

BAD RIVER BAND OF LAKE SUPERIOR TRIBE OF CHIPPEWA INDIANS

CHIEF BLACKBIRD CENTER

P.O.Box 39 • Odanah, Wisconsin 54861

RESOLUTION NO. 11-18-10-316

Approving Internal Control Standards Section 560.20 - Title 31 Compliance Program

WHEREAS: the Bad River Band of the Lake Superior Tribe of Chippewa Indians is a federally recognized Indian tribe with a Constitution enacted pursuant to the Indian Reorganization Act of 1934, 25 U.S.C. Section 476; and

WHEREAS: Article VI, Section 1(m) of the Bad River Constitution authorizes the Bad River Tribal Council to adopt resolutions regulating the procedures of Tribal agencies and Tribal officials, including the proper operation and conduct of the Band's gaming operations; and

WHEREAS: Federal regulations at 25 C.F.R. Part 542 provide that the Tribal gaming operation comply with such standards and procedures by developing suitable Internal Control Standards to protect Tribal assets, the interests of Tribal members, and the gaming public; and

WHEREAS: the Gaming Facility has prepared the Tribe's Internal Control Standards Section 560. to include the following:

SECTION 560. Title 31 Compliance Program.

NOW, THEREFORE, BE IT RESOLVED that the Bad River Tribal Council hereby approves Section 560.20 – Title 31 Compliance Program.

CERTIFICATION

I, the undersigned, as Secretary of the Bad River Band of the Lake Superior Tribe of Chippewa Indians, an Indian Tribe organized under Section 16 of the Indian Reorganization Act, hereby certify that the Tribal Council is composed of seven members, of whom 6 members, constituting a quorum, were present at a meeting hereof duly called, noticed, convened, and held on the 18 day of November, 2010; that the foregoing resolution was duly adopted at said meeting by an affirmative vote of 5 members; 0 against; and 0 abstaining, and that the said resolution has not been rescinded or amended.

Loretta Ford

Loretta Ford, Secretary
Bad River Tribal Council

Resolution No. 11-18-10-316

Approving Internal Control Standards Section 560.20 – Title 31 Compliance Program

Title 31 Compliance Program – Requirement that Casinos and Card Clubs Report Suspicious Transactions

STANDARD

It is the auditor's determination that the casino is out of compliance with NICC MICS section 542.36(2): Contain standards for currency transaction reporting that comply with 31 CFR part 103 (Title 31).

Repeat finding.

The Tribal MICS does not contain a section for Title 31. The Casino has a compliance program for Title 31.

Management Response.

Update Title 31 compliance program and recommend that it be approved and put into the Tribal MICS.
(NOTE: Title 31 program is in effect at casino now.)

Status - Unresolved:

Waiting for approved Tribal MICS revision from Gaming Commission.

CORRECTION

Item: Submit Title 31 Compliance Program to Gaming Commission

Needed: Gaming Commission Approval – for Title 31 Compliance Program – to be adopted into Tribal MICS.

Correction Action Sought:

Gaming Commission Review – and approval of a Title 31 Compliance Program – to be adopted into the Tribal MICS. Resolution needed to cite approval.

Title 31 Compliance Program

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Page 1

This manual is designed to ensure the Bad River Casino has a system of internal controls and training tools that not only comply with Title 31 requirements, but discourages criminals involved in money laundering activities. This manual is also designed to serve as a management tool that can be used to track large cash transactions throughout the Casino.

Bad River Casino accepts the fact by nature the gaming industry is a possible target for criminals involved in money laundering activities; therefore Bad River Casino will use this compliance program in order to fully participate with government agencies that are responsible for the investigation of such financial crimes.

Bad River Casino also recognizes that any sort of illegal activity can severely compromise the integrity of our Casino; hence, jeopardizing the integrity of the Bad River Casino Community at large. This program will allow Bad River Casino to protect the integrity of our Casino Enterprise as well as the integrity of the Bad River Casino employees.

Section I: Title 31 Purpose and Intent

Former President Richard M. Nixon signed the Bank Secrecy Act/Title 31 into effect on October 26, 1970. Title 31 is designed to discourage criminals involved in money laundering activities. Originally intended to monitor countries banking industry, the Bank Secrecy Act/Title 31 proved a successful deterrent of these financial crimes, by requiring banks to report certain CASH transactions. Criminals were then forced to look elsewhere for viable business to conduct these financial crimes. Since the main commodity of the gaming industry is money, criminals looked at casinos as a convenient place to launder their dirty monies.

In response to the success of Title 31 in the banking industry, the government implemented the requirements of Title 31 to the gaming industries of Atlantic City, New Jersey, and Puerto Rico while Nevada adopted their own version of Title 31 known as regulation 6. Now, due to the expansion of gaming in other states and Indian territories effective August 1, 1996, gaming facilities on Indian territories, as well as, Native American casinos will be subject to the requirements and provisions of Title 31.

It will be the responsibility of the Tribal Leadership to ensure that the specific processes and requirements of Title 31 are being met and any failure to comply with provisions can result in penalties imposed on the gaming facility, gaming employees, by the federal government, as well as the tribal government.

Section II: Bad River Casino's Compliance Officer

The following are the duties and responsibilities of the Compliance Officer:

- Participate in training and scheduling employees
- Coordinate critical decisions with Compliance Committee
- Design all compliance forms and documentation
- Review documents with cash reporting activity
- Review, sign, and send all CTR's
- Keep files on all documentation
- Contact person for IRS
- Ensure that all problems and exceptions are resolved
- Investigate incidents of non-compliance and take action
- Coordinate IRS Audits

The Compliance Officer, will report status to management and Compliance Committee. All exception reports will be routed to Bad River Casino Internal Audit Department.

Copies of all daily logs, and copies of CTR'S will be sent to the Accounting Office, to ensure that record keeping is complete.

Section III: Penalties for Non-Compliance to Title 31

The following penalties may be imposed on casinos, as well as casino employees who are found to be willfully violating Title 31 requirements:

Civil Penalties

- Between \$25,000 and \$100,000 against the casino, any partner, director, officer or employee for willful violations of Title 31;
- Up to \$1,000 for record keeping violations;
- All of the above may be imposed in addition to the criminal penalties discussed below;

Criminal Penalties

- Up to \$10,000 and/or 5 years imprisonment for record keeping violations;
- Up to \$25,000 and/or 5 years imprisonment for willful violations of Title 31;
- Up to \$500,000 and/or 10 years imprisonment if in conjunction with other federal violations.

In-House Disciplinary Measures

The Bad River Tribal Council Board and Bad River Casino management understand that the requirements and provisions of Title 31 are designed to protect the integrity and reputation of Bad River Casino and the Bad River Band of Lake Superior Chippewa.

Any employee of Bad River Casino or employee of the Bad River Reservation doing business with the Bad River Casino found to be willfully violating the provisions and requirements of the Bad River Casino Title 31 Compliance Program will be subject to disciplinary actions described in Section F of the Bad River Gaming Operations General Policies and Procedures.

Section IV Title 31 Internal Control Systems

In an effort to ensure that The Bad River Casino is in full compliance with the provisions and requirements of Title 31 Casino management has developed and implemented an internal control system that will monitor all large monetary transactions and activities that may violate the requirements of Title 31.

This section is broken up into the following parts:

1. Requirements of Title 31
2. Handling and Documenting of Currency Transactions
3. Special Rules for Casinos
4. Bad River Casino's Internal Control

Each of these areas will be examined and Bad River Casino will identify the in-house policy and procedure that procedure to ensure Bad River Casino's compliance with Title 31 requirements.

1. WHAT ARE THE REQUIREMENTS UNDER THE LAW?

- A. Title 31 states that "Each Casino shall file a report of each transaction in currency, involving either cash-in or cash-out of more than \$10,000."
- B. Transactions in currency involving cash-in at the Casino would be:
 1. Purchase of chips or tokens
 2. Exchanges of currency for currency, including foreign currency.
 3. Cash for casino checks.
- C. Transactions in currency involving cash-out at the casino include:
 1. Purchase of chips or tokens.
 2. Cashing of checks or other negotiable instruments.
 3. Exchanges of currency for currency, including foreign currency.
 4. Reimbursement for customer's travel and entertainment expenses by the casino.
 5. Payments on bets (including Jackpot payouts).

2. HOW WILL CURRENCY TRANSACTIONS BE HANDLED AND DOCUMENTED?

The law states that "multiple currency transactions shall be treated as a single transaction, if the casino has knowledge that they are by or on behalf of any person and result in either cash-in or cash-out totaling more than \$10,000 during the gaming day."

- A. The law states that "all records, documents, manuals required to be maintained...under regulations of any governing Indian tribe, tribal government, or terms of any Tribal/State gaming compact entered into pursuant to Indian Gaming Regulatory Act...must maintain in accordance with Title 31."

Title 31 Compliance Program

- B. The law requires the casino to maintain "all records which are prepared or used by a casino to monitor a customer's gaming activity."
 - C. The law requires the casino to maintain "a separate record containing a list of each transaction between the casino and its customers, involving the following types, having a face value of \$3,000 or more. This includes transactions of cash-in or cash-out involving:
 1. Personal checks.
 2. Business checks (including casino checks).
 3. Official bank checks.
 4. Cashier's checks.
 5. Third party checks.
 6. Traveler's checks.
 7. Money Orders.
 - D. The list "will contain the time, date and the amount of the transaction; the name and permanent address of the customer; the type of instrument; the name of drawee or the issuer of the instrument; all reference numbers (check number) and name of the employee who conducted the transaction. Applicable transactions will be placed on a list in chronological order in which they occur."
 - E. The Casino must maintain "a copy of the compliance program."
 1. Casinos which input, store, or retain, in whole or part, any record required to be maintained...on computer disk, tape or other machine readable media.
 2. All indexes, books, programs, record layouts, manuals, formats, instructions, file descriptions, and similar materials, which would enable a person to readily access and review that are described. That are input, stored, or retained on computer disk for a period of time such records are required to be retained.
- ### 3. SPECIAL RULES FOR CASINOS
- The laws says that "each casino shall develop and implement a written program reasonably designed to assure and monitor compliance with the requirements ... "Set forth in the code."

