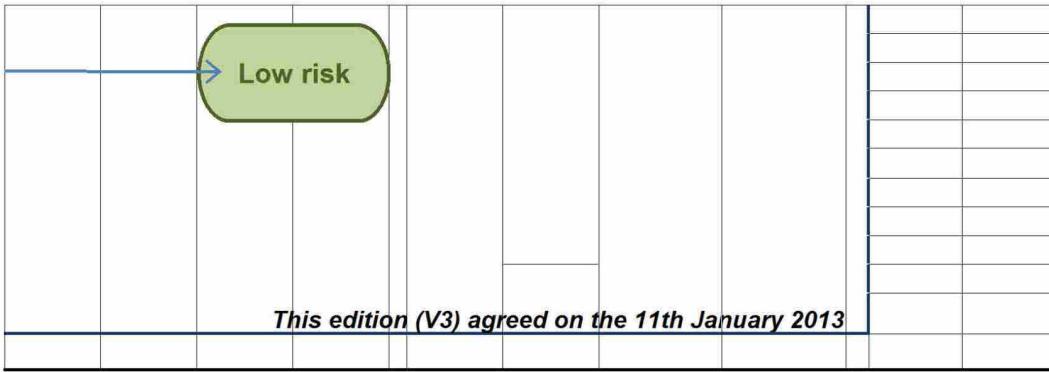
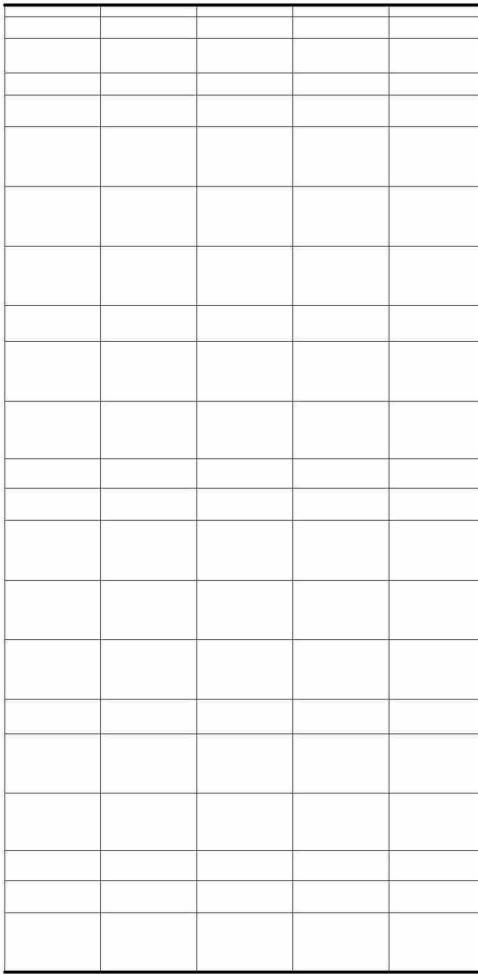


			5d Unusually high frequency of play	OR	5e Repetitive buy ins after significant losses	OR	5f Pattern of attending multiple gaming facilities	No



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

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



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

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

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

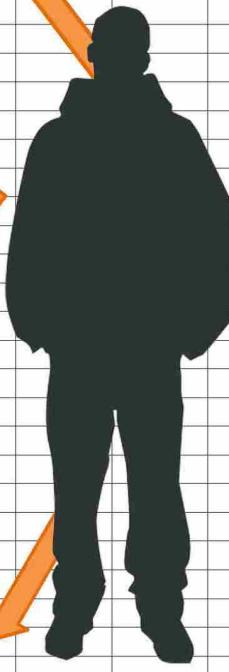
- Has known associates who are deemed suspicious by the gaming facilities

ISSUES RELATING TO PLAY

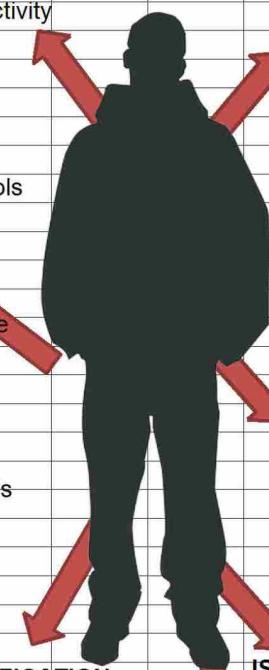
- Has unusual play for the individual (e.g., sudden increase in frequency or amount of money played)
- Has unusual play for the location (e.g., higher than average buy-in for that gaming location)
- Has a large volume of verified win cheques on tables or slots
- Has a pattern of attending multiple gaming

