

KEYNOTE REMARKS FOR VERMONT LAW REVIEW'S TWENTY-FIRST ANNUAL SYMPOSIUM

Thomas R. Parker*

Thanks to Elsa and Madison for the invitation to meet with you today. I'm very pleased to be able to join you today, but little did I know I would be speaking to you from Cairo, Egypt. I've been here for the past six weeks engaging in negotiations with the kidnapers in a major federal international kidnapping case where three young children who are American citizens were kidnapped in the United States and are now being held hostage by their non-U.S. citizen Egyptian father and his Egyptian family. The kidnapping occurred over a year ago, but unfortunately, the international treaties between the United States and the government of Egypt severely restrict the ability of the FBI, or any other U.S. law enforcement agency, to come to Egypt and help investigate this matter. The father and mother of the children are divorced, and all of his parental rights were taken away from him in early 2021 by the Los Angeles County Superior Court due to his physical brutality and severe mental and verbal abuse against the mother of the children. We've had some very recent breakthroughs in the case which have allowed me the time to join you today.

What I'd like to do in my time with you today is to give you a bit of a capstone for this symposium by covering the history of illegal gambling in America over the past 60 years and how the work of the FBI and the Federal government over those years has led the way in essentially neutering organized crime involvement in the corrupt control of both legal and illegal gambling enterprises in the United States, and then give you some additional context to what you have learned from the real experts who have spoken to you today. So, let's journey back to the turn of the last century

The history of gambling in the United States is almost a history of the United States itself. By following the key moments in gaming history in the United States, you can see the major developments that have progressed in the country over the past couple of centuries. "From the first settlers bringing card games and roulette"¹—to the "numbers" games in New York and Chicago in the '40s and '50s—to the "desert mecca of Las Vegas" from the

* Thomas R. Parker was the Assistant Special Agent in Charge of the Los Angeles FBI Field Office. He delivered this keynote address at *Vermont Law Review's* annual symposium titled *Crossing State Lines: Interstate Gambling and the Interplay Between Federal and State Laws*. These remarks reflect his personal experience in the field.

1. *History of Gambling in the US*, ONLINEGAMBLING.US, <https://www.onlinegambling.us/roulette.php/> (last visited Apr. 28, 2023).

'60s and '70s until today's ongoing Internet Revolution, "America has always been at the forefront of gambling."²

Gambling has been a part of U.S. culture since the first pioneers headed west in search of gold and glory.³ Poker and roulette were brought over by settlers, and both games swiftly became mainstays of the American psyche in the 19th century.⁴ There was even betting on gun duels on the dusty streets or in the bars of what we have come to know as the "Wild West." If you've ever visited Taos or Cimarron, New Mexico, or Tombstone, Arizona, you can still see the remnants of some of those shoot-outs resulting from violent disputes over poker games and other forms of gambling. I was in Cimarron a few months ago and visited the historic St. James Hotel, situated on the Santa Fe Trail, which passes through the heart of Cimarron. The ceiling in its bar still bears bullet holes from shoot-outs in the bar, many a result of poor losers of poker games or amidst accusations of cheating. The St. James was the preferred hotel those days for people like Bat Masterson, Wyatt Earp, Jesse James, prolific bank and train robber Black Jack Ketchum, and even Annie Oakley and Buffalo Bill Cody.

In Tombstone, Arizona, not a night passed without numerous poker games getting underway and roulette wheels spinning. Tombstone's infamous "Boot Hill Graveyard" contains the bodies of numerous poker cheats and casino robbers who were caught, instantly tried, and timely executed on the spot in many of Tombstone's gambling halls.⁵ Tombstone is also the sight of the "Gunfight at the OK Corral" involving the Earp Brothers with Doc Holliday against the infamous Clanton Gang.⁶ The 19th century legends surrounding that 30-second gun battle have lived on into today's 21st century.⁷

2. *Id.*; see generally George G. Fenich, *A Chronology of (Legal) Gaming in the U.S.*, 3 GAMING RSCH. & REV. J., no. 2, 1996, at 65 (providing a timeline of gaming in the United States from the end of the 15th century until the 20th century); see also Matthew A. McIntosh, *A History of Gambling in the United States*, BREWMINATE (Sept. 27, 2020), <https://brewminate.com/a-history-of-gambling-in-the-united-states/> (describing the evolution of gaming in the United States from colonial times to the modern day).