A. The Compliance Program must provide for:

1. A system of internal controls to assure on-going compliance.
2. Internal or external testing for compliance.
3. Training of casino personnel, including training in the identification of unusual or suspicious transactions/activity, to the extent of reporting of such is required by applicable law, and by the casino's own administration and compliance.
4. An individual or individuals to assure day to day compliance (Compliance Officer).

- i. Procedures for using all available information to determine:
 - a. When required...the name, address, social security number, and other information.
 - b. When required...the occurrence of unusual or suspicious transaction or activity.
 - c. Determine what records must be maintained.
6. For casinos that have the use of automated data processing systems, it is required that automated programs be used in assuring compliance of Title 31.

I. BAD RIVER INTERNAL CONTROL SYSTEM.

The following personnel will comply with the duties and responsibilities shown immediately following the positions:

Cage and Vault Personnel
Table Games Personnel
Slot Personnel
Accounting Personnel

DOCUMENT DESCRIPTION

The following are the four documents that are required by Title 31:

1. **Currency Transaction Report - Form 8362 (CTRC)** - required by the Internal Revenue Service. This form will be distributed to all departments which may encounter transactions reportable under Title 31. A copy of the form will be retained in chronological order.

The Currency Transaction Report contains the following information:

1. Date and time of transaction.
2. Amount of the transaction.
3. Customer's name.
4. Customer's permanent address.
5. Customer's social security number.
6. Driver's license number or valid government identification including name and address.
7. The signature of the person handling the transaction and recording the information.
8. The type of transaction.
9. Signature of the person reviewing the report.

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2. **Suspicious Activity Report for Casinos (SARC)** is a proposed regulation to amend Title 31, and states that every casino shall file any unusual or suspicious activity that is relevant to violation of law or regulation. The SARC will be distributed to all departments which may encounter transactions reportable under Title 31. A copy of this form and all supporting documentation will be retained in chronological order.

Suspicious activities do not always involve currency. Activities pertaining to suspicious transactions include but are not limited to the following:

- Customers engaging in minimal gaming activity without reasonable explanation.
- Structuring currency transactions.
- Providing false identification or false information.
- Pressuring casino employees not to file that required reports.
- Pressuring casino employees to falsely record or report transactions.
- Layering transactions to disguise the source.
- Criminal activity.

The Suspicious Activity Report for casinos contain the following information:

1. Casino reporting information
2. Suspect information
3. Suspicious activity information
4. Law Enforcement Agency information.
5. Witness information.
6. Preparer information
7. Narrative explanation/description.

The contents of the Suspicious Activity Report for casinos must remain confidential. The individual may not be notified that a report has been filed. The contents may not be disclosed to anyone, except to FinCEN or an appropriate government agency.

The following are the other two forms that are used, for the Cage and the Pit, the Monetary Instrument Log and Multiple Transaction Log:

3. Daily Cage Tracking Log

This is a form developed by the casino, which meets requirements of separate record provision of Title 31. It ensures that the casino maintains a list of each of the transactions between the casino and its customers. This will ensure that proper tracking, in which a customer may reach \$3,000 or more a Multiple Transaction Form will be completed. It further ensures that if the customer reaches more than \$10,000, a CTR is completed. The following transaction will be noted on the log:

1. All taxable jackpots.
2. Exchange for foreign currency.
3. Exchange of currency for currency.
4. Large cash in blackjack chips.

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ
الْكِتَابُ مِنْ رَبِّ الْعَالَمِينَ

رَبِّ الْمُمْلَكَاتِ عَالِيَّاتِ عَالِيَّاتِ وَالْمُنْتَهَىٰ بِهِ مَعْلُومٌ لِّغَيْرِهِ مَنْ يَرَى

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The Daily Cage Tracking Log contains the following information:

1. Date and time of the transaction.
2. Amount of the transaction.
3. Name and permanent address of the customer.
4. The type of transaction.
5. The name and badge number of casino employee conducting the transaction and placed on a list in the chronological order in which they occur.
6. Signature of the person reviewing the report.

C. Cage/Pit Multiple Transaction Log

This is a one-part log maintained in the cashier cage for the purpose of recording information relative to cage cash transactions of \$3,000 or more. The logs will be submitted to the Compliance Officers box, in the casino Administration Office. The logs will be filed chronologically and kept for retention, and available for inspection by the Internal Revenue Service.

The Cage Multiple Transaction Log contains the following information:

1. Name, address, and social security number of the customer.
2. Time, date, type and amount of transaction \$3,000 or greater until the conclusion of the normal gaming day or when a transaction exceeds \$10,000 at which time the reporting requirements of Title 31 are to be enforced.

NOTE: Transactions less than \$3,000 may be recorded if personnel have actual knowledge that the amounts may accumulate to become a reportable transaction.

3. Signature of cage personnel recording each transaction.

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REQUIRED PROCEDURES

Vault Department

When a transaction meets the recording or reporting requirements, the following transaction description will be performed. Transaction includes the sale, redemption or exchange of currency, chips, tokens, coins or foreign currency \$3,000 or greater.

Responsibility

Patron

Procedure

1. Presents media for redemption or purchase with an employee that meets the criteria outlined above.
2. Initiates the procedures for recording or reporting requirements of Title 31. Reminder: Record transactions at \$3,000, on the Multiple Transaction Log. Report if the patron reaches \$10,000 or more on the CTRC.

NOTE: If the patron is going to reach \$10,000 or more and information is not available, for the CTRC you must ask for the information. If the information cannot be obtained the transaction will be terminated. In the case, of a dispute, the Floor Supervisor will be notified.

Note: As an option to requesting the necessary identification and other data from "well known" patrons, a card file is maintained where the required information has been recorded. The card file is used whenever appropriate for preparation of the Currency Transaction Report or Multiple Transaction Log.

Vault Personnel

3. Subsequent to obtaining assurance that the transaction can be properly recorded, all required information in the document description section is entered on CTRC or MTL.

Vault Personnel

4. Complete the transaction with the patron. Ensures that the CTRC/MTL is sent to the Compliance Officer on a timely basis.

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CAGE MULTIPLE TRANSACTION CONTROLS

To prevent the circumvention of Title 31 by multiple transactions in a gaming day, The Vault Department will employ the following procedures:

Responsibility

Vault Personnel

Procedure

1. At the beginning of each shift vault personnel will review the cage Multiple Transaction Log to become familiar with descriptions of individuals whose transactions are being monitored.
2. When a patron participates in a transaction \$3000 or greater in a gaming day, their cage transactions will be monitored for possible reporting requirements. The log will be completed using the document description section for tracking purposes. Additionally, other cage personnel will be notified that the monitoring has been initiated.
3. As each succeeding transaction occurs with individuals being monitored, the log will be completed with the information in the document description section.
4. When the total of the transaction for individual patrons exceeds \$10,000, the reporting requirements of Title 31 are enforced.
5. At the conclusion of the normal business gaming day, a new log is started and information on the previous log is erased.
6. Transmits Multiple Transaction Logs to Compliance Officer in a timely manner.

TABLE GAMES DEPARTMENT

Responsibility

Patron

Procedure

1. Presents cash, to an employee, in exchange for chips totaling \$3000 or larger.

Dealer

2. Informs Pit Supervisor of the pending transaction.

Pit Supervisor

3. Initiates the procedure for the recording reporting requirements of Title 31. If the patron decides to proceed with the transaction, then go to Step 4. If the patron decides not to participate no reports will be maintained.

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<u>Responsibility</u>	<u>Procedure</u>
Pit Supervisor	<ol style="list-style-type: none">1. Prior to completing the transaction, obtains patron's name, address, and social security number. In the case of dispute, the Floor Supervisor will be notified. <p>NOTE: An option to requesting the necessary identification and other data from "well known" patrons, a card file is maintained of the required information and may be used, when appropriate, to prepare the MTL and CTRC.</p> <ol style="list-style-type: none">2. Prior to completing the transaction, verifies the patron's name, address, social security number, identity credential on the Pit Multiple Transaction Log or Currency Transaction Report.3. Subsequent to obtaining assurance that the transaction can be properly recorded, all required information in the document description listed above is entered on the Pit Multiple Transaction Log or the Currency Transaction Report.
Dealer	<ol style="list-style-type: none">4. Consummates the transaction with the patron.
Pit Supervisor	<ol style="list-style-type: none">5. Transmits the MTL/CTRC to the Compliance Officer in a timely manner.

PIT MULTIPLE TRANSACTION CONTROLS

To prevent the circumvention of Title 31 by multiple transaction in a gaming day, the Blackjack Department will employ the following procedures:

<u>Responsibility</u>	<u>Procedure</u>
Pit Supervisor	<ol style="list-style-type: none">1. At the beginning of each shift, pit supervisor personnel will review multiple transaction logs in process to become familiar with the description of individuals being monitored.
Dealer	<ol style="list-style-type: none">2. Informs Pit Supervisor when cash transaction of \$3,000 or greater occurs.
Pit Supervisor	<ol style="list-style-type: none">3. Records information in Pit Multiple Transaction Log as required in the description section. Examines other log entries to ensure that other aggregated totals for that patron for the normal gaming day has not been exceeded \$10,000.
Pit Supervisor	<ol style="list-style-type: none">4. At the conclusion of the normal gaming day, new logs are started and the recording of information on the previous day is ceased.

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- j. Transmits MTL or CTRC's to the Compliance Officer on a timely manner.