ISSUES RELATING TO FUNDS

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

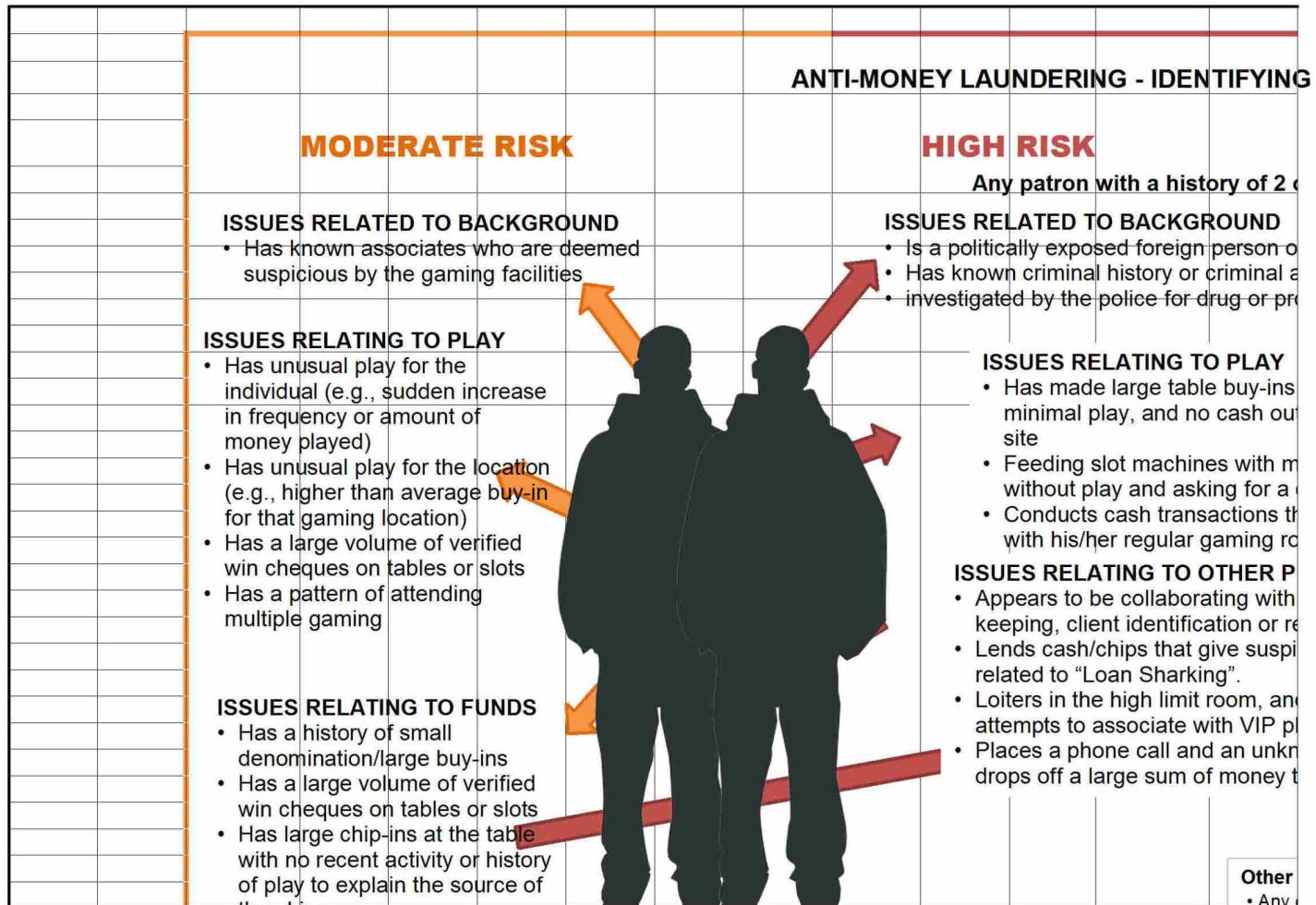


IDENTIFYING INDIVIDUALS WHO MIGHT BE HIGH RISK FOR MONEY LAUNDERING						
ISSUES RELATED TO BACKGROUND						
<ul style="list-style-type: none"> • Is a politically exposed foreign person or a family member of a politically exposed foreign person • Has known criminal history or criminal associates; is being investigated by the police for drug or proceeds of crime or is suspected of being involved in illegal activity 						
ISSUES RELATING TO CONVERSATIONS						
<ul style="list-style-type: none"> • Shows uncommon curiosity about internal systems, controls and policies • Makes inquiries that would indicate a desire to avoid reporting • Has unusual knowledge of the law in relation to suspicious transaction reporting • Seems very conversant with money laundering or terrorist activity financing issues • Is quick to volunteer that funds are "clean" or "not being laundered" 						
ISSUES RELATING TO IDENTIFICATION						
<ul style="list-style-type: none"> • Refuses to show ID or shows only invalid/ 						
ISSUES RELATING TO PLAY						
<ul style="list-style-type: none"> • Has made large table buy-ins with small bills, with minimal play, and no cash out before leaving the site • Feeding slot machines with money, cashing out without play and asking for a cheque or large bills. • Conducts cash transactions that are not in keeping with his/her regular gaming routine. 						
ISSUES RELATING TO FUNDS						
<ul style="list-style-type: none"> • Requests to exchange small denomination bank notes for large denomination bank notes at cage • Attempts at converting cash into a verified win cheque • Conducts cash transactions that are not in keeping with his/her regular gaming routine. 						
ISSUES RELATING TO OTHER PEOPLE						



		avoid the 24-hour rule									
		• Starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the client in the past									
		• Has access to large amounts of cash after banking hours on short notice									
		• Has a history of small denomination/large buy-ins									
		• Has unusual play for the individual (e.g., sudden increase in frequency or amount of money played)									
		• Has unusual play for the location (e.g., higher than average buy-in for that gaming location)									
		•									
		• Has a large volume of verified win cheques on tables or slots									
		• Has a pattern of attending multiple gaming									
		• Has large chip-ins at the table with no recent activity or history of play to explain the source of the chips									