3. See *Gaming and Entertainment in Gold Rush Towns*, PBS, <https://www.pbs.org/wgbh/americanexperience/features/goldrush-gaming-and-entertainment/> (last visited Apr. 28, 2023).

4. ONLINEGAMBLING.US, *supra* note 1; see also Matthew A. McIntosh, *Gambling on the Frontier in 19th-Century America*, BREWMINATE (Dec. 17, 2020), <https://brewminate.com/gambling-on-the-frontier-in-19th-century-america/>.

5. Kevin Britz, "Boot Hill Burlesque": *The Frontier Cemetery as Tourist Attraction in Tombstone, Arizona, and Dodge City, Kansas*, 44 J. ARIZ. HIST. 211, 232 (2003).

6. History.com Editors, *Shootout at the O.K. Corral*, HISTORY (Oct. 23, 2020), <https://www.history.com/this-day-in-history/shootout-at-the-ok-coral>.

7. Mary Doria Russell, *Why a 30-Second Gun Fight in 1881 Still Captures Our Imaginations*, WHAT IT MEANS TO BE AMERICAN (Oct. 13, 2015),

A few decades ago, with laws changing around the United States, as well as advances in technology, riverboats began to populate the Mississippi and the Chicago Rivers, along with Gulf Coast sites, even to the point of them ferrying gambling “passengers” to those casinos—and I use that term loosely because the vast majority of the water-borne floating casinos are permanently moored and never move.⁸ There are a few paddle-wheelers on some of our country’s navigable waterways that indeed travel up and down a few of our major rivers offering gaming opportunities to smaller cities and towns along the riverbanks.

Speaking of that “ferrying” of gamblers to floating gaming sites, those became the vanguard of what are known today as “junkets” where gamblers will be picked up by buses or even airplanes in their hometowns and ferried to distant casinos. I’ll talk about that again in a few minutes.

But the real explosion in gaming across the United States came with what is often called “The Las Vegas Boom” in the early 20th century with the establishment of full-blown casinos offering almost every type of gambling people might desire.⁹ As side dishes to attract more gamblers, these casinos began offering entertainment—stage shows with world-renowned singers, dancers, magicians, and the like. This introduced the emergence of major gambling/entertainment destinations across the country.

However, it wasn’t until those early years, and the generation of gambling centers like Las Vegas, Nevada, and Atlantic City, New Jersey, that Americans saw major gambling destinations emerge across the United States, with Atlantic City, New Jersey being the eastern shoreline of that cross-country tsunami.¹⁰

Las Vegas has consistently maintained its place (more or less) as the world’s premier gambling destination, with the city going through a “super casino” boom in the early 1990s, which saw bigger and bigger casinos being built. Having served there in the late 1970s, I hardly recognized the city—especially the Las Vegas Strip—after I had been gone for about ten years.

Despite the mid-2000s recession hitting Vegas profits, and a move to more sophisticated hotel complexes, Vegas shows no sign of losing its iconic status as America’s betting mecca. It “is still the home of the annual World

<https://www.whatitmeanstobeamerican.org/places/why-a-30-second-gun-fight-in-1881-still-captures-our-imaginations/>.

8. Mike Bruner, *Riverboat Casinos Going Nowhere Fast*, NBC NEWS (Aug. 9, 2004), <https://www.nbcnews.com/id/wbna5539243>.

9. See *Timeline*, LAS VEGAS SUN, <https://lasvegassun.com/history/timeline/> (last visited Apr. 28, 2023).

10. *History of Casino Gambling in Atlantic City*, ATLANTIC CITY FREE PUB. LIBR., <http://acfppl.org/ac-history-menu/atlantic-city-heritage-collections/15-heston-archives/68-history-of-casino-gambling-in-atlantic-city.html> (last visited Apr. 28, 2023).

