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The _____ MICHIGAN GAMING _____ Newsletter



CYBER SECURITY WEBINAR FOCUSES ON CASINO GAMING INDUSTRY

Yesterday, December 13, 2018, RMC Legal hosted a webinar that focused on Cyber Security issues impacting casinos. Casino operators are the frontline defense in securing customer data. Given the dependence on slot accounting systems and technology from third party vendors, however, these vendors are also important partners to ensure that a casino organization has developed a sound system to protect customer data. The webinar examined best practices that casinos can take in developing their cyber resilience strategy based upon the inclusions of various new forms of connectivity and the amount of data that is collected on casino customers.

The webinar was moderated by Robert Russell of RMC Legal and featured Tracy Lechner, owner of Law Offices of Tracy L. Lechner LLC, Maureen Kaplan, Global Head of Sales, Cloud & Security, of Vodafone Business, and Ryan Guzal, InterLAN Security, of RMC Cyber.

Ms. Lechner began the program by providing a detailed overview on the various federal, state and international laws of which casinos should be aware. Ms. Lechner outlined five practical steps towards developing and maintaining a robust Cyber Security program:

Data Mapping & Security Controls. Determine what data is being collected, how it is being used, how and why it was collected, under what authority, how long it will be retained, how secure it is, and whether it is and/or should be shared with third parties. Identify and redress compliance gaps. Ensure that appropriate security controls are in place.

Review and update privacy notices. Ensure that the company has a legal basis for collecting and processing personal information. Identify and address gaps between the company's data collection and processing practices and what the company has disclosed to data subjects. Don't misrepresent what

the company is doing.

Update contracts, policies and procedures.

Ensure that company policies and procedures are up to date, and that consumer contracts and contracts with service providers and vendors contain appropriate disclosures and requirements.

Employee Training. Train employees at regular intervals on security best practices and on company policies and procedures to ensure that they are properly implemented.

Incident response preparedness. Ensure that the company has adequate procedures in place to detect, report, investigate and mitigate a data breach.

Ms. Kaplan spoke about a recent Barometer Report her company, Vodaphone, recently released. The 2018 CyberReady Barometer Report revealed, among other things, that customers value a business that puts security controls in place and is willing to pay a premium to know their data is being protected. The complete report can be found [here](#).

Mr. Guzal concluded the webinar by providing attendees with detailed information as to how best to build a cyber-resilient environment. He noted that understanding the risks, including where data rich information is stored and the security parameters around the information is the key first step. Crucial to the process of developing the appropriate environment is obtaining buy-in from management and company boards. To do so requires putting cyber information into business terms as opposed to only information that the IT department understands and manages. Mr. Guzal noted that his initial goal when he consults with clients is to identify the scope of the secure information and provide information on system gaps that speak to senior management and their desire to manage risk.

A download of the webinar and set of slides will be available shortly at www.casinowebinar.com.

FRUITPORT CASINO PROPOSAL RECEIVES PUBLIC SUPPORT AT BIA HEARING

In the next step towards opening up a casino in Fruitport operated by the Little River Band of Ottawa Indians (“Little River Band”), the U.S. Department of Interior’s Bureau of Indian Affairs held a meeting on December 12, 2018 to receive public comments on the draft environmental impact statement it published in November. Members of the public as well as representatives from the Little River Band flocked to the Fruitport Middle School auditorium to have their voices heard.

The casino, estimated to cost \$180 million, is proposed to be built at the northeast intersection of South Harvey Street and Ellis Road south of I-96, the former location of the Great Lakes Downs racetrack. The Little River Band purchased the property in 2008. Current plans call for a 149,069 -square-foot casino, a 220 room hotel, 1,700 slot machines, 35 table games, dining facilities, an entertainment center and parking. The BIA’s report evaluated and detailed steps needed to mitigate impact on geology and soils, public services, hazardous wastes, transportation, water resources, noise and other factors. The BIA’s recommendations include limiting construction activity to 7:00 am to 11:00 pm, testing groundwater if utilizing wells, and specifying training for prospective employees to identify and provide resources for gambling addiction.