SLOTS DEPARTMENT

The Slot Department completes a one part Multiple Transaction Log & Suspicious Activity Report, on a daily basis. The Slot Department does not have an excessive amount of currency, to do large currency transactions. The department is a source of reporting unusual or suspicious activity on the gaming floor.

The Multiple Transaction Log & Suspicious Activity Report is treated in the same manner as the Multiple Transaction Logs, for the Vault and the Blackjack Department. The form ensures that any possible suspicious activity is being monitored.

The Slot Department personnel communicates with the Vault, whenever there is questionable activity, the cage starts to monitor the patron's cash in amounts.

<u>Responsibility</u>	<u>Procedure</u>
Slot Personnel	<ol style="list-style-type: none"> 1. Notifies the Lead Slot Attendant, of any suspicious activity on the gaming floor. (Ex. Patron is putting in currency in the bill validator, and cashes out without playing machine. Ex. Patron wins a reportable jackpot and tries to use another individual's identification.)
Lead Slot Attendant	<ol style="list-style-type: none"> 2. Completes entry on the Multiple Transaction Log & Suspicious Activity Report. The entry will include the following information: <ol style="list-style-type: none"> 1. Time. 2. Transaction. 3. Machine number. 4. Name (if known). 5. Description. 3. At the end of the shift will sign the form, and review with the on coming Lead Slot Attendant. <p>Note: Any information on suspicious activity must be reported to the on duty Vault Shift Supervisor. If there is reason to believe that suspicious activity took place a Suspicious Activity Report by Casinos Form TD F 90-22-49 must be completed, and filed with the Internal Revenue Service.</p> <ol style="list-style-type: none"> 4. Transmits the daily Multiple Transaction Log and Suspicious Report with the Compliance Officer, in a timely manner.

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Suspicious Activity Report for Casinos, is the responsibility of all casino personnel to report. Suspicious Activity may be different than how another would perceive, the activity. Use the materials outlined in this manual and common sense when dealing with suspicious activity.

Responsibility

Casino Personnel

Procedure

1. Upon the detection of suspicious activity, notify surveillance of the suspicious activity, and obtain the Suspicious Activity Report from the department manager, compliance officer or the floor supervisor.
2. Monitor the suspicious activity.
3. Complete the Suspicious Activity Report for casinos according to the instructions on the form.

Surveillance

Casino Personnel

NOTE: The Suspicious Report for casinos must be completed as the instructions state, it will be returned if it is not completed as directed.

1. Copies of the Suspicious Activity Report for casinos need to be submitted to the gaming manager and the compliance officer. (Compliance officer will send copy to the Accounting Dept.)
2. Submit original Suspicious Activity Report for casinos to the FinCEN in Detroit Michigan, within 30 calendar days of the detection of suspicious activity.

NOTE: When mailing the SARC, it should be done by registered mail. The Administration will stamp your envelope for postage and help you fill out the card.

3. File the copy of the SARC and any supporting documentation in chronological order and maintain so that it is readily available for inspection by the FinCen. Retain documentation for 5 years.

Accounting Department/ Compliance Officer

INTERNAL AUDIT

As part of the internal audit procedures performed, compliance with the provisions of Title 31 are tested at least quarterly. The testing includes the following:

- Compare W2-G reports with CTRC's and MTI's to ensure jackpots \$3,000 or more are properly recorded and/or reported.
- Compare daily pit records with CTRC's and MTL's to ensure pit transactions \$3,000 or more are properly reported and/or recorded.
- Review player tracking top 2000 to determine suspicious activity and/or patterns.
- Check personnel records for completion of Title 31 training.

All exceptions that are discovered are documented and are forwarded to Bad River Management and the Accounting Department, for non-compliance.

Exception Reports that are routed to the Internal Audit Department must be reviewed to ensure that corrective action was taken.

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KEY TERMINOLOGY

Business Year - the annual accounting period by which a casino maintains its books and records.

Casino - any organization licensed to do business as a casino or gambling casino in the United States and having a gross annual revenues in excess of \$1 million . It includes the principle headquarters and every domestic branch or other place of business of the casino.

Currency - the coin and currency of the United States or any other country that circulates and is customarily used and accepted as money in the country that it is issued. It includes United States silver certificates, United States notes, Federal Reserve notes and official foreign bank notes, but does Not include bank check and notes or other negotiable instruments not customarily accepted as money.

Customer - every person who is involved in a transaction which Title 31 applies, whether or not that person participates in the gaming activities offered by the casino.

Filing Deadline/Requirements - a Currency Transaction Report (Form 8362) for each transaction in currency, involving either cash in or cash out, of more than \$10,000 must be filed with the IRS by the 15th date after the transaction. Casinos may report both cash in and cash out transactions by or on behalf of the same customer on a single CTRC form.

Gaming Day - the normal business day of the casino. For 24-hour operations that 24 hour period by which the casino keeps its books and records.

"Knowledge of Cash Transactions" - a casino shall be deemed to have the knowledge if: any sole proprietor, partner, officer, director, or employee of the casino, the employee acting within the scope of his or her employment , has knowledge that such multiple currency transactions have occurred, information retained on magnetic disk, tape, or other machine readable media, or in any manual system, and similar documents and information that such multiple currency transactions occurred.

Money Laundering - the disguising or concealing of illicit income in order to make it appear legitimate. Illegal drugs are purchased with large amounts of currency. Just in case the currency has been "marked" by the federal government during preplanned "sting" operations, the drug dealers want to get rid of (i.e. launder) this currency for new, "clean" currency that is not marked. Banks and casinos are generally used by drug dealers to "wash" or "launder" their monies from drug transactions. Also, utilizing a bank or a casino sometimes works to provide a "legitimate" look to the transaction.

Multiple Transaction - single and /or multiple transactions totaling more than \$10,000 during any gaming day. All cash-in or all cash-out transactions must be aggregated (kept track of) on a multiple transaction log in order to determine if the \$10,000 threshold has been attained. "Cash-in" transactions are to be aggregated with other "cash-in" transactions. "Cash-out" transactions are only to be aggregated with other "cash-out" transactions unless it is a cash exchange transaction. "Cash-in" or "cash-out" transactions greater than \$3,000 MUST be logged and tracked on a multiple transaction log. MOST IMPORTANTLY: Casinos must have actual knowledge of the existence of the multiple transactions before they are required to track these transactions.

Negotiable Instruments - for purposes of the Currency Transaction Report, negotiable instruments are all checks (including personal, business, bank, cashier's and third party checks), money orders, traveler's checks, certificates of deposit, and promissory notes.

Title 31 Compliance Program

KEY TERMINOLOGY (CONT.)

Person - an individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture, or other unincorporated organization or group, and all entities treated as legal personalities.

Transaction in Currency - a transaction involving the physical transfer of currency from one person to another. A transaction in currency does not include a transfer of funds by means of bank check, bank draft, wire transfer, or written order that does not include the physical transfer of currency.

Form 3362

Rev. July 1997

Department of the Treasury
Internal Revenue Service

Currency Transaction Report by Casinos

► Use this revision for reportable transactions occurring after June 10, 1987.

► Please type or print.

(Complete all applicable parts—see instructions.)

OMB No. 1506-0005

1 If this Form 3362 (CTR) is submitted to amend a prior report check here: and attach a copy of the original CTR to this form.**Part I Person(s) Involved in Transaction(s)****Section A—Person(s) on Whose Behalf Transaction(s) Is Conducted (Customer)**

1 Individual's last name or Organization's name			4 First name		2 <input type="checkbox"/> Multiple persons	
					\$ M.I.	
5 Permanent address (number, street, and apt. or suite no.)			7 SSN or EIN			
8 City	9 State	10 ZIP code	11 Country (if not U.S.)	12 Date M M D O Y Y Y of birth		
13 Method used to verify identity: a <input type="checkbox"/> Examined identification credential/document			b <input type="checkbox"/> Known customer - information on file	c <input type="checkbox"/> Organization		
14 Describe identification credential: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other			e Issued by f Number			
15 Customer's Account Number						

Section B—Individual(s) Conducting Transaction(s) — If other than above (Agent)

16 Individual's last name			18 First name		19 M.I.	
20 Permanent address (number, street, and apt. or suite no.)			21 SSN			
22 City	23 State	24 ZIP code	25 Country (if not U.S.)	26 Date M M D O Y Y Y of birth		
27 Method used to verify identity: a <input type="checkbox"/> Examined identification credential/document			b <input type="checkbox"/> Known customer - information on file			
28 Describe identification credential: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other			e Issued by f Number			

Part II Amount and Type of Transaction(s) (Complete all items that apply.)

30 CASH IN: (In U.S. dollar equivalent)			31 CASH OUT: (In U.S. dollar equivalent)			32 <input type="checkbox"/> Multiple transactions	
a Purchaser(s) of casino chips, tokens, and other gaming instruments	b Deposit(s) (front money or safekeeping)	c Payment(s) on credit (including markers)	d Bet(s) of currency	e Currency received from wire transfer(s) due	f Purchase(s) of casino check(s)	g Currency exchange(s)	
h Other (specify)	i Enter total amount of CASH IN transaction(s) ► \$	j	k	l	m	n	
32 Date of transaction M M D O Y Y Y (See instructions)			33 Foreign currency used _____ Country _____				

Part III Casino Reporting Transaction(s)

34 Casino's trade name		35 Casino's legal name		36 Employer identification number (EIN)			
37 Address (number, street, and apt. or suite no.) where transaction occurred							

38 City

39 Title of approving official	40 Signature of approving official	41 Date M M D O Y Y Y Signature
42 Type or print preparer's name	43 Type or print name of person to contact	44 Contact telephone number

For Paperwork Reduction Act Notice, see page 2.

