm. Consequently air travelers became extremely frustrated and opted out of millions of air travel trips annually.

Recognizing the need for a collaborative public-private partnership, Congress passed the "Aviation Security Stakeholder Participation Act of 2012," (H.R. 1447), which reconstituted and codified the Aviation Security Advisory Committee (ASAC). ASAC served as the private-sector group for TSA and the Department of Homeland Security to hear the perspectives of experts in aviation and security. It also facilitated communication between air travel passengers and these agencies, which led to innovations that enhanced the overall traveler experience without jeopardizing aviation security.

It was through the recreation of the ASAC that TSA PreCheck and other important reforms emerged to manage risk, improve the traveling customers' experience and strengthen our nation's security.

Do No Harm: Keeping Casinos Safe, Efficient and Fun

The gaming industry is committed to a similar public-private partnership. Under Director Shasky Calvery's leadership, FinCEN has established public-private partnerships ahead of a Congressional mandate, recognizing that some of America's best ideas come from collaboration with those industries who share the agency's national security goals.

Our industry is eager to work with FinCEN to create policies that achieve our shared interests, while adopting efficient and effective security requirements that protect our country's financial institutions, our businesses and our customers.

At G2E, Director Shasky Calvery spoke to how well casinos know our customers. We agree. We know that nearly all of our customers are everyday Americans, visiting our facilities to enjoy a mainstream form of entertainment without hassle or risk.

Just as private-public partnerships helped the TSA streamline its security process and get law-abiding Americans to their destinations safely and efficiently, the AGA is optimistic that increased information sharing between FinCEN and the gaming industry

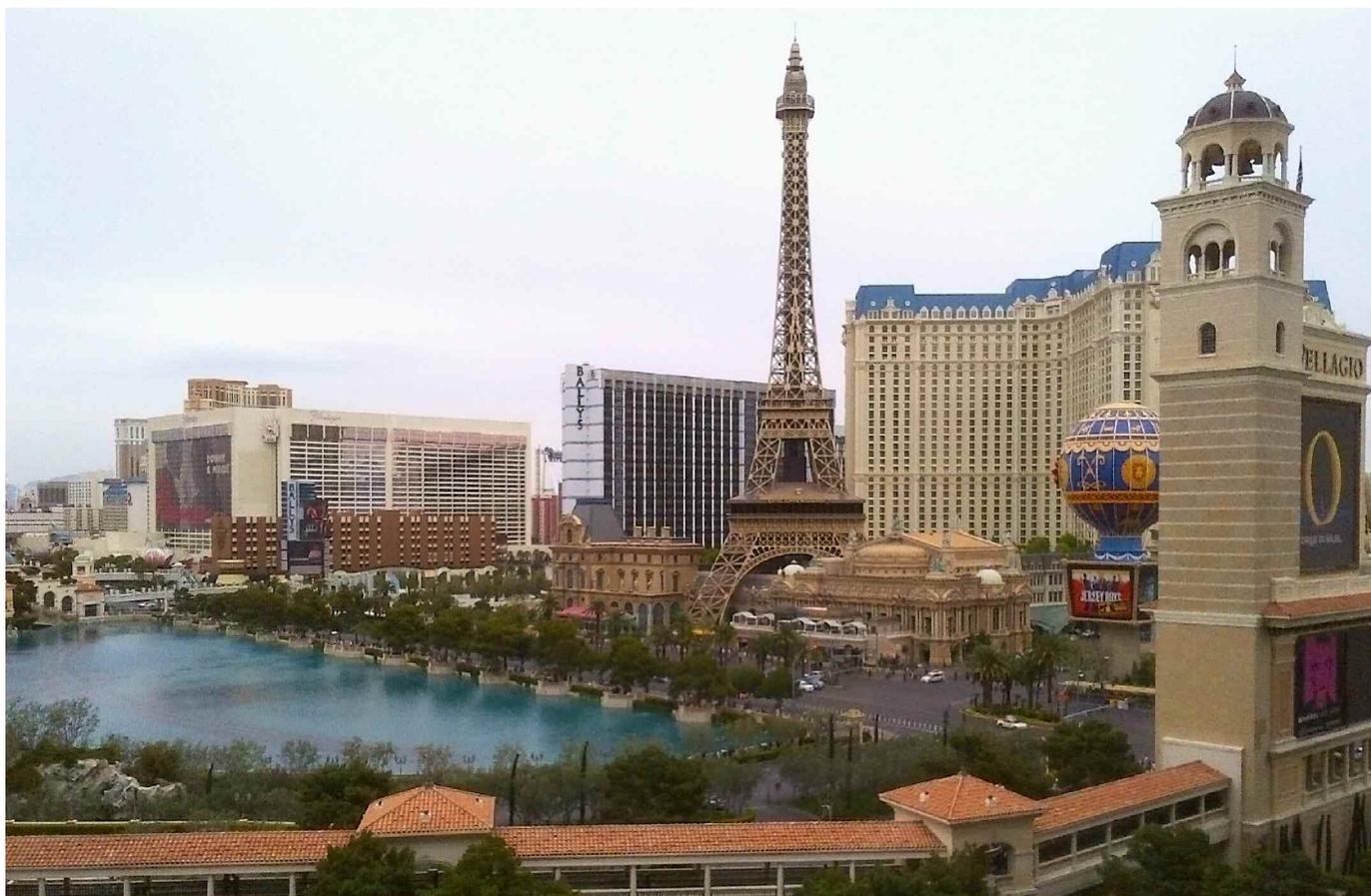
will lead to equally good outcomes. This collaboration should help casinos identify and isolate nefarious actors without harming the gaming experience for the millions of loyal and honest Americans that visit a casino each year.

Geoff Freeman is President and CEO of the American Gaming Association (AGA). In his role as chief executive of the AGA, Mr. Freeman is the leading advocate for the commercial gaming industry and is responsible for positioning the association to address regulatory, political and educational challenges and opportunities.

Prior to joining the AGA, Mr. Freeman was chief operating officer and executive vice president for the U.S. Travel Association, the nation's leading voice for increasing travel to and within the United States. Under his strategic leadership, the travel industry enacted the Travel Promotion Act, derailed an assault on corporate meetings and events, and began the march to building an army of one million employee activists. During his tenure, U.S. Travel doubled its resources.

Mr. Freeman has led a variety of complex and successful issue campaigns during his more than fifteen years in Washington. Previously, Mr. Freeman was a vice president with APCO Worldwide, a global public affairs firm, where he led the highly visible Partnership for Prescription Assistance (PPA). The PPA, supported by America's pharmaceutical companies, was the largest effort ever created to connect uninsured Americans with free prescription medicines.

Previously, Mr. Freeman was the Director of Government Relations and Strategic Outreach for Freddie Mac and Director of Strategic Initiatives for the American Association of Health Plans, the leading representative of the managed care industry.



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