Series of Poker (first held there in 1970) where poker players compete” in dozens of “events for many tens of millions of dollars in prize money.”¹¹

And, as you might imagine, with the mushrooming expansion of casino gambling, along with other forms of “facilitated gaming”—the mob, con artists, and other criminal groups soon joined these expansion movements in their own ways and methods. The New York, Chicago, Detroit, Kansas City, Cleveland, and other lesser-known Mafia families recognized the ready source of money to go after with their mob-tactics—especially using threats, extortion, and deadly force—to gain under-the-table control of these “money-generating machines.”¹² They recognized that if they could infiltrate the “count rooms” of casinos, they would have easy pickins’ by merely skimming cash off the top of the counting table before it was counted and they would have an almost untraceable source of the cash they craved but which was more difficult and risky to obtain from their other illicit enterprises, such as loansharking, extortion, etc.¹³ In the 1970s, there was hardly a major gaming establishment in Vegas that did not have identifiable organized crime figures within their ranks, or as major “hangers around.”¹⁴

They even discovered how they could tap into the junkets and the entertainment shows—both directly and indirectly—by controlling the recordkeeping on the flow of people into the junket buses and into the showrooms, as well as being the suppliers of the food and beverages for the casinos and showrooms.¹⁵

In other words, the mob wanted to control the cash flow into and out of the most profitable sectors of those casinos and showrooms. Skimming was again the name of the game. Skimming became the mob’s crooked scheme of choice in the ’50s and ’60s. But there were no truly effective laws in the FBI’s investigative toolbox to effectively and efficiently go after the mob—especially in Las Vegas. The FBI recognized the influx of mobsters and their

11. ONLINEGAMBLING.US, *supra* note 1.

12. Aaron Gray, *History of the Mafia’s Ties to Gambling and Sports Betting*, SPORTS BETTING DIME (Nov. 24, 2021), <https://www.sportsbettingdime.com/guides/articles/history-of-mafias-ties-gambling/> (New York and Chicago); Michael J. Sniffen, *Leadership of Detroit Mafia Charged in Federal Indictment*, AP NEWS (Mar. 14, 1996), <https://apnews.com/article/21e88165a39af30d15e07b93323eb80a> (Detroit); JAMES NEFF, *MOBBED UP 219* (1989) (Cleveland); Larry Henry, *The Kansas City Connection*, THE MOB MUSEUM (Jan. 4, 2019), <https://themobmuseum.org/blog/kansas-city-connection/> (Kansas City).

13. Gray, *supra* note 14; Henry, *supra* note 14.

14. *The Mafia in Las Vegas*, THE MAFIA, <https://the-mafia.weebly.com/mafia-in-las-vegas.html> (last visited Apr. 29, 2023); Jeff German, *The Mafia’s History in Las Vegas: From Bugsy Siegel to Anthony Spilotro*, LAS VEGAS REV.-J. (Oct. 21, 2019), <https://www.reviewjournal.com/local/local-las-vegas/the-mafias-history-in-las-vegas-from-bugsy-siegel-to-anthony-spilotro-413833/>.

15. See generally *The Mafia in Las Vegas*, *supra* note 16 (providing history of the Mafia’s involvement in the Las Vegas’ gambling industry).

cronies into Las Vegas and its casinos—and into legitimate businesses across the country—especially those with large cash flow. They also recognized that nothing was being done about it by the states—and in Nevada, neither Las Vegas Metropolitan Police Department, Clark County Sheriff’s Department, the Gaming Control Board, and the casinos themselves were doing anything about it nor did they have effective state laws to do something about it.

But, the Nation was concerned with the influence of organized crime, which “involves people coming together in syndicates to conduct business-like illegal gambling, narcotics trafficking, or to infiltrate legal businesses.”¹⁶ Citizens were concerned that such syndicates drained the economy and threatened people’s safety.

Tennessee Senator Estes Kefauver led the Special Senate Committee to Investigate Organized Crime in Interstate Commerce in the early 1950s, which “concluded that organized crime was a threat to America’s economy and security.”¹⁷ At Senator Kefauver’s request, the American Bar Association established its Commission on Organized Crime.¹⁸ Additionally, the President’s Commission on Law Enforcement and the Administration of Justice issued a report in 1967 examining the problem of organized crime.¹⁹ So lawmakers, such as Senator John McClellan of Arkansas, wanted to devise ways to address the problem of organized crime.²⁰ In 1970, Senator McClellan’s efforts led to the passage of the Organized Crime

