

# How Casinos Can Help Combat Human Trafficking

*Training, Community Partnerships, and Education*



Casinos and gaming entities have a responsibility to be on the lookout for and report suspicious activity. The focus is frequently on spotting illicit financial activity, but just as important are measures to prevent and combat human trafficking at casinos and gaming establishments.

Despite perceptions that might portray this as a problem uncommon to the United States, human trafficking is an ongoing problem within the U.S. and disproportionately impacts Native American, Indigenous, and other minority populations.

A recent webinar<sup>1</sup> — [“Protecting Indigenous Communities: Understanding and Combating Human Trafficking in Tribal Gaming”](#) — focused on methods to combat human trafficking and other critical issues.

Presented by [SBC Gaming](#) and sponsored by Vector Solutions, the discussion was moderated by Sean Topchi, Director, Business Development at [Kinectify](#). Jeannie Hovland, Vice Chair/Director of the [National Indian Gaming Commission \(NIGC\) Office of Self Regulation](#), Paul Pellizzari, Vice President of Global Social Responsibility at [Hard Rock International](#), and Jim Fair, Vice President of Security & Transportation of Seminole Hard Rock Hotel & Casino, discussed anti-human trafficking strategies and the responsibility casinos and gaming organizations have in relation to this problem.



## The Scale and Impact of Human Trafficking

As shared by Hovland during the presentation, human trafficking is the third largest criminal enterprise globally and there is an estimated 24.9 million people currently trafficked around the world. Human trafficking occurs when an individual is exploited for labor, services, or commercial sex through the use of force, fraud, or coercion.

While there is a significant lack of data regarding the prevalence of human trafficking activity within casinos or gaming establishments, it's clear that this is a common and disturbing issue. "We do know that these crimes are happening at casinos and hotels everywhere. It's something that the industry is aware of and needs to take action on," Pellizzari said.



Human trafficking has recently been a focus of the federal government as well. In June 2021, FinCEN released "[Anti-Money Laundering and Countering the Financing of Terrorism National Priorities](#)," and included human trafficking and human smuggling among the organization's top priorities. Additionally, [The National Action Plan To Combat Human Trafficking](#) was first released in 2020 and then updated in 2021 by the Biden Administration. These documents demonstrate the increased focus and priority being placed on anti-human trafficking efforts nationwide.

While data on the frequency of human trafficking activities is lacking, there are educational resources available for both individuals and organizations on the subject.

According to Hovland, NGIC first began to focus on the issue of human trafficking in 2017. In the time since, they have collected and [published a list](#) of resources available to the public to educate and inform on the subject of human trafficking. Similarly, the [Bureau of Indian Affairs Office of Justice Services](#) and the [Department of Justice](#) also offer online resources related to the prevention of human trafficking and to provide support and resources to victims, survivors, and their families.

## What Can Casinos Do?

During the presentation, Pellizzari shared anti-human trafficking strategies utilized at casinos and hotels owned and operated by the Seminole Tribe of Florida. The Seminole Tribe established the first large stakes bingo hall in the country in 1979, later expanding with gaming machines and poker, paving the way for other tribes to follow suit. In 2007, the tribe purchased Hard Rock International<sup>2</sup>.

The strategies fall into the following categories

- 01 Operations and team member training
- 02 What an organization can offer victims and survivors
- 03 Public education
- 04 Partnerships within the community



## “See Something, Say Something”

All employees at every Seminole-owned casino or hotel receive training to recognize the signs of human trafficking. These signs might include a guest making frequent trips from the casino floor to their hotel room and back, or even certain language used in conversation.

“We train our team that people are not suspicious, behavior is,” Fair added. “Once you start looking for certain behavioral cues, they become obvious.”

Employees receive training during their orientation as well as refreshers throughout the year in advance of special events that can lead to an increase of human trafficking activity, such as the Superbowl or Miami Grand Prix.



**STOP**  
**HUMAN**  
**TRAFFICKING**



**“See something, say something  
is the most powerful tool  
we have to identify human  
trafficking activities”**

**Jim Fair**

*Vice President of Security & Transportation  
of Seminole Hard Rock Hotel & Casino*

In addition to recognizing the signs of human trafficking, employees are trained on what to do and what not to do should they see suspicious behavior, Pellizzari said.

If an employee sees something they suspect could be related to human trafficking activity, they are taught to alert security. From there, security determines whether to alert police. For their safety, employees are trained that only police are to intervene in possible human trafficking activity. The partnership with local law enforcement, Fair emphasized, is incredibly important to the success of any anti-human trafficking efforts.

Pellizzari also acknowledged that human trafficking can be an uncomfortable topic to discuss or think about and that part of their goal is to normalize discussions on the subject.

“It’s about creating a culture where not only is it okay for someone to point out what they might be seeing, it’s an expectation,” Pellizzari said.

## Supporting Victims and Survivors

In addition to human trafficking prevention efforts, casinos and gaming organizations can provide support to current victims and survivors as well.

To exemplify this, Pellizzari shared a newly launched QR code program utilized at Seminole Tribe properties in partnership with an organization called Twentyfour-Seven.

“We’re piloting a QR code program at four properties. We put it up at the front of house, bathrooms, garages...and if you scan it with your phone you see information on trafficking,” Pellizzari said. The information includes a survey to help victims identify if they are being trafficked and immediate ways to contact law enforcement.

“Within six weeks we had almost 1,000 scans of this code...we know there were six reports to law enforcement and one was significant enough Homeland Security opened an investigation,” Pellizzari said.

## Community Partnership and Education

In addition to providing victims with access to immediate assistance, Pellizzari discussed the importance of partnering with local organizations to improve awareness of human trafficking and educate those most at risk for being trafficked.

“If we can make this uncomfortable topic a part of normal conversation, we can hopefully reduce the risk of people being trafficked,” Pellizzari said.

In the case of the Seminole Tribe and Hard Rock, they have partnered with organizations to build programs to provide education on human trafficking to students, as well as provide employment to teenagers and young adults at risk of homelessness and being trafficked.



**“This is an area we can  
all work on together; we all  
have a role to play”**

**Paul Pellizzari**

*Vice President of Global Social  
Responsibility at Hard Rock International*

## Providing Training To Employees

Tackling the problem of human trafficking and getting a prevention program started can feel overwhelming, said Sean. But training can ensure employees are prepared should a situation ever arise.

“At first, it can seem like an impossible task, but once people are cued in to what human trafficking might look like...it becomes much easier to be able to report it,” he added.

To provide training on recognizing and combatting human trafficking at your gaming organization, Vector Solutions offers [online casino training, gaming compliance and safety solutions](#), as well as a gaming-specific course catalog of nearly 150 online training courses, including a [new course on human trafficking](#).



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## References

1. SBC Webinars. (2023, March 21). Indigenous Communities & Human Trafficking. Protecting Indigenous Communities: Understanding and Combating Human Trafficking in Tribal Gaming. [Webinar] <https://www.bigmarker.com/sbc-webinars/indigenous-communities-human-trafficking>
2. Seminole Gaming. (n.d.). About us. The Seminole Casinos. Retrieved March, 2023, from <https://www.theseminolecasinos.com/about-us>