

# ANTI-MONEY LAUNDERING (AML) PROGRAM

## WHAT YOU NEED TO KNOW

Created by the Ontario Lottery and  
Gaming Corporation in collaboration with  
Great Blue Heron Casino, Caesars Windsor,  
Casino Rama and Niagara Casinos.



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1-888-220-FLIP (3547)

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## Suspicious Transaction Reports (STR)

A STR must be completed if you have reasonable grounds to suspect that a patron's behaviour or transaction(s) are suspicious. Reasonable grounds may be a single behaviour or transaction or a combination of behaviour and/or transactions that leave you with a gut feeling that something isn't right. If you have this gut feeling, then you have reasonable grounds to suspect that the patron's behaviour and/or transaction(s) may be related to a money laundering or terrorist financing offence and you must report it.

### When Completing a STR:

- Identify all parties to the transaction that are suspicious.
- Take reasonable measures to identify third parties. Some reasonable measures are:
  - Searching previous reports or files to see if you can get name/address/identification information.
  - Asking other employees if they know the patron (e.g., Surveillance or other employees).
  - Avoiding tipping-off the patron. Sometimes the patron isn't asked for identification because it might alert the patron that they are being watched.
- Explain why the transaction is suspicious by identifying the suspicious behaviour or transaction(s).
- Link all relevant transactions to your STR.
- Write a descriptive clear narrative. When possible, include: denominations, dates, what the patron said or did that was odd or suspicious, where the transaction took place, if the transaction(s) and/or behaviour was a result of a monthly/quarterly review or a Surveillance observation.

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## Links and References

**FINTRAC** (Financial Transactions and Reports Analysis Centre of Canada) [www.fintrac-canafe.gc.ca](http://www.fintrac-canafe.gc.ca)

**OSFI** (Office of the Superintendent of Financial Institutions) [www.osfi-bsif.gc.ca](http://www.osfi-bsif.gc.ca)

**OLG AML Unit** – [#AML](#) (internal) and [AML@olg.ca](mailto:AML@olg.ca) (external)

### Report Fields

Did you know that each field in the FINTRAC reports is either mandatory, mandatory if applicable or you must make reasonable efforts to get the information? Reasonable efforts means that if the information is available to you, you **MUST** provide it. If it's not available to you at the time you complete the report, then you may leave the field blank.

*Note: If you need to indicate that a required field in your report is not applicable or if you made reasonable efforts to get the information required but it was just not available, leave the field blank. Do not enter "N/A" or "n/a" or substitute any other abbreviations, special characters (e.g., "x", "-" or "\*") or words (e.g., unknown). That said, there are exceptions where fields cannot be left blank, see FINTRAC Guidelines for further details.*

### FINTRAC Guidelines

For FINTRAC guidelines including more information on submitting FINTRAC reports and report fields visit the following website: *Government of Canada>Financial Transactions and Reports Analysis Centre of Canada>Guidance>All FINTRAC Guidelines* (<http://www.fintrac-canafe.gc.ca/publications/guide/guide-eng.asp>)

**LCTR** (Large Cash Transaction Report) – Guideline 7A

**CDR** (Casino Disbursement Report) – Guideline 10A

**STR** (Suspicious Transaction Report) – Guideline 3A

**EFT** (Electronic Funds Transfer) – Guideline 8A

**TPR** (Terrorist Property Reports) – Guideline 5

All record keeping and patron identification required for gaming site reports see Guideline 6F.

For general information on FINTRAC and the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)* see Guideline 1.

## What's an EFT

An EFT (Electronic Funds Transfer) is the transmission of instructions for a transfer of funds. Patrons will transfer funds by EFT to their gaming site front money or safekeeping account or they will have funds transferred from their gaming site's front money account to their financial institution or another gaming site. The EFT transfer can either be within Canada or International.

## Domestic and International Non-Swift EFT Report (Outgoing or Incoming EFT) - \$10,000 or more

**Domestic EFT-** An EFT report is not required If the EFT is sent and/or received within Canada.

**International EFT-** In most circumstances, an Outgoing (EFTO) and/or Incoming (EFTI) International Non-SWIFT EFT report is required to be reported to FINTRAC for international/cross-border transfers of \$10,000 or more (single transaction or cumulative) sent or received by a patron during a 24 hour gaming day.