16. *Organized Crime Control Act Of 1970*, ENCYCLOPEDIA.COM, [https://www.encyclopedia.com/social-sciences-and-law/law/crime-and-law-enforcement/organized-crime-control-act-](https://www.encyclopedia.com/social-sciences-and-law/law/crime-and-law-enforcement/organized-crime-control-act-1970#:~:text=The%20Special%20Senate%20Committee%20to%20Investigate%20Organized%20Crime,Senator%20Kefauver%2C%20created%20its%20Commission%20on%20)

1970#:~:text=The%20Special%20Senate%20Committee%20to%20Investigate%20Organized%20Crime,Senator%20Kefauver%2C%20created%20its%20Commission%20on%20 (last updated May 21, 2018).

17. *Id.*; *Special Committee on Organized Crime in Interstate Commerce*, U.S. SENATE, <https://www.senate.gov/about/powers-procedures/investigations/kefauver.htm> (last visited Apr. 30, 2023).

18. *Organized Crime Control Act Of 1970*, *supra* note 16.

19. *Id.*; COMM’N ON L. ENF’T & ADMIN. OF JUST., THE CHALLENGE OF CRIME IN A FREE SOCIETY 187–200 (1967), <https://www.ojp.gov/sites/g/files/xyckuh241/files/archives/ncjrs/42.pdf>.

20. *Organized Crime Control Act Of 1970*, *supra* note 16; J.Y. Smith, *Sen. McClellan Dies in His Sleep at 81*, WASH. POST (Nov. 29, 1977), <https://www.washingtonpost.com/archive/politics/1977/11/29/sen-mcclellan-dies-in-his-sleep-at-81/e7892597-755b-404b-8e63-80e95f5ab590/>.

Control Act.²¹ Later that year, President Nixon signed the Act into law, allowing law enforcement to “launch a total war against organized crime.”²²

The non-action I described a minute ago even included our own Las Vegas based FBI agents who had been there for years and had been seduced by the glitter of Las Vegas and had become too close to the casino management teams. Major skimming, internal scams, slot machine rigging, crooked dice games, and other schemes were running rampant—and mob informants were telling us that millions of dollars were illicitly flowing to the mob out the back doors of many of the major casinos. The FBI made a dramatic decision that if no one else was doing anything about it, it was time for the Federal government and the FBI to step in and do what the State could not or was not doing for the people of Nevada. Income-tax fraud, mob murders, extortions, etc., were commonplace—but they were happening inside the casino count rooms, the executive offices, the supply warehouses, and in some cases at the gaming tables.

Everywhere there was cash flow, there was criminal activity. Basically, many of those major casinos had become illegal gambling businesses during the “Las Vegas Boom of the ’70s”—they were Racketeering Enterprises as defined in the newly enacted Organized Crime Control Act (OCCA)! So, the FBI cleaned house in 1977—the entire Organized Crime Division of the Las Vegas office was either transferred out of Las Vegas or agents were forced into retirement. Over a period of about three months, a whole platoon of agents from around the country were transferred in with marching orders to go after and decimate the grip of organized crime on Las Vegas and its casinos and gaming related businesses. A group of about 20 special agents were immediately transferred into town from around the country. Every one of those agents had tremendous track records in going after organized crime, corrupt politicians, major financial crimes, and other pertinent experience. They included highly successful former police officers, accountants, lawyers, experienced undercover agents, and successful informant recruiters, who all had extensive experience with labor racketeering and political corruption and similar specialties needed to effectively do the job we were expected to do in Vegas. I was fortunate to be one of those agents.

21. *Organized Crime Control Act Of 1970*, *supra* note 16; *Crime Control Act of 1970*, U.S. H.R. HIST. ART & ARCHIVES, <https://history.house.gov/Historical-Highlights/1951-2000/Crime-Control-Act-of-1970/> (last visited Apr. 25, 2023); see John L. McClellan, *The Organized Crime Act (S. 30) or Its Critics: Which Threatens Civil Liberties*, 46 NOTRE DAME L. 55, 57 (1970) (discussing the passage of the Act resulting from “bipartisan efforts” in which Senator McClellan directly participated).

22. *Organized Crime Control Act Of 1970*, *supra* note 16; *Nixon Signs Bill to Combat Crime*, N.Y. TIMES (Oct. 16, 1970), <https://www.nytimes.com/1970/10/16/archives/nixon-signs-bill-to-combat-crime-gives-tools-for-total-war-to.html>.

