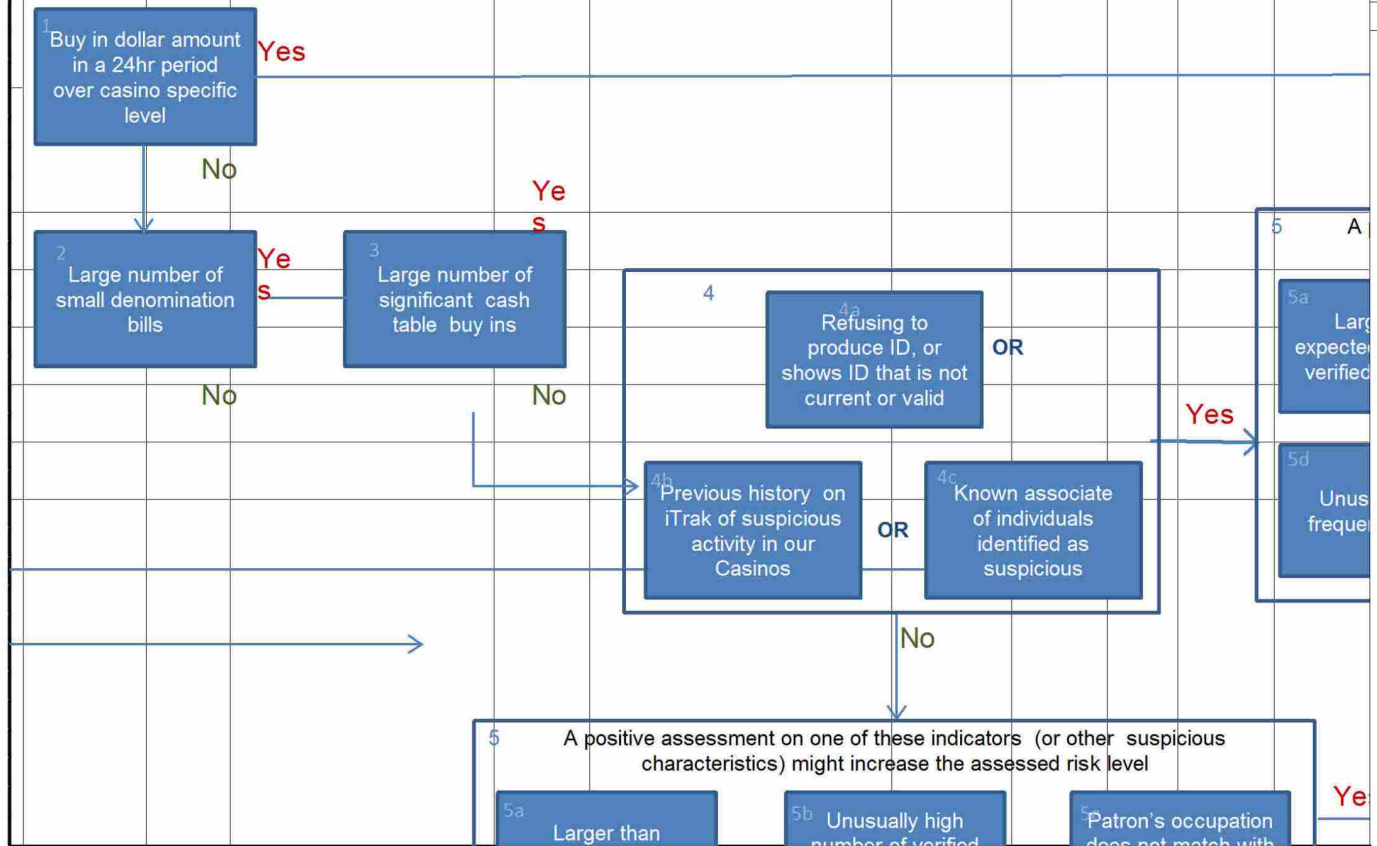