Cat. No. 62291Z

Form d3362 (Rev. 7-97)

Multiple Persons or Multiple Agents

(Complete applicable parts below if box 2 or box 18 on page 1 is checked.)

Part I Continued**Section A—Person(s) on Whose Behalf Transaction(s) Is Conducted (Customer)**

1 Individual's last name or organization's name	4 First name	5 M.I.		
6 Permanent address (number, street, and apt. or suite no.)	7 SSN or EIN			
8 City	9 State	10 ZIP code	11 Country (if not U.S.)	12 Date M M D D Y Y Y Birth
13 Method used to verify identity: a <input type="checkbox"/> Examined identification credential/document b <input type="checkbox"/> Known customer - information on file c <input type="checkbox"/> Organization				
14 Describe identification credential: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other e Issued by: f Number:				
15 Customer's Account Number				

Section B—Individual(s) Conducting Transaction(s) – If other than above (Agent)

16 Individual's last name	17 First name	18 M.I.		
19 Permanent address (number, street, and apt. or suite no.)	20 SSN			
21 City	22 State	23 ZIP code	24 Country (if not U.S.)	25 Date M M D D Y Y Y Birth
26 Method used to verify identity: a <input type="checkbox"/> Examined identification credential/document b <input type="checkbox"/> Known customer - information on file				
27 Describe identification credential: a <input type="checkbox"/> Driver's license/State I.D. b <input type="checkbox"/> Passport c <input type="checkbox"/> Alien registration d <input type="checkbox"/> Other e Issued by: f Number:				

Paperwork Reduction Act Notice.—The requested information is useful in criminal, civil, and regulatory investigations and proceedings. Financial institutions are required to provide the information under 31 U.S.C. 5313 and 31 CFR Part 103, commonly referred to as the Bank Secrecy Act (BSA). The BSA is administered by the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN). You are not required to provide the requested information unless a form displays a valid OMB control number.

The time needed to complete this form will vary depending on individual circumstances. The estimated average time is 19 minutes. If you have comments concerning the accuracy of this time estimate or suggestions for improving this form, you may write to the Tax Forms Committee, Western Area Distribution Center, Rancho Cordova, CA 95743-0001. DO NOT send this form to this address. Instead, see When and Where To File below.

General Instructions

Form 8362.—Use the July 1997 revision of Form 8362 for reportable transactions occurring after June 30, 1997. Use the May 1992 revision of Form 8362 for reportable transactions occurring before July 1, 1997.

Suspicious Transactions.—If a transaction is greater than \$10,000 in currency as well as suspicious, casinos must file a Form 8362 and are encouraged to report suspicious transactions and activities on Form TDF 00-22.47, Suspicious Activity Report (SAR). Banks and other depository institutions currently are required to use the SAR to report suspicious activities. A SAR for casinos is under development and, once issued, a casino will use this SAR for reporting a suspicious transaction or activity, rather than reporting such activity on Form TDF 00-22.47.

DO NOT use Form 8362 to (1) report suspicious transactions involving \$10,000 or less in currency OR (2) indicate that a transaction of more than \$10,000 is suspicious.

When a suspicious activity requires immediate attention, casinos should telephone 1-800-800-CTRS, Monday through Friday, from 9:00 a.m. to 8:00 p.m. Eastern Standard Time (EST). An Internal Revenue Service (IRS) employee will direct the call to the local office of the IRS Criminal Investigation Division (CID). In an emergency, consult directory assistance for the local IRS CID office.

Who Must File.—Any organization duly licensed or authorized to do business as a casino or gambling casino in the United States (except casinos located in Nevada) and having gross annual gaming revenues in excess of \$1 million must file Form 8362. This includes the principal headquarters and every domestic branch or place of business of the casino.

Note: Nevada casinos must file Form 8352, Currency Transaction Report by Casinos - Nevada (CTRC-N), to report transactions as required under Nevada Regulation 6A.

What To File.—A casino must file Form 8362 for each transaction involving either currency received (Cash In) or currency disbursed (Cash Out) of more than \$10,000 in a gaming day. A gaming day is the normal business day of the casino by which it keeps its books and records for business, accounting, and tax purposes. Multiple transactions must be treated as a single transaction if the casino has knowledge that: (1) they are made by or on behalf of the same person, and (2) they result in either Cash In or Cash Out by the casino totalling more than \$10,000 during any one gaming day. Reportable transactions may occur at a casino cage, gaming table, and/or

slot machine. The casino should report both Cash In and Cash Out transactions by or on behalf of the same customer on a single Form 8362. **DO NOT** use Form 8362 to report receipts of currency in excess of \$10,000 by nongaming businesses of a casino (e.g., a hotel); instead, use Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business.

Exceptions.—A casino does not have to report transactions with domestic banks, currency dealers or exchangers, or commercial check cashers.

Identification Requirements.—All individuals (except employees conducting transactions on behalf of armored car services) conducting a reportable transaction(s) for themselves or for another person must be identified by means of an official or otherwise reliable record.

Acceptable forms of identification include a driver's license, military or military dependent identification cards, passport, alien registration card, state issued identification card, cedula card (foreign), or a combination of other documents that contain an individual's name and address and preferably a photograph and are normally acceptable by financial institutions as a means of identification when cashing checks for persons other than established customers.

For casino customers granted accounts for credit, deposit, or check cashing, or on whom a CTRC containing verified identity has been filed, acceptable identification information obtained previously and maintained in the casino's internal records may be used as long as the following conditions are met. The customer's identity is reverified periodically, any out-of-date identifying information is updated in the internal records, and the date of each reverification is noted on the internal

Form 8362 (Rev. 7-97)

record. For example, if documents verifying an individual's identity were examined and recorded on a signature card when a deposit or credit account was opened, the casino may rely on that information as long as it is reviewed periodically.

When and Where to File.—File each Form 8362 by the 15th calendar day after the day of the transaction with the:

IRS Detroit Computing Center
ATTN: CTRC
P.O. Box J2821
Detroit, MI 48232-5604

A casino must retain a copy of each Form 8362 filed for 5 years from the date of filing. **Penalties.**—Civil and/or criminal penalties may be assessed for failure to file a CTRC or supply information, or for filing a false or fraudulent CTRC. See 31 U.S.C. 5321, 5322, and 5324.

Definitions.—For purposes of Form 8362, the terms below have the following meanings:

Agent. Any individual who conducts a currency transaction on behalf of another individual or organization.

Currency. The coin and paper money of the United States or of any other country that is circulated and customarily used and accepted as money.

Customer. Any person involved in a currency transaction whether or not that person participates in the casino's gaming activities.

Person. An individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture, or any other unincorporated organization or group.

Organization. Person other than an individual.

Transaction in Currency (Currency Transaction). The physical transfer of currency from one person to another.

Negotiable Instruments. All checks and drafts (including business, personal, bank, cashier's, and third-party), traveler's checks, money orders, and promissory notes, whether or not they are in bearer form.

Specific Instructions

Note: Additional information that cannot fit on the front and back of Form 8362 must be submitted on plain paper attached to Form 8362. Type or print the individual's or organization's name and identifying number, date of transaction, and casino's name and employer identification number (i.e., Items 3, 4, 5, 7, 32, 34, 35, and 36) as well as identify the specific item number on all additional sheets. This will ensure that if a sheet becomes separated, it will be associated with the appropriate Form 8362.

Item 1. Amends prior report.—Check Item 1 if this Form 8362 amends a previously filed report. Staple a copy of the original report behind the amended one. Complete Part III in its entirety, but complete only those entries that are being amended.

Part I. Person(s) Involved in Transaction(s)

Note: Section A must be completed in all cases. If an individual conducts a transaction on his/her own behalf, complete only section A. Leave Section B BLANK. If a transaction is

conducted by an individual on behalf of another person(s), complete Section A for such person on whose behalf the transaction is conducted; complete Section B for the individual conducting the transaction.

Section A. Person(s) on Whose Behalf Transaction(s) Is Conducted (Customer)

Item 2. Multiple persons.—Check Item 2 if his transaction is being conducted on behalf of more than one person. For example, if John and Jane Doe cash a check made out to them jointly at the casino, more than one individual has conducted the transaction. Enter information in Section A for one of the individuals; provide information for the other individual on page 2, Section A. Attach additional sheets as necessary.

Items 3, 4, and 6. Individual/Organization name.—If the person on whose behalf the transaction(s) is conducted is an individual, put his/her last name in Item 3, first name in Item 4 and middle initial in Item 5. If there is no middle initial, leave Item 5 BLANK. If the transaction is conducted on behalf of an organization, enter the name in Item 3 and leave Items 4 and 5 BLANK, but identify the individual conducting the transaction in Section B. If an organization has a separate "doing business as (DBA)" name, enter in Item 3 the organization's legal name (e.g., Smith Enterprises, Inc.) followed by the name of the business (e.g., DBA Smith Casino Tours). In this case, use Items 4 and 5 if more space is needed.

Items 6, 8, 9, 10, and 11. Address.—Enter the permanent street address, city, two-letter state abbreviation used by the U.S. Postal Service, and ZIP code of the person identified in Item 3. Also, enter in Item 6 the apartment or suite number and road or route number. Do not enter a P.O. box number unless the person has no street address. If the person is from a foreign country, enter any province name as well as the appropriate two-letter country code (e.g., "CA" for Canada, "JA" for Japan, etc.). If the country is the United States, leave Item 11 BLANK.

Item 7. Social security number (SSN) or Employer identification number (EIN).—Enter the SSN (if an individual) or EIN (if other than an individual) of the person identified in Items 3 through 5. If that individual is a nonresident alien individual who does not have an SSN, enter "NONE" in this space.