## When an EFTO/EFTI is required

**EFTO (Outgoing)** When a gaming site does not provide the patron's name and address to the financial entity, the gaming site is responsible for sending an EFTO to FINTRAC.

**EFTI (Incoming)** When the EFT does not contain the patron's name and address in the beneficiary field but contains the gaming site and/or OLG as the beneficiary, the gaming site is responsible for sending an EFTI to FINTRAC.

## Verification of international EFT information - \$10,000 or more (Incoming)

The originator (who sent EFT), institution (international financial institution), receiving entity (generally gaming site or OLG as beneficiary), and receiving person's information (patron), are key pieces of information that should be reviewed to verify if an EFTI is required.

## Reporting Time Frame

The gaming site must send an EFTO or EFTI report to FINTRAC no later than five working days after the day the EFT is received or sent.

## 2 MTL/MAL

### What is a MTL/MAL

A MTL (Multiple Transaction Log) or a MAL (Multiple Action Log) is used to log and link transactions received and disbursed within a 24-hour gaming day.

### When is a MTL/MAL Required

An MTL/MAL is required for cash receipt or cash or cash equivalent disbursement transactions, received or disbursed within a 24-hour gaming day that are:

- \$2,500 CDN (or foreign currency equivalent) or more, made by a patron or another patron who the employee knows or has reason to believe is a third party.
- Under \$2,500 CDN (or foreign currency equivalent), made by a patron or another patron who the employee knows or has reason to believe is a third party, when the employee has reason to believe that the transaction is one of a series of transactions that may bring the patron to a total of \$10,000 or more.

### MTL/MAL Receipt Examples

- Purchase of chips, tokens or slot tickets
- Purchase of a casino cheque
- Foreign currency exchange
- Front money deposits
- Currency refining
- Safekeeping deposits
- Repayment of any form of credit, including markers and counter cheques
- Bets of currency

### MTL/MAL Disbursement Examples

- Redemption of chips, tokens, slot tickets, plaques, casino cheques or other negotiable instruments like certified cheques, OLG Lottery cheques (where applicable), bank drafts, traveler's cheques and counter cheques
- Payments to patrons on bets, including slot and table jackpots and tournament payouts
- Front money withdrawal ( to be deposited at financial institution in or outside Ontario)
- Safekeeping withdrawal
- Advances on any form of credit, including advanced by markers or counter cheques (does not include credit card advances)
- Payment to patrons of funds received for credit to that patron or any other patron
- Payment for draw or prize payout
- Reimbursement to patrons for travel and entertainment expenses (does not apply to "comps")

### Linking MTL/MAL

All transactions completed by a patron, during a 24-hour gaming day, must be linked to the correct patron profile. This is to ensure that a CDR or LCTR is triggered when the aggregate transactions reaches \$10,000 or more.

### Information Recorded

Patron's name (if available), loyalty number (where applicable), physical description (e.g. eye colour, facial hair).

### 3 CDR/LCTR

#### CDR Requirement – Within 24-Hour Gaming Day

A CDR (Casino Disbursement Report) is required for:

- **A Single Transaction** – if the total amount disbursed to the patron or a third party in cash or cash equivalents (e.g., cheque), is a single transaction of \$10,000 or more
- **Aggregated Transactions (MTL/MAL)** - if the aggregate cash or cash equivalent amount (made up of two or more disbursements each less than \$10,000) disbursed to the patron or a third party is equal to \$10,000 or more

#### CDR Requirement Examples

- Redemption of chips, tokens, plaques or slot tickets
- Redemption of casino cheques or other negotiable instruments like certified cheques, OLG Lottery Cheques (if applicable) bank drafts, traveler's cheques and counter cheques
- Payments to patrons on bets (e.g. sports bets), including slot and table jackpots and tournament payouts
- Front money withdrawal (e.g. front money withdrawal to be deposited at financial institution in or outside Ontario)
- Safekeeping withdrawal
- Advances on any form of credit, including advanced by markers or counter cheques (does not include credit card advances)
- Payment to patrons of funds received for credit to that patron or any other patron
- Payment for draw or prize payout
- Reimbursement to patrons for travel and entertainment expenses (does not apply to "comps")