		• Has unusual transaction history/activity with a PGF									
		• Performs two or more cash transactions of less than \$10,000 each just outside of 24 hours apart, seemingly to avoid detection									
		• Starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the client in the past									
		• Has access to large amounts of cash after banking hours on short notice									

<ul style="list-style-type: none">• Provides doubtful or vague information• Occupation does not match the level or type of play with no known explanation for the difference• Attempts to avoid being identified under the FINTRAC large cash transaction policy.• Appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds		<ul style="list-style-type: none">• Lends cash/chips that give suspicion to believe it is related to "Loan Sharking".• Loiters in the high limit room, and associates with or attempts to associate with VIP players.• Places a phone call and an unknown vehicle/patron drops off a large sum of money to the patron.
<p style="text-align: center;">OR: Has a history of 2 or more suspicious transactions</p>		
<p>id the 24-hour rule t in the past</p>		



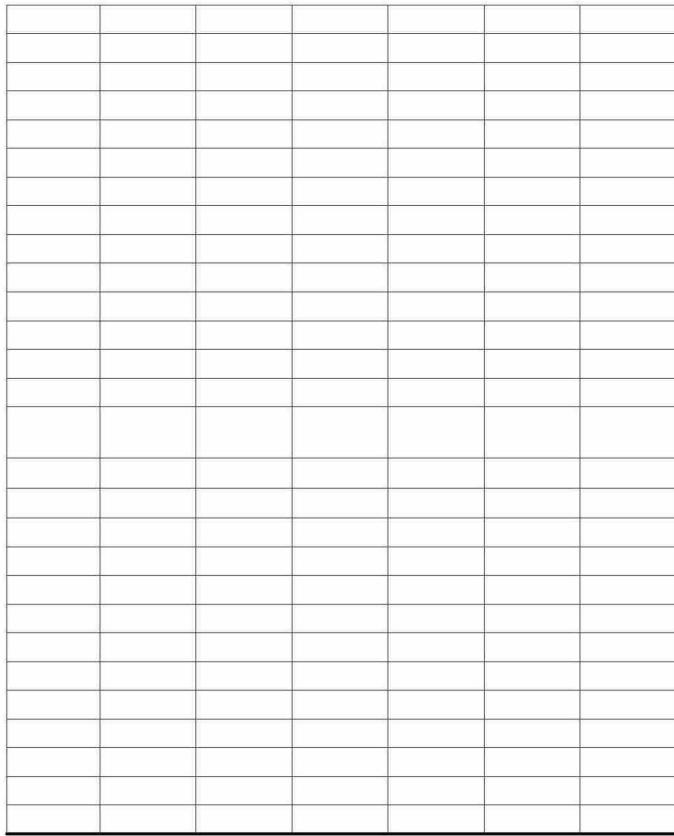
ATRONS - WHAT TO LOOK OUT FOR						
or more suspicious transactions is considered high risk						
for a family member of a politically exposed foreign person associates; is being proceeds of crime or is suspected of being involved in illegal activity						
with small bills, with t before leaving the oney, cashing out cheque or large bills. at are not in keeping utine.						
EOPLE others to avoid record reporting thresholds cion to believe it is d associates with or layers. own vehicle/patron o the patron.						
ISSUES RELATING TO CONVERSATIONS						
<ul style="list-style-type: none"> • Shows uncommon curiosity about internal systems, controls and policies • Makes inquiries that would indicate a desire to avoid reporting • Has unusual knowledge of the law in relation to suspicious transaction reporting • Seems very conversant with money laundering or terrorist activity financing issues • Is quick to volunteer that funds are “clean” or “not being laundered” 						
ISSUES RELATING TO FUNDS						
<ul style="list-style-type: none"> • Requests to exchange small denomination bank notes for large denomination bank notes at cage • Attempts at converting cash into a verified win cheque • Conducts cash transactions that are not in keeping with his/her regular gaming routine. 						
factors that FINTRAC advises should be considered as high risk flags						
casino transaction of \$3,000 or more when an individual receives payment in casino cheques made out to						