Item 12. Date of birth.—Enter the customer's date of birth (DOB) if it is known to the casino through an existing internal record or reflected on an appropriate identification document or credential presented to the casino to verify the customer's identity (see Identification Requirements above). Internal casino records can include those for casino customers granted accounts for credit, deposit, or check cashing, or on whom a CTRC containing verified identity has been filed. If such records do not indicate the DOB, a casino should ask the customer for the DOB. If the DOB is not available from any of these sources, the casino should enter NOT AVAILABLE in the space. Eight numerals must be inserted for each date. Enter the date in the format "mmddyyyy", where "mm" is the month, "dd" is the day, and "yyyy" is the year. Zero (0) should precede any single-digit number. For example, if the

individual's birth date is June 1, 1948, enter "06 01 1948" in Item 12.

Item 13. Method used to verify identity.—If an individual conducts the transaction(s) on his/her own behalf, his/her name and address must be verified by examination of an official credential/document or internal record containing identification information on a known customer (see Identification Requirements above). Check box a if you examined an official identification credential/document. Check box b if you examined an acceptable internal casino record (i.e., credit, deposit, or check cashing account record, or a CTRC worksheet) containing previously verified identification information on a "known customer." Check box c if the transaction is conducted on behalf of an organization. If box a or b is checked, you must complete Item 14. If box c is checked, do not complete Item 14.

Item 14. Describe identification credential.—If a driver's license, passport, or alien registration card was used to verify the individual's identity, check as appropriate box a, b, or c. If you check box d, you must specifically identify the type of document used (e.g., enter "military ID" for a military or military/dependent identification card). A statement such as "known customer" in box d is not sufficient for completion of Form 8362. Enter in Item 14a the two-letter state postal code, two-letter country code, or the name of the issuer for that document, and enter in Item 14f the number shown on that official document.

Item 15. Customer account number.—Enter the account number which corresponds to the transaction being reported and which the casino has assigned to the person whose name is entered in Item 3. If the person has more than one account number affected by the transaction, enter the account number that corresponds to the majority of currency being reported. If the transaction does not involve an account number, enter "NOT APPLICABLE" in the space.

Section B. Individual(s) Conducting Transaction(s) — If Other Than Above (Agent)

Complete Section B if an individual conducts a transaction on behalf of another person(s) listed in Section A. If an individual conducts a transaction on his/her own behalf, leave Section B BLANK.

Item 16. Multiple agents.—If, during a gaming day, more than one individual conducts transactions on behalf of an individual or organization listed in Section A, check this box and complete Section B. List one of the individuals on the front of the form and the other individual(s) on page 2, Section B. Attach additional sheets as necessary.

Items 17, 18, and 19. Name of individual.—Enter the individual's last name in Item 17, first name in Item 18, and middle initial in Item 19. If there is no middle initial, leave Item 19 BLANK. For example, if John Doe, an employee of the Error Free Rock Band, cashes an \$11,000 check for the band, Error Free Rock Band is identified in Section A, and John Doe is identified in Section B.

Items 20, 22, 23, 24, and 25. Address.—Enter the permanent street address, including ZIP code, of the individual conducting the

transaction. If the individual is from a foreign country, enter any province name and the appropriate two-letter country code.

Item 21. Social security number (SSN).—Enter the SSN of the individual identified in Items 17 through 19. If that individual is a nonresident alien who does not have an SSN, enter "NONE" in the space.

Item 22. Date of birth.—Enter the individual's date of birth. For proper format, see the instructions under Item 12 above.

Item 27. Method used to verify identity.—Any individual listed in Items 17 through 19 must present an official document to verify his/her name and address. See the instructions under Item 13 above for more information. After completing Item 27, you must also complete Item 28.

Item 28. Describe identification credential.—Describe the identification credential used to verify the individual's name and address. See the instructions under Item 14 above for more information.

Part II. Amount and Type of Transaction(s)

Part II identifies the type of transaction(s) reported and the amount(s) involved. You must complete all items that apply.

Item 29. Multiple transactions.—Check this box if multiple currency transactions, none of which individually exceeds \$10,000, comprise this report.

Items 30 and 31. Cash in and cash out.—Enter in the appropriate spaces provided in Items 30 and/or 31, the specific currency amount for each "type of transaction" for a reportable Cash In or Cash Out. If the casino engages in a Cash In or a Cash Out transaction that is not listed in Items 30a through 30g or Items 31a through 31l, specify the type of transaction and the amount of currency in Item 30h or 31l, respectively. Enter the total amount of the reportable Cash In transaction(s) in Item 30t. Enter the total amount of the reportable Cash Out transaction(s) in Item 31k.

If less than a full dollar amount is involved, increase the figure to the next higher dollar. For example, if the currency total is \$20,500.25, show it as \$20,501.00.

If there is a currency exchange, list it separately with both the Cash In and Cash Out totals. If foreign currency is exchanged, use the U.S. dollar equivalent on the day of the transaction.

Payments(s) on credit. Item 30c, includes all forms of cash payments made by a customer on a credit account or line of credit, or in redemption of markers or counter checks. Currency received from wire transfer(s) out, Item 30e, applies to cash received from a customer when the casino sends a wire transfer on behalf of a customer.

Currency paid from wire transfer(s) in, Item 31e, applies to cash paid to a customer when the casino receives a wire transfer on behalf of a customer. Travel and complimentary expenses and gaming incentives, Item 31h, includes reimbursements for a customer's travel and entertainment expenses and cash complementaries ("comps").

Determining Whether Transactions Meet The Reporting Threshold

Only cash transactions that, alone or when aggregated, exceed \$10,000 should be reported on Form 8362. A casino must report multiple currency transactions when it has knowledge that such transactions have occurred. This includes knowledge gathered through examination of books, records, logs, information retained on magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information that the casino maintains pursuant to any law or regulation or within the ordinary course of its business.

Cash In and Cash Out transactions for the same customer are to be aggregated separately and must not be offset against one another. If there are both Cash In and Cash Out transactions which each exceed \$10,000, enter the amounts in Items 30 and 31 and report on a single Form 8362.

Example 1. Person A purchases \$11,000 in chips with currency and places a \$10,000 cash bet (two Cash In entries); and later receives currency from a \$8,000 redemption of chips and a \$2,000 slot jackpot win (two Cash Out entries). Complete Form 8362 as follows:

Cash In of "\$11,000" is entered in Item 30a (purchase of chips) and Cash In Total of "\$11,000" is entered in Item 30t. No entry is made for Cash Out. The two Cash Out transactions equal only \$8,000, which does not meet the BSA reporting threshold.

Example 2. Person B deposits \$5,000 in currency to his front money account and pays \$10,000 in currency to pay off an outstanding credit balance (two Cash In entries); receives \$7,000 in currency from a wire transfer (one Cash Out entry); and presents \$2,000 in small denomination U.S. currency to be exchanged for an equal amount in U.S. \$100 bills. Complete Form 8362 as follows:

Cash In of "\$5,000" is entered in Item 30b (deposit), "\$10,000" is entered in Item 30c (payment on credit), "\$2,000" is entered in Item 30g (currency exchange), and Cash In Total of "\$17,000" is entered in Item 30t. In determining whether the transactions are reportable, the currency exchange is aggregated with both the Cash In and the Cash Out amounts. The result is a reportable \$17,000 Cash In transaction. No entry is made for Cash Out. The total Cash Out amount only equals \$9,000, which does not meet the BSA reporting threshold.

Example 3. Person C deposits \$7,000 in currency to his front money account and pays \$9,000 in currency to pay off an outstanding credit balance (two Cash In entries); receives \$2,500 in currency from a withdrawal from a safekeeping account, \$2,500 in currency from a wire transfer and cashes a personal check of \$7,500 (three Cash Out entries); and presents Canadian dollars which are exchanged for \$1,500 in U.S. dollar equivalent. Complete Form 8362 as follows:

Cash In of "\$7,000" is entered in Item 30b (deposit), "\$9,000" is entered in Item 30c (payment on credit), "\$1,500" is entered in Item 30g (currency exchange), and a Cash In total of "\$17,500" is entered in Item 30t. Cash Out of "\$2,500" is entered in Item 31b (withdrawal of deposit), "\$2,500" is entered in Item 31e (wire transfer), "\$7,500" is entered in

Item 31f (negotiable instrument cashed), \$1,500^o is entered in Item 31g (currency exchange) and a Cash Out total of "\$14,000" is entered in Item 31k. In this example, both the Cash In and Cash Out totals exceed \$10,000, and each must be reflected on Form 8362.

Example 4. Person D purchases \$10,000 in chips with currency and places a \$10,000 cash bet (two Cash In entries); and later receives currency for an \$18,000 redemption of chips and \$20,000 from a payment on a cash bet (two Cash Out entries). Complete Form 8362 as follows:

Cash In of "\$10,000" is entered in Items 30a and 30d and a Cash In total of "\$20,000" is entered in Item 30t. Cash Out of "\$18,000" is entered in Item 31a (redemption of chips), "\$20,000" is entered in Item 31d (payment on bets) and a Cash Out Total of "\$38,000" is entered in Item 31k. In this example, both the Cash In and Cash Out totals exceed \$10,000, and each must be reflected on Form 8362.

Item 32. Date of transaction.—Enter the calendar day on which the transaction occurred (see What To File above). For proper format, see the instructions for Item 12 above.

Item 33. Foreign currency.—If foreign currency is involved, identify the country of issuance by entering the appropriate two-letter country code. If multiple foreign currencies are involved, identify the country for which the largest amount in U.S. dollars is exchanged.

Part III. Casino Reporting Transaction(s)

Item 34. Casino's trade name.—Enter the name by which the casino does business and is commonly known. Do not enter a corporate, partnership, or other entity name, unless such name is the one by which the casino is commonly known.

Item 35. Casino's legal name.—Enter the legal name as shown on required tax filings, only if different from the trade name shown in Item 34. This name will be defined as the name indicated on a charter or other document creating the entity, and which is identified with the casino's established EIN.