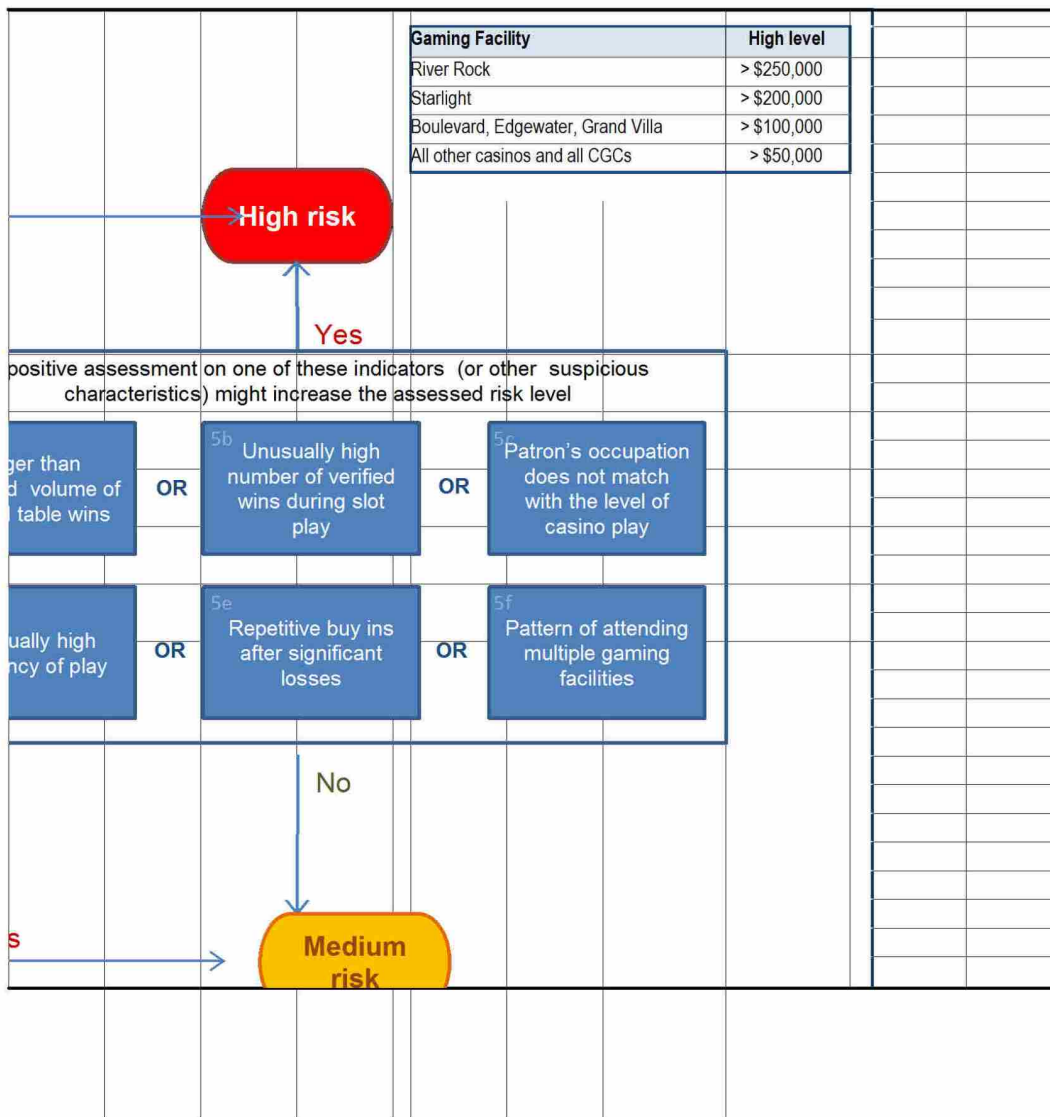