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	<p>transactions or less than \$10,000 each just outside of 24 hours apart, seemingly to avoid the 24-hour rule</p> <ul style="list-style-type: none"> Starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the client in the past Has access to large amounts of cash after banking hours on short notice 	<ul style="list-style-type: none"> Refuses to show ID or shows only invalid/ expired ID Produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate Provides doubtful or vague information Occupation does not match the level or type of play with no known explanation for the difference Attempts to avoid being identified under the FINTRAC large cash transaction policy. Appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds 	
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- : attempts to avoid the filing of a report for cash by breaking up the transaction.
- : requests cheques that are not for gaming winnings.
- : enquires about opening an account with the casino and the ability to transfer the funds to other locations
- : you do not know the client as a regular, frequent or large volume player.
- : purchases large volume of chips with cash, participates in limited gambling activity with the intention of
- : g a perception of significant gambling, and then attempts to cash in the chips for a casino cheque.
- : puts money into slot machines and claims accumulated credits as a jackpot win.
- : exchanges small denomination bank notes for large denomination bank notes, chip purchase vouchers
- : que.
- : is known to use multiple names.
- : requests the transfer of winnings to the bank account of a third party or a known drug source country or
- : untry where there is no effective anti-money-laundering system.
- : action seems to be inconsistent with the client's apparent financial standing or usual pattern of activities.
- : action appears to be out of the normal course for industry practice or does not appear to be economically
- : for the client.



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

HIGH RISK

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

● ISSUES RELATING TO PLAY

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

● ISSUES RELATING TO FUNDS

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

● ISSUES RELATING TO OTHER PEOPLE

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

● ISSUES RELATED TO BACKGROUND

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

4 RISK PATRONS - WHAT TO LOOK OUT FOR

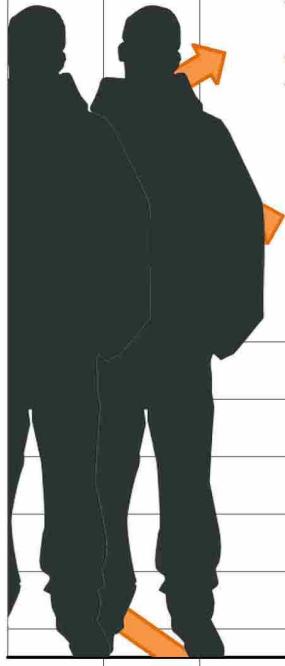
Moderate Risk

● ISSUES RELATING TO PLAY

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

● ISSUES RELATING TO FUNDS

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



		● ISSUES RELATING TO IDENTIFICATION <ul style="list-style-type: none">• Refuses to show ID or shows only invalid/ expired ID• Produces seemingly false identification or identification that appears to be counterfeited, altered or inaccurate• Provides doubtful or vague information• Occupation does not match the level or type of play with no known explanation for the difference• Attempts to avoid being identified under the FINTRAC large cash transaction policy.• Appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds	Other factors <ul style="list-style-type: none">• Client requests• Client attempts• Client requests• Client purchases creating a perceived risk• Client puts money in the account• Client exchanges cheques.• Client is known to the institution• Transaction seems suspicious• Transaction appears to be structured for the client