Item 36. Employer identification number (EIN).—Enter the casino's EIN.

Items 37, 38, 39, and 40. Address.—Enter the street address, city, state, and ZIP code of the casino (or branch) where the transaction occurred. Do not use a P.O. box number.

Items 41 and 42. Title and signature of approving official.—The official who is authorized to review and approve Form 8362 must indicate his/her title and sign the form.

Item 43. Date the form is signed.—The approving official must enter the date the Form 8362 is signed. For proper format, see the instructions for Item 12 above.

Item 44. Preparer's name.—Type or print the full name of the individual preparing Form 8362. The preparer and the approving official may be different individuals.

Items 45 and 46. Contact person/telephone number.—Type or print the name and commercial telephone number of a responsible individual to contact concerning any questions about this Form 8362.

TD F 90-2249

Received September 1997

Suspicious Activity Report by Casinos



File No. 1308-0009

- 1 Check appropriate box(es) (see instructions):
 Initial report Corrected report Supplemental report Form 6302 (GTRC) or Form 6302 (GTRC-H) End

Part I Casino Reporting Information

2 Casino's trade name

3 Casino's legal name

4 Employer identification number

5 Permanent address (numbers, street, and apt. or suite no.)

5 Type of gaming institution

6 City

7 State

8 ZIP code

- State licensed casino
- Tribal casino
- Card club
- Other (specify) _____

Part II Suspect Information (Person Involved in Suspicious Activity)

10 Individual's last name

11 First name

12 Middle initial

13 SSANITIN

14 Permanent address (numbers, street, and apt. or suite no.)

16 Date of birth

M D Y Y Y Y

18 City

17 State

18 ZIP code

19 Country (if not U.S.)

20 Organization's name (if applicable)

21 EIN

22 Describe identification credentials:

- Driver's license/state ID
- Passport
- Alias registration
- Other _____

• Number: _____

Issuing authority

23 Residence phone number - (include area code)

24 Work phone number - (include area code)

25 Account number, if any

26 Occupation/type of business

27 Relationship to casinos:

- Customer Joint/Tour operator Check cashing operator Other (specify) _____
- Agent Employee Supplier

28 Does casino still have a business association and/or an employee/employer relationship with suspect?

• Yes No, if so, specify below• Barred Resigned Terminated Other (specify) _____

29 Date Barred, resigned or terminated

M D Y Y Y Y

NOTICE: This form is required to be used by Nevada casino licensees in satisfying the new suspicious activity reporting requirements contained in Nevada Gaming Commission Regulation 6A, Section 10B. The U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) intends to issue a notice of proposed rulemaking, sometime in 1997, that would require casinos and card clubs subject to the requirements of the Bank Secrecy Act and its implementing regulations (31 CFR Part 103) to report suspicious activity. Until such a rule is published as a final rule in the Federal Register and takes effect, casinos and card clubs in jurisdictions other than Nevada are encouraged, but not yet required to file this form to report suspicious activity. Reports filed by Nevada casinos and any reports filed voluntarily by other casinos and card clubs will be fully subject to the protection from liability contained in 31 U.S.C. 5316(e)(3) and to the

Part III Suspicious Activity Information

10 Date of suspicious activity

M 4 3 0 7 Y Y Y

11 Dealer amounts involved in suspicious activity

M 4 3 0 7 Y Y Y

12 Type of suspicious activity (check no more than 4 boxes)

- 13 Robbery 14 Large transactions w/ minimal gaming 15 Use of different monetary instruments
 16 Counterfeit/fraudulent checks 17 Minus of position 18 Use of multiple credit or deposit accounts
 19 Counterfeit/fraudulent credit/debit card 20 Money laundering 21 Unusual use of wire transfers
 22 Embezzlement/Theft 23 No apparent business or lawful purpose 24 Other suspicious or illegal activity (specify) _____
 25 Large U.S. currency exchanges 26 Counterfeiting

Part IV Law Enforcement Agency Information

13 Has a law enforcement agency been contacted (excluding submission of a SAR to FINCEN at OCC or a copy to a gaming regulatory?)

 Yes, if so, specify below No 14 FBI 15 USCG 16 USSS 17 Other Federal 18 State Gaming 19 Other State 20 Local 21 Tribal 22 Agency name (e.g., N.I.C. or I.G.) _____

19 Agency address (number, street, and apt. or suite no.)

23 Date contacted

M 4 3 0 7 Y Y Y

24 City

27 State

28 ZIP code

29 Phone number (include area code)

() - - - -

30 Last name of person contacted

31 First name

42 Middle initial

43 Title

Part V Witness Information (if applicable)

44 Last name

45 First name

46 Middle initial / Title/Occupation

47 Permanent address (number, street, and apt. or suite no.)

48 City of birth

M 4 3 0 7 Y Y Y

49 City

51 State

52 ZIP code

53 Country (if not U.S.)

54 Residence phone number - (include area code)

55 Work phone number - (include area code)

56 Was witness interviewed by casino or
a law enforcement agency? Yes No

Part VI Preparer Information

57 Last name

58 First name

59 Middle initial

60 Title

61 Work phone number (include area code)

62 Date prepared

M 4 3 0 7 Y Y Y

Part VII Contact for Assistance (if different from Preparer in Part VI)

63 Last name

64 First name

65 Middle initial

66 Title

67 Work phone number (include area code)

() - - - -

68 Organization name (if applicable and other than casino in Item 2)

Part VIII Suspicious Activity Information - Narrative Explanation/Description

3

Suspicion/Description of Known or Suspected Violation of Law(s) or Suspicious Activity. Provide a clear and concise account of the possible violation of law(s). Describe in detail what is unusual, irregular or suspicious about the activity. Use the checklist below as you answer your account. This section of the report is critical. The care with which it is written may make the difference in whether or not the concerned jurisdiction conduct another full possible criminal review and charge indictment.

- a. Provide a brief chronological summary of the suspicious activity.
- b. Indicate where the possible violation of law(s) took place (e.g., branch, cage, specific gaming pit, specific gaming area, etc.).
- c. Explain who benefited, financially or otherwise, from the transaction(s), how much and how and whether compensated or only attempted.
- d. Describe suspect's position if a casino employee (e.g., dealer, pit supervisor, cage cashier, host, director of marketing, etc.).
- e. Indicate whether funds or assets were recovered and, if so, show the dollar value of the recovery in whole dollars only.
- f. Indicate whether the possible violation of law(s) is an isolated incident or relates to another transaction(s).
- g. Indicate whether there is any other related allegation if yes, specify its status.
- h. Describe supporting documentation, including any video or audio tapes and credit bureau report which relate to the activity.
- i. Describe any additional information which is necessary to fully understand the unusual, irregular or suspicious nature of the activity.
- j. Recommend any further investigation that might assist law enforcement authorities.

For Money Laundering, Structuring, or Wire Transfer referrals, please include the following additional information:

- k. Indicate whether U.S. or foreign currency and/or monetary instrument(s) were involved. If so, provide the amount and/or description.
- l. Indicate any additional casino account number(s), and any domestic or foreign bank(s)支票账户 number(s) which may be involved.
- m. Indicate for a foreign national any available information on U.S. or foreign visas including country and/or city of issuance, or temporary U.S. address.

Retain for a Period of Five Years

- a. All supporting documentation, including any video or audio tapes and credit bureau report which relates to the suspicious activity.
- b. Any confession, admission, or explanation of the transaction(s) provided by the suspect(s) and indicate to whom and when it was given.
- c. Any confession, admission, explanation or interview concerning the transaction(s) provided by any other person(s) and indicate to whom and when it was given.
- d. Any evidence of cover-up or evidence of an attempt to deceive federal or state gaming regulators or others.
- e. All supporting documentation must be made available, upon request, to appropriate law enforcement authorities and regulatory agencies.

Enter explanation/description in the space below. If needed, continue the narrative on the next page. Do not submit supporting documentation when filing this form.

Part VIII - Continued Suspicious Activity Information - Narrative Explanation/Description 3

Continue writing explanation/description in the space below. If more space is needed, continue the narrative on a single duplicate of this page.

On 10/10/2010 at approximately 10:00 AM, I was driving my vehicle on the highway when I saw a white minivan driving erratically. The driver was weaving in and out of traffic, and the passengers were shouting and laughing. I followed the minivan for about 10 miles before pulling over to the side of the road. When I approached the vehicle, I noticed that the windows were tinted black and there was no license plate. I asked the driver for identification, but he refused to show it to me. I then called the police, who arrived shortly after. The police officer asked me to describe the vehicle and the behavior of the occupants. I provided the information, and the police officer took the minivan into custody. The driver was later arrested for driving under the influence and possession of an unregistered vehicle.

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Suspicious Activity Report by Casinos Instructions

Safe Harbor Federal law (31 U.S.C. 5318(g)(3)) provides complete protection from civil liability for all reports of suspicious transactions made to appropriate authorities, including suspending documentation, regardless of whether such reports are filed pursuant to this report's instructions or are filed on a voluntary basis. Specifically, the law provides that a financial institution, and its directors, officers, employees and agents, that make a disclosure of any possible violation of law or regulation, including in connection with the preparation of suspicious activity reports, "shall not be liable to any person under any law or regulation of the United States or any constituent law, or regulation of any State or political subdivision thereof, for such disclosure or for any failure to notify the person involved in the transaction or any other person of such disclosure".

Notification Prohibited Federal law (31 U.S.C. 5318(g)(2)) requires that a financial institution (a term which includes a casino or card club) and its directors, officers, employees, and agents, who report suspicious transactions to the government may not notify any person involved in the transaction that the transaction has been reported.