bcl Patron Risk Decision Tree





			5d Unusually high frequency of play	OR	5e Repetitive buy ins after significant losses	OR	5f Pattern of attending multiple gaming facilities	No

[illegible]

bclc Patron Risk Decision Tree Factors				Scenarios that cou
Group 1		Group 2	Group 3	
Buy in dollar amount in a 24hr period over casino specific level	✓	Large number of small demomination bills	Large number of significant cash table buy ins	
Buy in over casino specific high risk limit - immediately defined as high risk, no other factors need to be considered				
Group 1		Group 2	Group 3	
Buy in dollar amount in a 24hr period over casino specific level	✗	Large number of small demomination bills	Large number of significant cash table buy ins	✓
Buy in under the casino specific high risk limit, but large number of small denomination bills AND significant number of cash buy ins, should be considered high risk, with no other factors required				
Group 1		Group 2	Group 3	
Buy in dollar amount in a 24hr period over casino specific level	✗	Large number of small demomination bills	Large number of significant cash table buy ins	✗

Id lead to an assessment of high risk		High risk					
Group 4		Group 5					
Refusing to produce ID, or shows ID that is not current or valid		Larger than expected volume of verified table wins					
Previous history on iTrak of suspicious activity in our Casinos		Unusually high number of verified wins during slot play					
Known associate of individuals identified as suspicious		Patron's occupation does not match with the level of casino play					
		Unusually high frequency of play					
		Repetitive buy ins after significant losses					
		Pattern of attending multiple gaming facilities					
Group 4		Group 5					
Refusing to produce ID, or shows ID that is not current or valid		Larger than expected volume of verified table wins					
Previous history on iTrak of suspicious activity in our Casinos		Unusually high number of verified wins during slot play					
Known associate of individuals identified as suspicious		Patron's occupation does not match with the level of casino play					
		Unusually high frequency of play					
		Repetitive buy ins after significant losses					
		Pattern of attending multiple gaming facilities					
Group 4		Group 5					
Refusing to produce ID, or shows ID that is not current or valid	✓	Larger than expected volume of verified table wins	✓				
	ANY ONE		ANY ONE				

	Buy in under the casino specific high risk limit, and EITHER large number of small denomination bills OR significant number of cash buy ins - additional risk factors from group 4 AND group 5 should be considered in order to determine whether to include in the high risk group.		
	If there is a reason not included in this tree that leads an investigator to believe that a patron should be with the Manager or Assistant Manager, Casino Security and Surveillance and the rationale clearly rec		

Previous history on iTrak of suspicious activity in our Casinos		Unusually high number of verified wins during slot play						
Known associate of individuals identified as suspicious	✓	Patron's occupation does not match with the level of casino play	✓					
		Unusually high frequency of play	ANY ONE					
		Repetitive buy ins after significant losses						
		Pattern of attending multiple gaming facilities						
considered as a high risk this should be discussed								
orded.		This edition (V3) agreed on the 11th January 2013						

IDENTIFYING INDIVIDUALS WHO MIGHT BE MEDIUM RISK FOR MONEY LAUNDERING**ISSUES RELATED TO BACKGROUND**

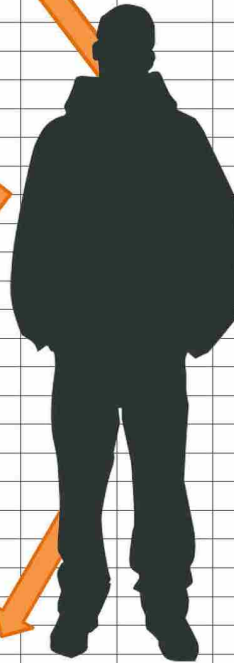
- Has known associates who are deemed suspicious by the gaming facilities