We approached the tasks we had been assigned by getting ourselves intimately knowledgeable on the OCCA and its individual federal law components under *Title 18, U.S. Code, Chapter 95 – Racketeering*:

These include the following federal and state crimes. Many of them have state law subsets more specifically delineating the entire range of 35 crimes than can be included in establishing a Pattern of Racketeering:

- Section 1951—Interference with commerce by threats or violence. (Hobbs Act)
- Section 1952—Interstate or foreign travel or transportation in aid of racketeering enterprises. (ITAR)
- Section 1953—Interstate transportation of wagering paraphernalia.
- Section 1954—Offer, acceptance, or solicitation to influence operations of an employee benefit plan.
- Section 1955—Prohibition of illegal gambling businesses.
- Section 1956—Laundering of monetary instruments.
- Section 1957—Engaging in monetary transactions in property derived from specified unlawful activities.
- Section 1958—Use of interstate commerce facilities in the commission of murder-for-hire.
- Section 1959—Violent crimes in aid of racketeering activities.
- Section 1960—Prohibition of unlicensed money transmitting businesses.²³

Another part of the OCCA in 1970, that is perhaps the most widely used today, is Title 18, U.S. Code, Section 1961, otherwise known as the *Racketeer Influenced and Corrupt Organizations Act—or just RICO*—A U.S. federal criminal statute whose original purpose was to prosecute the

23. 18 U.S.C. §§ 1951–1960.

Mafia as well as others who were actively engaged in organized crime, though its later applications have been more widespread.²⁴

1. Requires “at least two acts of racketeering activity” drawn from a list of 35 crimes from a list of both specific federal and specific state crimes within a ten-year period.²⁵

2. Can be charged with racketeering if such acts are related in one of four specified ways to an “enterprise.”²⁶

3. Those found guilty of racketeering can be fined up to \$25,000 and sentenced to 20 years in prison per racketeering count.²⁷ In addition, the racketeer must forfeit all ill-gotten gains and interest in any business gained through a pattern of “racketeering activity.”²⁸

4. A U.S. Attorney who decides to indict someone under RICO has the option of seeking a pre-trial restraining order or injunction to temporarily seize a defendant’s assets and prevent the transfer of potentially forfeitable property and to require the defendant to put up a performance bond.²⁹ That provision was placed in the law because the owners of Mafia-related shell corporations often absconded with the assets.³⁰ An injunction or performance bond ensures that there is something to seize in the event of a guilty verdict.

24. 18 U.S.C. §§ 1961–1968.

25. *Id.*; *Racketeering*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “racketeering” as “[a] system of organized crime traditionally involving the extortion of money from businesses by intimidation, violence, or other illegal methods”).

26. 18 U.S.C. §§ 1961–1968.

27. 18 U.S.C. §§ 924, 1963(a) (2018).

28. *Id.*

29. *See United States Attorney*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “United States Attorney” as “[a] lawyer appointed by the President to represent, under the direction of the Attorney General, the federal government in civil and criminal cases in a federal judicial district”); *Restraining Order*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “restraining order” as “[a] court order prohibiting family violence; esp., an order restricting a person from harassing, threatening, and sometimes merely contacting or approaching another specified person”); *Performance Bond*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “performance bond” as “[a] bond given by a surety to ensure the timely performance of a contract”).

30. *Mafia*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “mafia” as “[a] secret organization of criminals active esp. in Italy and the United States”); *Shell Corporation*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “shell corporation” as “[a] corporation that has no active business and usu. exists only in name as a vehicle for another company’s business operations”).