53 people registered and gave public comments on the project, with 50 of the 53 speakers conveying support for the proposed casino. Several speakers expressed approval of the Little River Band’s estimations of 1,200 new full-time jobs with an average wage of \$45,000. Little River Band Councilman Ron Pete also noted that their employee benefits are generous: “We provide tremendous benefits for our staff.” In speaking of the Little River Casino Resort in Manistee, which is owned and operated by the Little River Band of which Mr. Pete was the former general manager, he stated: “No one ever paid a penny for their insurance. I can proudly

say that my insurance as general manager was the same as the dishwashers.”

Representatives from a wide variety of groups expressed support, including Fruitport Township, Fruitport Community Schools, Muskegon Community College, Muskegon County, the city of Norton Shores, West Michigan trade unions, local businesses and tribal members. Fruitport Superintendent of Schools Bob Szymoniak stated: “The impact of this casino project on the success of business and industry in the Muskegon area and the lives of its citizens cannot be overstated. We need this project to be more competitive with our neighboring counties to the east and south, we need this project to fuel tourism infrastructure, and we need this casino to give citizens and businesses hope for a better economic future.”

The limited opposition voiced at the meeting focused on concerns for the impact of gambling addiction on the community. Casey Arnouts, the pastor at Grace Assembly of God in Fruitport said: “If someone has a problem gambling, you could lose a house; it’s a stress for marriages. Kids are impacted by anything that gets to that level.” In response, Little River Band Ogema Larry Romanelli indicated: “We have studied the effects of problem gambling. I’ve also seen the effects of unemployment and know what that can do to families as well. I’d be happy to meet with the churches. I’m a proud Christian, so I’m open to meet any time.”

The BIA will take the public comments into consideration, as well as written comments that must be submitted before January 8, in compiling its final environmental impact statement.

Comments can be emailed to felix.kitto@bia.gov or mailed to Timothy LaPointe, Regional Director, Bureau of Indian Affairs, Midwest Region, 5600 West American Blvd. Ste. 500, Bloomington, MN 55437. The final statement is expected to be completed in spring 2019. If federal approval is obtained, the Little River Band of Ottawa Indians will seek state approval of the project before construction can begin.

CAESARS WINDSOR RAISES OVER \$20,000 FOR LOCAL CHARITIES

Caesars Windsor recently concluded an extremely successful social media fund-raising effort. Caesars challenged its social media followers to like, share or comment on their posted #ConcertsforaCure “heart-hand” photos. For every social media interaction, Caesars pledged to donate \$1 to local charities. The campaign resulted in 20,326 shares, likes or comments in October and November, resulting in over \$20,000 donated. Caesars announced that the funds will be distributed to five organizations: Windsor-Essex Cancer Centre Foundation, In Honour of the Ones We Love, Transition to Betterness, Canadian Cancer Society (local chapter) and The Hospice of Windsor-Essex County. A video showing how the funds will be used by each organization can be viewed [here](#).

Kevin Laforet, Regional President, Caesars Entertainment, said, “We are overwhelmed with the support we received from our guests and the community who took the time to interact with us on our Facebook, Twitter and Instagram accounts. It was a simple, yet effective way they could show their support for these cancer-related charities.” The campaign is part of the Caesars Windsor Cares program, established in 1994 as a means to support local non-profit organizations. Caesars Windsor Cares has donated over \$8 million towards the fight against and prevention of cancer and over \$13 million in total.

REMINDER: MGCB PUBLIC MEETING SCHEDULED FOR TUESDAY, DECEMBER 18, 2018

The Michigan Gaming Control Board will hold a regular public meeting on Tuesday, December 18, 2018. The meeting will begin at 9:30 a.m. with the staff briefing, followed immediately by the regular agenda items. Please [click here for the meeting agenda](#).

The meeting is open to the public and questions,

comments and suggestions from the public, regarding Board business and the licensing, regulation and conduct of casino gaming in Detroit under the Act, are welcomed and encouraged during the public comment portion of the meeting.

The meeting will be located at the MGCB Detroit office, Cadillac Place, 3062 West Grand Blvd., Suite L-700, Detroit. The Cadillac Place is in Detroit's New Center Area near the John Lodge Freeway (M-10), between Second Avenue and Cass Avenue. The Fisher Building and the Albert Kahn Building are nearby landmarks.