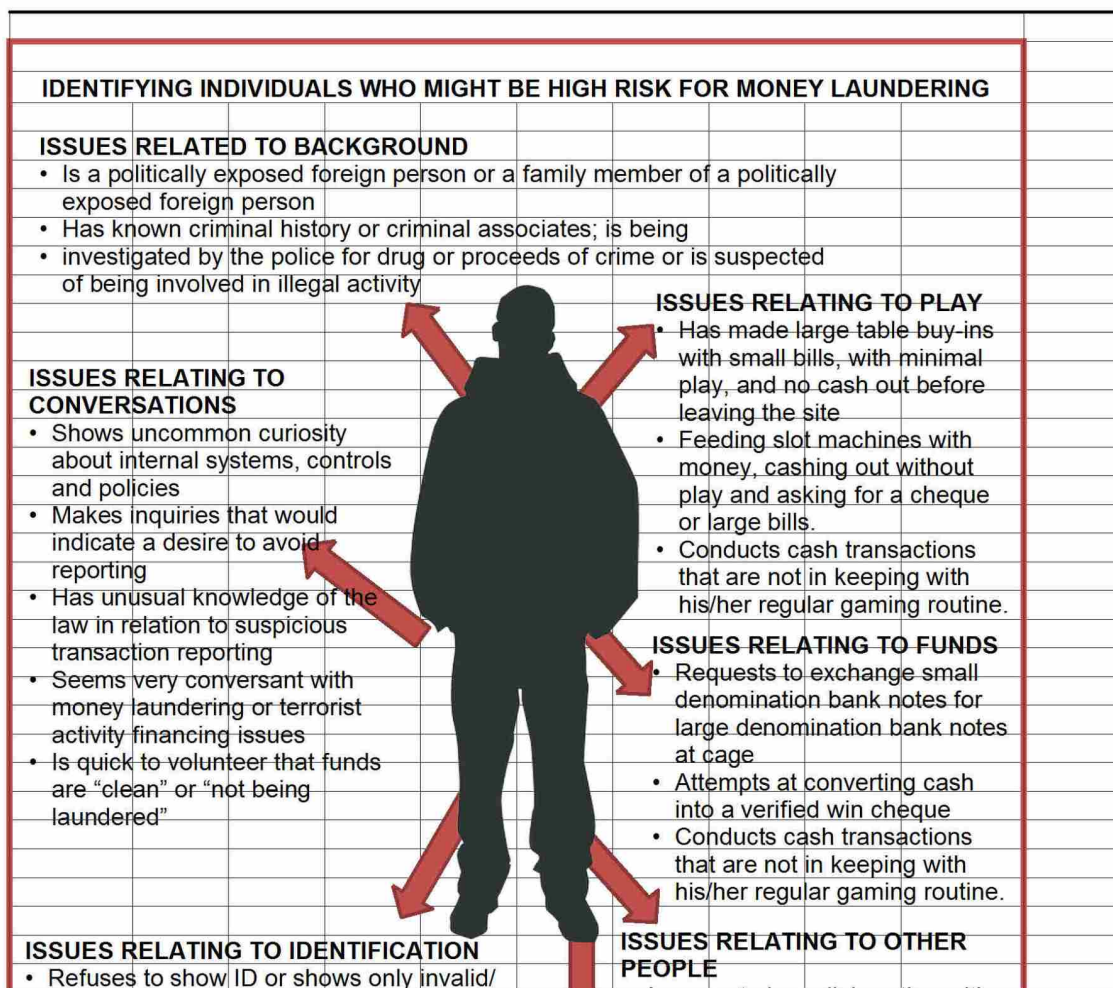
ISSUES RELATING TO PLAY

- Has unusual play for the individual (e.g., sudden increase in frequency or amount of money played)
- Has unusual play for the location (e.g., higher than average buy-in for that gaming location)
- Has a large volume of verified win cheques on tables or slots
- Has a pattern of attending multiple gaming

ISSUES RELATING TO FUNDS

- Has a history of small denomination/large buy-ins
- Has a large volume of verified win cheques on tables or slots
- Has large chip-ins at the table with no recent activity or history of play to explain the source of the chips
- Has unusual transaction history/activity with a PGF





[illegible]

ANTI-MONEY LAUNDERING - IDENTIFYING

MODERATE RISK

ISSUES RELATED TO BACKGROUND

- Has known associates who are deemed suspicious by the gaming facilities

ISSUES RELATING TO PLAY

- Has unusual play for the individual (e.g., sudden increase in frequency or amount of money played)
- Has unusual play for the location (e.g., higher than average buy-in for that gaming location)
- Has a large volume of verified win cheques on tables or slots
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ISSUES RELATING TO FUNDS

- Has a history of small denomination/large buy-ins
- Has a large volume of verified win cheques on tables or slots
- Has large chip-ins at the table with no recent activity or history of play to explain the source of the chips

HIGH RISK

Any patron with a history of 2 or more

ISSUES RELATED TO BACKGROUND

- Is a politically exposed foreign person or
- Has known criminal history or criminal a
- Investigated by the police for drug or pr

ISSUES RELATING TO PLAY

- Has made large table buy-ins with minimal play, and no cash out site
- Feeding slot machines with money without play and asking for a
- Conducts cash transactions that are not with his/her regular gaming record

ISSUES RELATING TO OTHER P

- Appears to be collaborating with others in keeping, client identification or re
- Lends cash/chips that give suspicion related to "Loan Sharking".
- Loiters in the high limit room, and attempts to associate with VIP players
- Places a phone call and an unknown person drops off a large sum of money to

Other

- Any other

ATRONS - WHAT TO LOOK OUT FOR

or more suspicious transactions is considered high risk

or a family member of a politically exposed foreign person
 associates; is being
 proceeds of crime or is suspected of being involved in illegal activity

ISSUES RELATING TO CONVERSATIONS

with small bills, with
 t before leaving the

money, cashing out
 cheque or large bills.
 at are not in keeping
 routine.