5. Can also be applied to non-mob businesses that are engaging in the pattern of predicate crimes in furtherance of their business, becoming routinely charged in business civil lawsuits.³¹ Basically, the Act provides significantly increased criminal penalties, seizure of ill-gotten gains or illicit profits, and allows victims of racketeering activities to sue for recovery of losses and damages. The RICO Act also provides that it is unlawful to be employed by or associated with any enterprise directly or indirectly engaged in patterned racketeering activity and/or the collection of unlawful debt.³²

In order for someone to be convicted under the law, the government must prove beyond a reasonable doubt *all* of the following:

- An enterprise existed.* An *enterprise* is “[any] individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact, although not a legal entity.”³³
- The enterprise affected interstate commerce,* which refers to commerce between states, and is regulated by the Federal government.
- The defendant was associated with or employed by the enterprise, and effectively engaged in a pattern of racketeering activity by either conducting or participating in the conduct of racketeering activities via two or more predicate offenses within a ten-year period.³⁴

Predicate Crimes—Form a Pattern of Racketeering Activity

- Bribery, which is the corrupt solicitation, acceptance, or transfer of value in exchange for official action, and usually involves corporate leadership or government officials;

31. 18 U.S.C. §§ 1962, 1964.

32. 18 U.S.C. § 1962.

33. *RICO Enterprise*, BLACK’S LAW DICTIONARY (11th ed. 2019) (defining “RICO enterprise” as “[a] legal entity that conducts its affairs through a pattern of racketeering activity”).

34. *Id.*

- Counterfeiting, or the intentional and calculated reproduction of a genuine article for the purpose of misleading a recipient;³⁵
- Mail, wire, and financial institution fraud;
- Illegal gambling businesses;
- Obstruction of justice;
- Trafficking, whether it's humans, drugs, or illegal or counterfeit goods;
- Tampering with or retaliating against witnesses, victims, informants; and
- RICO also covers a host of other unsavory business practices (extortion, bank fraud, tax evasion, blackmail, forgery, insider trading, investment/Ponzi/pyramid schemes). Even efforts to conceal the criminal nature of any of these activities may constitute criminal offenses under RICO.³⁶

One of the first major federal gambling-related Mafia cases to be charged and tried under RICO was the Las Vegas case against the Mafia families in Chicago, Kansas City, Milwaukee, Cleveland, and Detroit—and their hidden influence and control of several major casinos on the Las Vegas Strip—the Stardust, Fremont, Hacienda, Mariana, and Tropicana—and a handful of lesser-known ones located off the Strip.³⁷ This was then, and still is the largest federal criminal case against Mafia control of Las Vegas casinos and their racketeering enterprises. The front man for the mob in this case was a young entrepreneur and non-practicing lawyer named Allen Glick. Glick came out of nowhere—he had no experience in the gaming business but

35. *Counterfeiting*, BLACK'S LAW DICTIONARY (11th ed. 2019) (defining “counterfeiting” as “[t]he unlawful forgery, copying, or imitation of an item, esp. money or a negotiable instrument (such as a security or promissory note) or other officially issued item of value (such as a postage stamp), or the unauthorized possession of such an item, with the intent to deceive or defraud by claiming or passing the item as genuine”).

36. 18 U.S.C. § 1961.

37. Wallace Turner, *Testimony Details Kansas City Underworld's Control of a Las Vegas Casino*, N.Y. TIMES (June 12, 1983), <https://www.nytimes.com/1983/06/12/us/testimony-details-kansas-city-underworld-s-control-of-a-las-vegas-casino.html>; German, *supra* note 16.

suddenly acquired four casinos with \$67 million from the Teamsters Union pension fund.³⁸

Allen Glick was once considered to be the boy wonder of the Nevada casino industry, but in reality, was a front man for the mob.

Allen R. Glick's initials (A.R.G.) inspired his company's name, Argent Corporation, which owned four Las Vegas casinos, including the Stardust, Hacienda, Fremont, and Mariana.³⁹

Glick, a 32-year-old lawyer and developer with no experience in the casino industry, received a \$67 million "loan from the Teamsters Union pension fund, a loan made possible because Glick knew the son of Milwaukee mob boss Frank Balistreri."⁴⁰

That loan, and the others that followed, came with strings attached. Notably, the number two executive in Glick's empire was a convicted sports fixer with lifelong mob ties, Frank 'Lefty' Rosenthal, at the Stardust Hotel and Casino. It was during this period when Glick was ironically honored as the Las Vegas man of the year.⁴¹

One of the "hangers around" the Glick group was Tony Spilotro, a known hitman and mob enforcer from the Chicago mob, sent to Las Vegas to keep an eye on Rosenthal and Glick.⁴² In reality he was the one they needed to watch. A crazy man! Not very bright, but was very impulsive, and thought he was running the mob's businesses in Las Vegas. In fact, he was the one we got the closest to—we had an undercover FBI agent posing as a jewelry thief wanting to "fence" stolen jewelry to Spilotro's "Gold Rush Jewelry Store"—a front for fencing mob burglary items, especially stolen jewelry. He ended up regularly playing cards with Spilotro and his gang.

