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# The \_\_\_\_\_ MICHIGAN GAMING \_\_\_\_\_ Newsletter



## **MICHIGAN GAMING CONTROL BOARD SETS ADMINISTRATIVE RULES HEARING DATE**

The Michigan Gaming Control Board (“MGCB”) released a notice of hearing with respect to the pending administrative rules governing iSports and iGaming. The hearing will take place remotely utilizing Microsoft Teams on Wednesday, September 23 at 1:00 p.m. The online meeting can be accessed [here](#). The full notice can be found [here](#). The MGCB has released several versions of the administrative rules and has solicited input and comments from the industry and interested parties. The current draft of the iSports rules can be found [here](#) and the current draft of the iGaming rules can be found [here](#).

## **FIREKEEPERS CASINO HOTEL AND PARTNER SCIENTIFIC GAMES LAUNCH RETAIL SPORTS BETTING**

FireKeepers Casino Hotel launched retail sports betting with Scientific Games, with hopes to expand the offerings to include digital sports betting and iGaming when regulations are finalized in the State of Michigan.

“These are exciting times for FireKeepers Casino and launching our retail sportsbook is the realization of a major strategic objective. The team at Scientific Games have been integral to delivering this fantastic new offering for bettors in Michigan. We keenly await the opportunity to take both our sports and our casino online with their player-centric technology and global expertise,” said Kathy George, CEO of FireKeepers.

Dacey’s Sportsbook at FireKeepers Casino Hotel had its grand opening in June, making it the first tribally-owned casino sportsbook to open in Michigan. Scientific Games launched its OpenSports product suite, which offers all United States sports, in addition to international soccer, baseball, and golf.

“FireKeepers guests now have the ability to bet on the biggest sporting events worldwide at Dacey’s Sportsbook, located in a restaurant and bar featuring the great food and craft beers Dacey’s Taphouse is known for,” said Jim Wise, FireKeepers Vice President of Marketing of Sports/Online Gaming.

“FireKeepers are one of the leading casinos in the state of Michigan and the Midwest. It builds on our strategy to partner with forward-thinking tribes as regulations evolve. We were the first to partner with a tribe in New York through our agreement with Oneida and now we’re proud to launch the first tribe in Michigan with FireKeepers,” said Jordan Levin, CEO of Scientific Games Digital.

Scientific Games will also introduce its OpenGaming and OpenSports products to launch FireKeepers’ digital sports betting and casino offerings.

“Retail sports is live via our OpenSports solution and the state of Michigan is preparing for a digital go-live for sports and iGaming – both of which are now key parts of our agreement with FireKeepers – as early as Q4 2020. They have a wonderful team and we’re looking forward to building out their full product suite with the launch of OpenGaming once regulations permit,” continued Mr. Levin.

Dacey’s Sportsbook is open Monday through Friday 11:00 AM to 11:00 PM, Saturday and Sunday 9:00 AM to 12:00 AM, or at a kiosk 7:00 AM to 5:00 AM. The restaurant features bar, restaurant, and mezzanine seating, Detroit-style pizza, and large video screens at FireKeepers’ location in Battle Creek.

## **SCOTT SZYBILSKI NAMED DIRECTOR OF FINANCE GUN LAKE CASINO**

Gun Lake Casino announced its appointment of Scott Szybalski as Director of Finance this week.

Mr. Szybalski has thirteen years of gaming industry

experience, serving previously as corporate controller at Hyatt Gaming Management in Chicago. He then served in upper management roles in finance at three different casinos, most recently at Del Lago Resort and Casino in New York.

As Director of Finance, Mr. Szybalski will contribute to financial strategies, provide leadership to the finance team, and take overall control of accounting functions at Gun Lake Casino.

“After a thorough and in depth application process, we are thrilled that Scott Szybalski has agreed to join us at Gun Lake Casino. Scott’s wealth of knowledge, in both finance and within the gaming industry, will be an incredible asset to our leadership team,” said Sal Semola, President and COO of Gun Lake Casino. “I speak for all of our senior management when I say we are eager to welcome Scott to and look forward to working with him during this exciting time in our company’s growth.”

## **FinCEN ISSUES STATEMENT ON ENFORCEMENT OF BANK SECRECY ACT**

The Financial Crimes Enforcement Network (FinCEN) recently issued a statement addressing its approach to enforcing the Bank Secrecy Act (BSA). The BSA applies broadly to “financial institutions,” which include not only banks, but also casinos and card clubs. FinCEN will take enforcement action resulting from BSA violations based upon applicable statutes and regulations. Regulated parties will have the opportunity to respond to and contest factual findings or legal conclusions made by FinCEN during the course of any enforcement action.

The statement outlines the actions that FinCEN may take to address violations, including:

- No Action: FinCEN may close a matter, or reopen the matter if it becomes aware of new information.

- Warning Letter: FinCEN may issue a supervisory letter or other communication.
- Equitable Remedies: FinCEN may seek an injunction or equitable relief when there has been or will be a violation of the BSA.
- Settlements: FinCEN may require remedial measures and civil money penalties as part of a settlement agreement.
- Civil Money Penalties: FinCEN may assess a civil money penalty.
- Criminal Referral: FinCEN may refer a matter to law enforcement agencies for criminal investigation or prosecution.

“FinCEN is committed to being transparent about its approach to BSA enforcement. It is not a ‘gotcha’ game,” said FinCEN Director Kenneth A. Blanco. “The information required by the BSA saves lives, and protects our communities and people from harm. It is a national security issue.”

FinCEN considers many factors when evaluating potential violations of the BSA. FinCEN will consider compliance with the BSA requirements, in addition to the adequacy of an anti-money laundering program. FinCEN’s main goals in enforcement are proportionality, consistency, and effectiveness.

Some of the factors that FinCEN considers include:

- Nature and seriousness of the violation, including extent of possible harm to the public and amounts involved.
- Impact of the violation on FinCEN’s mission to safeguard the financial system.
- Pervasiveness of wrongdoing within an entity, and the management’s knowledge or complicity of the violations.
- History of similar violations and other regulatory, civil, or criminal actions.
- Financial gain resulting from the violation.
- Response to or remedial measures taken after discovery of the violation.
- Timely and voluntary disclosure of the violations to FinCEN.
- Quality and extent of cooperation with FinCEN and other relevant agencies.
- Systemic nature of violations.

- Whether another agency took enforcement action for related activity.

For more information and to read the full statement, click [here](#).