PEOPLE

others to avoid record
 reporting thresholds
 cion to believe it is

d associates with or
 layers.

own vehicle/patron
 o the patron.

- Shows uncommon curiosity about internal systems, controls and policies
- Makes inquiries that would indicate a desire to avoid reporting
- Has unusual knowledge of the law in relation to suspicious transaction reporting
- Seems very conversant with money laundering or terrorist activity financing issues
- Is quick to volunteer that funds are "clean" or "not being laundered"

ISSUES RELATING TO FUNDS

- Requests to exchange small denomination bank notes for large denomination bank notes at cage
- Attempts at converting cash into a verified win cheque
- Conducts cash transactions that are not in keeping with his/her regular gaming routine.

factors that FINTRAC advises should be considered as high risk flags

casino transaction of \$3,000 or more when an individual receives payment in casino cheques made out to

ANTI-MONEY LAUNDERING - IDENTIFYING HIGH RISK PATRONS - WHAT TO LOOK OUT

HIGH RISK

Any patron with a history of 2 or more suspicious transactions is considered high risk

● ISSUES RELATING TO PLAY

- Has made large table buy-ins with small bills, with minimal play, and no cash out before leaving the site
- Feeding slot machines with money, cashing out without play and asking for a cheque or large bills.
- Conducts cash transactions that are not in keeping with his/her regular gaming routine.

● ISSUES RELATING TO FUNDS

- Requests to exchange small denomination bank notes for large denomination bank notes at cage
- Attempts at converting cash into a verified win cheque
- Conducts cash transactions that are not in keeping with his/her regular gaming routine.

● ISSUES RELATING TO OTHER PEOPLE

- Appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds
- Lends cash/chips that give suspicion to believe it is related to "Loan Sharking".
- Loiters in the high limit room, and associates with or attempts to associate with VIP players.
- Places a phone call and an unknown vehicle/patron drops off a large sum of money to the patron.

● ISSUES RELATED TO BACKGROUND

- Is a politically exposed foreign person or a family member of a politically

HIGH RISK PATRONS - WHAT TO LOOK OUT FOR

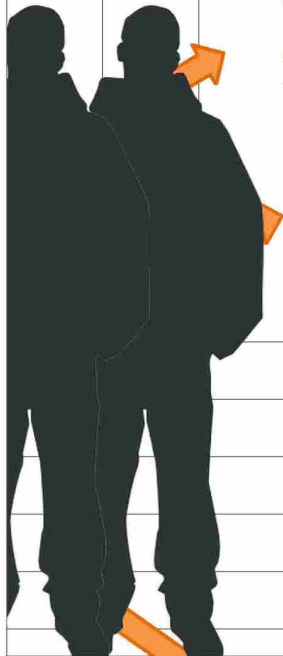
MODERATE RISK

● ISSUES RELATING TO PLAY

- Has unusual play for the individual (e.g., sudden increase in frequency or amount of money played)
- Has unusual play for the location (e.g., higher than average buy-in for that gaming location)
- Has a large volume of verified win cheques on tables or slots
- Has a pattern of attending multiple gaming

● ISSUES RELATING TO FUNDS

- Has a history of small denomination/large buy-ins
- Has a large volume of verified win cheques on tables or slots
- Has large chip-ins at the table with no recent activity or history of play to explain the source of the chips
- Has unusual transaction history/activity with a PGF
- Performs two or more cash transactions of less than \$10,000 each just outside of 24 hours apart, seemingly to avoid the 24-hour rule
- Starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the client in the past
- Has access to large amounts of cash after banking hours on short notice



● **ISSUES RELATING TO IDENTIFICATION**

- Refuses to show ID or shows only invalid/ expired ID
- Produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate
- Provides doubtful or vague information
- Occupation does not match the level or type of play with no known explanation for the difference
- Attempts to avoid being identified under the FINTRAC large cash transaction policy.
- Appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds

Other factors

- Client requests
- Client attempts
- Client requests
- Client purchases creating a perce
- Client puts mo
- Client exchange cheques.
- Client is knowr
- Transaction se
- Transaction ap
- viable for the cli

[illegible]