If the suspicious or suspected illegal activity requires immediate attention (e.g., when a transaction required to be reported is ongoing) the casino shall immediately notify, by telephone, an appropriate law enforcement authority. In addition, a timely suspicious activity report shall be filed. When appropriate, the casino may also notify a state, local or tribal casino gaming regulatory agency.

When To Make A Report:

1. Nevada Casinos.

- a. All casinos subject to Nevada Gaming Commission Regulation 6A are required, pursuant to Nevada regulatory requirements, to make this report following the discovery of a suspicious transaction.
- b. A casino subject to Nevada Regulation 6A must file this report no later than 30 calendar days after the date of initial detection of facts that may constitute a basis for filing the report. If no suspect was identified on the date of detection of the transaction requiring the filing, a casino may delay filing a suspicious activity report for an additional 30 calendar days to identify a suspect. In no case shall reporting be delayed more than 60 calendar days after the date of initial detection of a transaction that is required to be reported.

2. Casinos or club clubs in jurisdictions other than Nevada.

- a. FINCEN intends to issue a notice of proposed rulemaking, sometime in 1997, that would require casinos and card clubs subject to the requirements of the Bank Secrecy Act and its implementing regulations (31 CFR Part 103) to report suspicious activity. Until such a rule is published as a final rule in the Federal Register and takes effect, casinos and card clubs in jurisdictions other than Nevada are encouraged, but not yet required to file this form to report suspicious activity. Any such voluntary report will be fully subject to the protection from liability contained in 31 U.S.C. 5318(g)(3) and to the limitation on notification of customer contained in 31 U.S.C. 5318(g)(2).

- b. Illustrative of the type of activity that casinos and card clubs should voluntarily report are those following the discovery of:

Any transaction (which includes a deposit, withdrawal, transfer between accounts, exchange of currency, loan, extension of credit, purchase or sale of any casino chips, tokens or other gaming instruments, or other monetary instrument or investment security, or any other payment, transfer, or delivery by, through, or to a casino of any stock, bond, or certificate of deposit, by whatever means effected) conducted or attempted by, at or through the casino and involving funds or other assets, if the casino knows, suspects, or has reason to suspect that:

- (1) The transaction involves funds derived from illegal activities or is intended or conducted in order to hide or disguise funds or assets derived from illegal activities (including, without limitation, the nature, source, location, ownership or control of such funds or assets) as part of a plan to violate or evade or to avoid any

- (2) The transaction is designed to evade any regulations promulgated under the Bank Secrecy Act; or
- (1) The transaction has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the casino knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose for the transaction.

1. All Casinos:

- a. The suspicious activity report does not need to be filed for those robberies and burglaries that are reported to local authorities.
- b. The Bank Secrecy Act regulations require that all casinos, except those in Nevada, report currency transactions in excess of \$10,000 on IRS Form 8302 to the Department of the Treasury. Nevada Gaming Commission Regulation 6A requires that Nevada casinos report currency transactions in excess of \$10,000 on IRS Form 8302 to the Department of the Treasury. For a Nevada casino, if a currency transaction exceeds \$10,000 and is suspicious, it must file both Form 8302 (reporting the currency transaction) and a suspicious activity report (reporting the suspicious aspects of the transaction). For a casino in a jurisdiction other than Nevada, it must file Form 8302 (reporting the currency transaction) and should voluntarily file a suspicious activity report (reporting the suspicious aspects of the transaction). If the suspicious activity involves a currency transaction that is \$10,000 or less, a Nevada casino is only required to file a suspicious activity report.

Where and How To Make A Report:

1. Send each completed Suspicious Activity Report by Casinos (SARC) to:

FinCEN
Detroit Computing Center (DCC)
ATTN: SARCS
P.O. Box 32821
Detroit, MI 48232-5980

2. Complete each suspicious activity report (including a corrected or supplemental report) in its entirety using all available information. Leave blank any items that do not apply or for which information is unavailable.

3. Do not submit supporting documentation when filing the suspicious activity report. Instead, retain a copy of the SARC and all original supporting documentation or business record equivalent (including any video or audio tapes) for 5 years from the date of filing the suspicious activity report. All supporting documentation must be made available to appropriate authorities upon request.

4. A report must be typed or legibly handwritten.

5. A casino may also file a copy of a suspicious activity report with its state, local or tribal gaming regulator.

6. In situations that require immediate attention (i.e., where a delay would hinder the government's ability to take action), a casino shall notify an appropriate law enforcement authority in addition to filing a SARC.

7. FinCEN is preparing "Guidance for Detecting and Reporting Suspicious Casino Transactions and Activities" which will contain a representative list of examples of suspicious casino transactions and activities. The examples will explain some of the ways a casino's financial services can be used to commit fraud, launder funds or commit other financial crimes regardless of where this activity may occur in a casino. After the guidance is issued in final, casinos will be able to obtain copies of it from FinCEN or the Internal Revenue Service's BSA Bulletin Board at (313) 234-1453, or at FinCEN's Internet Homepage (<http://www.treas.gov/treasury/bureaus/fincen>). Casinos subject to Nevada Gaming Commission Regulation 6A should refer to any suspicious activity guidance provided by the Nevada Gaming Control Board. Casinos located in other jurisdictions also are encouraged to consult with the appropriate state, local, or tribal gaming regulatory agency to determine if any additional guidance has been issued on this subject.

Specific Document Preparation Instructions

Item 1. Type of report.—Check box a, Initial Report, if this is the first report of the described suspicious activity. Check box b, Corrected Report, if this report is filed to correct a previously filed SAR. Check box c, Supplemental Report, if this report is filed to provide additional information to a previously filed SAR. Check box d, CTRC or CTRC-N Filed, if both a Currency Transaction Report by Casinos (i.e., Form 8302 or Form 8352) and a suspicious activity report by casinos (reporting the suspicious aspects of the transaction) were filed.

Part I. Casino Reporting Information

Item 2. Casino's trade name.—Enter the name by which the casino does business and is commonly known. Do not enter a corporate, partnership, or other entity name unless such name is the one by which the casino is commonly known.

Item 3. Casino's legal name.—Enter the legal name as shown on required tax filings, only if different from the trade name shown in Item 2. The legal name should match the name shown on the charter or other document creating the entity, and which is identified with the casino's established tax identification number.

Item 4. Employer identification number.—Enter the institution's nine-digit employer identification number.

Items 5, 6, 7 and 8. Permanent address.—Enter the street address, city, two-letter state abbreviation used by the U.S. Postal Service and ZIP code of the casino (or branch office) where the activity occurred. A Post Office (P.O.) box number should be used only if there is no other street address.

Item 9. Type of gaming institution.—Check the appropriate box for the type of gaming institution. Check box a if you are a land-based or riverboat casino that is duly licensed by a State, Territory or Insular Possession of the United States. Check box b if you are a tribal casino (i.e., a Class III gaming operation). Check boxes a and b if you are a tribal casino duly licensed by a state gaming regulatory agency. Box c is provided for a card club, gaming club, card room or gaming room (including one operating on Indian lands) that files a report of a suspicious transaction or activity. If you check the Other box, be sure to specify the type of gaming institution.

Part II. Suspect Information (Person Involved in Suspicious Activity)

Items 10, 11 and 12. Individual's name.—Enter the last name of the individual involved in the suspicious activity in Item 10, first name in Item 11 and middle initial in Item 12. If there is no middle initial, leave Item 12 BLANK. If the casino determines that the suspect has an "alias" or "A.K.A.", enter the individual's full legal name in Items 10, 11 and 12 and the alias name(s) used in Part VIII. If there is more than one individual (e.g., multiple customers or a customer and an agent), make as many copies of page 1 of the form as are necessary and provide the additional information in Part II. Also, complete items 2, 3 and 4 and write the date of the suspicious activity across the top of page 1.

Item 13. SSN/TIN.—If the individual whose name you entered in Items 10 through 12 is a U.S. citizen or an alien with a social security number, enter his or her social security number (SSN) in Item 13. If that individual is an alien with an RS Individual Tax Identification Number (ITIN), enter that number in Item 13.

Items 14, 16, 17, 18, and 19. Permanent address.—Enter the permanent street address, city, two-letter state abbreviation, and ZIP code of the individual whose name you entered in Items 10 through 12. Also, enter in Item 14 any apartment number or suite number and road or route number. Do not enter a P.O. box number in Item 14 unless the individual has no street address. If the individual is from a foreign country, enter any province name as well as the appropriate two-letter country code in Item 19. If the country is the United States, leave Item 19 BLANK.

Item 15. Date of birth.—Enter the date of birth of the individual named in Items 10 through 12. Eight numerals must be entered for each date. Enter the date in the format "mmddyyyy", where "mm" is the month, "dd" is the day, and "yyyy" is the year. Zero(0) should precede any single-digit number. For example, if the individual's birth date is June 1, 1948, enter "06 01 1948" in Item 15. If the month and/or day is not available or is unknown, enter zeros in the space for "mm" or "dd" (e.g., "01 00 1969" indicates an unknown day in January, 1969).

Item 20. Organization's name.—If the individual named in Items 10 through 12 is acting as an agent for an organization which is conducting business with the casino, enter the organization's name in Item 20 and the organization's address in Part VIII. If an organization has a separate "doing business as" (DBA) name, enter the organization's legal name (e.g., Smith Enterprises, Inc.) followed by the name of the business (e.g., DBA Smith Casino Tours) in Part VIII.

Item 21. EIN.—If you entered an organization name in Item 20, enter the employer identification number in Item 21.

Item 22. Describe identification credential.—If the individual's identity was verified, check the appropriate box in "a," "b," "c" or "d" showing the type of any document used. If you check the Other box, specify the type of document used (e.g., enter "Military ID" for a military or military/dependent identification card). If a driver's license, passport, alien registration card, etc. was used to verify the individual's identity, enter in Item 22a the number of the document and enter in Item 22b the two-letter state postal code (e.g., IL for Illinois, NJ for New Jersey, etc.) or two-letter country code (e.g., CA for Canada, JA for Japan, etc.) or the name of the issuer for that document.