Both Rosenthal and Glick were portrayed in the groundbreaking 1995 movie "Casino."⁴³ Rosenthal's character was Sam "Ace" Rothstein played by Robert DeNiro, and Glick's character in the movie, Phillip Green, was

38. George Knapp, *Allen Glick, Mob Front Man and 1970's Casino Boss, Has Died*, MYSTERY WIRE (Aug. 11, 2021), <https://www.mysterywire.com/true-crime/allen-glick-dies/>.

39. *Id.*

40. *Id.*

41. *Id.*

42. *Tony Spilotro*, THE MOB MUSEUM, https://themobmuseum.org/notable_names/tony-spilotro/ (last visited Mar. 23, 2023).

43. CASINO (Universal Pictures 1995).

portrayed by Kevin Pollak.⁴⁴ Spilotro was portrayed by Joe Pesci in the movie.⁴⁵

In reality, however, Rosenthal didn't report to Glick. He reported directly to the head of the Chicago Mafia family, as also detailed in the 1995 movie "Casino" directed by Oscar-winning director Martin Scorsese.⁴⁶ The Argent casinos were skimmed for millions of dollars. That money made its way back to organized crime. After the scheme was eventually exposed, several key players and witnesses were murdered.

Glick became a government witness, helping to convict all of the top leadership of those Mafia families. Former mob lawyer and eventual Las Vegas Mayor Oscar Goodman and several members of his law firm were instrumental in covering up the mob's hidden interests in those Vegas casinos.

We had in excess of 20 wiretaps installed in the case, including on all of the central subjects' homes and offices, the switchboards at the Stardust and Tropicana casinos, several restaurants where the mobsters hung out, in several of their cars, and in a small jewelry business—The Gold Rush—where Tony Spilotro of the Chicago mob hung out and met with his "soldiers" to plan their mob activities.

We convicted the top leadership mobsters of the Chicago, Milwaukee, Kansas City, Cleveland, and Detroit Mafia families on RICO, ITAR, IGB, and conspiracy charges.

Though not a traditional illegal gambling case, it was a major case involving the takeover and operation of a legitimate gambling business and turning it into a criminal enterprise which sent a strong message to the mob that they cannot expect to freely operate in Las Vegas or any other legal gaming venue without being under the constant scrutiny of the FBI. This case has been described as striking a major blow against racketeer enterprises getting involved in the gaming industry.⁴⁷

I think the future of legal gaming in this country is assured and strong—a multitude of safeguards and legal barriers are in place to prevent the mob

44. *Id.*

45. *Joe Pesci Biography*, IMDB, <https://www.imdb.com/name/nm0000582/bio> (last visited Apr. 30, 2023).

46. Larry Henry, *Allen Glick, 1970s Owner of Las Vegas Casinos Skimmed by Mob, Has Died*, MOB MUSEUM (Aug. 7, 2021), <https://themobmuseum.org/blog/allen-glick-1970s-owner-of-las-vegas-casinos-skimmed-by-mob-has-died/>.

47. Wallace Turner, *U.S. and Nevada Agents Crack Down on Casinos*, N.Y. TIMES (Jan. 28, 1984), <https://www.nytimes.com/1984/01/28/us/us-and-nevada-agents-crack-down-on-casinos.html>.

and other illegal criminal infiltration and involvement in this country's legal gaming businesses with both federal and state laws securely in place. Major hotel corporations and other well-established corporations are now managing those hotel/casinos around the country. But there will always be criminals who think they are smarter and more cunning than the feds, and that they can outsmart us with their criminal schemes and conspiracies. Our answer to them is, "OK guys. Step up and try us out. See what happens!"

Thank you for letting me participate in this symposium, and I wish you all tremendous successes in whatever field of law you decide to enter. But, don't overlook the FBI! Lawyers and accountants are always in strong demand and the salaries are competitive with other segments of the legal field. It's an exciting and very rewarding career.