Item 23. Residence phone number.—Enter the home telephone number including area code of the individual listed in Items 10 through 12.

Item 24. Work phone number.—Enter the work telephone number including area code of the individual or organization listed in Items 10 through 12.

Item 25. Account number, if any.—Enter the customer's account number of any account that was affected by the suspicious activity. If two or more accounts are affected, provide the additional information in Part VIII. If the activity does not involve an account, enter "NOT APPLICABLE" in the space.

Item 26. Occupation/type of business.—Identify the occupation, profession or business that most specifically describes the individual or organization shown in Items 10 through 12 or 20 (e.g., accountant, attorney, car dealer, carpenter, check cashing operator, dentist, doctor, farmer, junket or tour operator, real estate agent, truck driver, etc.). Do not use nondescriptive terms such as businessman, construction worker, merchant, self-employed, store owner, etc. If the individual's business activities can be described more fully than just by occupation, provide additional information in Part VIII. Enter "UNKNOWN" in Item 26, if you do not know the individual's occupation or profession.

Item 27. Relationship to casino.—Check the box or boxes that best describe the suspect's relationship with the casino. More than one box may be checked. If you check the Other box, be sure to specify briefly (in two or three words) the relationship. If the suspect is or was an employee of the casino, check box d and specify in Part VIII the suspect's position (e.g., dealer, pit supervisor, cage cashier, host, director of marketing, officer, etc.) and his/her involvement in the suspicious activity.

Item 21. Does casino still have a business association and/or an employee/employer relationship with the suspect?—If you check box b for "No", indicate what action occurred that ended the relationship with the person in boxes c, d, e or f. Indicate whether the person has been barred (i.e., the person was precluded from engaging in any further gaming transaction), resigned (i.e., the person voluntarily left the employment of the casino or otherwise severed all ties), terminated (i.e., the person was discharged from employment or contractual obligation) or otherwise ended the relationship in some different way. If you check the Other box, specify briefly (in two to five words) how the relationship ended (e.g., denial of credit, denial of other financial services; etc.).

Item 22. Date barred, resigned or terminated.—Enter the date the individual was barred, resigned or terminated. Eight numerals must be entered for each date. Enter the date in the format "mmddyyyy", where "mm" is the month, "dd" is the day, and "yyyy" is the year. Zero(0) should precede any single-digit number.

Part III - Suspicious Activity Information

Item 23. Date of suspicious activity.—Enter only one date in this item. Refer to instructions for Item 29 for proper date format. This must be the date the initial suspicious activity occurred. For multiple or related occurrences, show any additional dates in Part VIII. If the same individual or organization commits multiple or related activities within 30 calendar days after the date of initial detection, the casino may report the activity on one SARC, but only if doing so will fully describe what has occurred. A supplemental report must be filed for other related activity committed after the initial 30 day detection period.

Item 31. Dollar amount involved in suspicious activity.—Enter the total dollar value of the funds or assets involved in the suspicious activity committed by the same individual or organization within 30 calendar days after the date of initial detection. The total dollar value entered must be in the form of numerals. For multiple or related activity, show the breakdown of the aggregated total in Part VIII. Use whole dollars only. If less than a full dollar amount is involved, increase that figure to the next highest dollar. If the dollar amount cannot be determined or estimated then the value of this item can be zero (0).

Item 32. Type of suspicious activity.—Check the box or boxes which best identify the suspicious activity, up to a limit of four. If you check the Other box, specify briefly (in two or three words) the type of suspicious or suspected illegal activity which occurred, but is not already listed in Item 32. For guidance on what may be suspicious activity, see Item 7 in "Where and How to Make a Report" on page 6.

Part IV. Law Enforcement Agency Information

Item 33. Has a law enforcement agency been contacted?—Check box a if you have advised any law enforcement agency of the suspicious activities by telephone or written communication (excluding submission of a SARC to INCEN at OCC or a copy to a gaming regulator). If you check box a, complete either box "c, d, e, f, g, h, l, j or k" as well as Items 34 through 43. Box a, "USCS" stands for the U.S. Customs Service. Box l, "USSS" stands for the U.S. Secret Service. If you checked boxes "g, h, l, j or k" for other federal, state, gaming, other state, local or tribal agencies, specify the agency name in box l. If you checked boxes "c, d, e, or f", there is no need to complete box l. If you have not contacted any law enforcement agency, check box b to indicate "No" and go to Item 44.

Items 34, 35, 36, 37, 38, 39, 40, 41, 42 and 43. Contacting law enforcement.—If you checked Item 33a to indicate "Yes", list the agency's address, date contacted, telephone number and person contacted in Items 34 through 43. If more than one law enforcement agency has been contacted, specify the other agency's name, address and person contacted in Part VIII. Refer to instructions for Item 6 for proper address format and Item 29 for proper date format.

Part V. Witness Information (If applicable)

Item 44, 45, and 46. Witness's name.—If there was a witness to the suspicious activity, enter that person's name in Items 44 through 46. This witness may or may not be an employee of the casino. If there is more than one witness (i.e., a group of witnesses or several addresses), make as many copies of page 2 of the form as are necessary and provide the additional information in Part V. Also, complete Item 30 and write the casino's legal name, casino's trade name and EIN across the top of page 2.

Item 47. Title/Occupation.—If the witness is a casino employee, enter the witness's job title. If not, enter the witness's occupation or business.

Items 48, 50, 51, 52 and 53. Permanent address.—Enter the witness's permanent street address, city, two-letter state abbreviation, and ZIP code. Also, enter in Item 48 any apartment number or suite number and road or route number. Do not enter a P.O. box number in Item 48 unless the witness has no street address. If the individual is from a foreign country, enter in Item 53 any province name and the appropriate two-letter country code. If the country is the United States, leave Item 53 BLANK.

Item 49. Date of birth.—Enter the witness's date of birth. Refer to the instructions for Item 15 for proper date format.

Item 54. Residence phone number.—Enter the witness's residence telephone number including area code.

Item 55. Work phone number.—Enter the witness's work telephone number including area code.

Item 56. Was witness interviewed by casino or a law enforcement agency?—Check box a if the witness was interviewed by personnel of the casino or a law enforcement agency. Enter the name of the individual who interviewed the witness, the interviewer's organization name, and summarize the substantive information from the interview in Part VII. If no witness was interviewed, check box b.

Part VI. Preparer Information

Items 57, 58, and 59. Preparer's name.—Enter the person's name who prepared this SARC.

Item 60. Title.—Enter the preparer's job title.

Item 61. Work phone number.—Enter the preparer's work telephone number including area code.

Item 62. Date prepared.—Enter the date prepared. Refer to the instructions for Item 29 for proper date format.

Part VII. Contact for Assistance (If different from Preparer in Part VI)

Note: Complete Part VII only if assistance will be provided by someone other than the preparer.

Items 63, 64, and 65. Contact's name.—Enter the name of the contact.

Item 66. Title.—Enter the contact person's job title.

Item 67. Work phone number.—Enter the contact person's work telephone number including area code.

Item 68. Organization name.—If the contact person is employed by an organization other than the reporting casino in Item 2, enter the name of the organization.

Part VIII. Suspicious Activity Information

MULTIPLE TRANSACTION LOG

Name _____

List _____ First _____ MI _____

Permanent Address _____

Street _____ City _____ State _____ Zip Code _____

Social Security Number _____ Picture ID _____

Physical Description _____ Type _____ Number _____

It. _____ Wt. _____ Eye _____ Hair _____ M/F _____ Approx. Age _____

Department _____ Transaction Type _____

BJ - Slots - Cage - Bingo - Booth Buy-in / Cash Out

TRANSACTION AMOUNT **TIME** **EMPLOYEE INITIALS**

AM/PM

Received By: _____ Date: _____

Reviewed By: _____ Date: _____

**BLOT DEPARTMENT
ACTIVITY REPORT MULTIPLE TRAVERSALS**

לאליך דער

Description of Flowers

Rules:	A Asian	BLK-Blac
	B Black	BRN-Brown
	c Caucasian	BLD-blond
	H Hispanic	GR-gray
	N Native	RED-red
	Z Other (specify)	

۱	۲۱-۵۰	۷	۲۵-۸۱
۲	۳۱-۴۵	۸	۶۱-۸۵
۳	۳۶-۴۰	۹	۶۴-۷۸
۴	۴۱-۴۵		
۵	۴۹-۵۰		
۶	۵۱-۵۵		

B<small>UILD</small>	H<small>EAVY</small>	M<small>EDIUM</small>	T<small>HIN</small>	H<small>EIGHT</small>	L<small>ARGE</small>	S<small>MALL</small>
Build	Heavy	Medium	Thin	Height	Large	Small
Build	Heavy	Medium	Thin	Land	1st Small	1st Small
Build	Heavy	Medium	Thin	Size	2nd Small	2nd Small
Build	Heavy	Medium	Thin	Size	3rd Small	3rd Small
Build	Heavy	Medium	Thin	Size	6' & over	6' & over

رداً ساده YES / NO
رداً متعذر YES / NO
نعم YES / NO

Title 31 Exception Report

Page 29

Date: _____

Department: _____

Employee: _____

This exception report has been issued for the following reason/reasons:

Currency Transaction Report

Not Complete

Returned

Other

Multiple Transaction Log

Not on file

Other

Suspicious Activity Report

Returned

Other

Correction:

Department Manager Signature: _____

Date: _____

Were proper corrections made?

Yes

DATE: _____

No

All copies must remain attached to the exception report. The exception report must be returned to Casino Administration Office, as soon as possible.