#### LCTR Requirement – Within 24-Hour Gaming Day

A LCTR (Large Cash Transaction Report) is required for:

- **A Single Transaction** – if the total amount received from the patron or a third party in cash is a single transaction of \$10,000 or more
- **Aggregated Transactions (MTL/MAL)** - if the aggregate cash amount (made up of two or more receipts each less than \$10,000) received by the patron or a third party is equal to \$10,000 or more

#### LCTR Requirement Examples

- Purchase of chips, tokens or slot tickets
- Purchase of casino cheques (e.g., CDN cash for disbursement of U.S. cheque)
- Foreign currency exchange (equivalent to \$10,000 CDN or more)
- Currency refining
- Front money deposits
- Safekeeping deposits
- Repayment of any form of credit, including markers and counter cheques
- Bets of currency

## 4 CDR/LCTR Cont.

### Mandatory Fields

Here is the mandatory information required on a CDR/LCTR:

- Patron's full name (obtained through identification)
- Patron's full residential address (a P.O. Box or General Delivery address is NOT acceptable)
- Patron's date of birth
- Type, reference number and place of issuance of valid government issued photo identification used to verify patron's identity (e.g., driver's licence, passport)

NOTE: an Ontario Health Card in conjunction with non-photo ID, such as a birth certificate, is no longer acceptable

- Patron's occupation (must be specific)
- Details of the transaction including date, time, amount of cash received/disbursed and the type of currency and for LCTR disposition/type of transaction (e.g. purchase of chips)
- Patron's account number, type of account (e.g. front money), full name of account holder, and the type of currency in which account transactions are conducted
- How the cash or cash equivalents was received (e.g. in person)
- Name, position title, employee number and signature of the employee preparing the report
- Expiry date of identification, if one is available
- For CDR: Reason for disbursement (e.g. redemption of chips)
- For CDR: Method of disbursement (e.g. issued a cheque)

### Third Party Determination

You must take reasonable measures to determine if a patron is acting on behalf of a third party. If the patron is completing a transaction on behalf of another patron and has transactions of \$10,000 or more, you must complete a Third Party Disclosure, which is attached to the LCTR or CDR in the FINTRAC reporting database (usually a separate tab/section).

Mandatory third party information includes a patron's:

- Full Name (obtained through identification)
- Full Residential address (no P.O. Box or General Delivery addresses) including city, province/state, country and postal code or zip code
- We also must make reasonable efforts to obtain the third party's date of birth, occupation and the nature of their relationship to the patron

### Reporting Time Frame

A CDR/LCTR must be reported to FINTRAC within 15 calendar days after the transaction.

## 5 Insufficient/Sufficient Occupations

When a patron provides a vague occupation, ask questions and get more detail. For example, some patrons will just give you a vague job title like the examples below, if they say they're a clerk, owner or manager, ask more questions such as: What industry do you work in? What type of clerk or manager? What type of business do you own?

Here's a list of insufficient occupations that are too vague and a corresponding list of sufficient occupations that are specific.

<b>Insufficient Occupation</b>	<b>Sufficient Occupation</b>
Worker	Social Worker
Manager	Office Manager – RBC
Clerk	Grocery Store Clerk – Metro
Admin. Coordinator	Admin. Coordinator – Car Shop
Unemployed Disability	Unemployed on Disability
Engineer	Computer Engineer
Dispatcher	Dispatcher for Canada Post
I.T. Worker	I.T. Consultant – Ontario Public Service
Assistant	Legal Assistant / Real Estate Assistant
Consultant	Software Consultant
Business Owner	Furniture Store Owner
V.P.	V.P. Financial Operations
Installer	Swimming Pool Installer
Contractor	General Contractor – Great House Builders Inc.
Builder	House Builder
Manager	Financial Manager for Car Dealer
Supervisor	New Home Sales Supervisor
Coordinator	Travel Agent Coordinator
Salesperson/ Sales Associate	Furniture Salesperson / Lululemon Sales Associate
Director	Director of Financial Services
Self-Employed	Self-Employed Auto Repair Technician / Farmer
Unemployed	Unemployed-Former Dog Groomer
Cleaner	House Cleaner for Molly Maid
Owner of a Store	Owner of a Laundromat
General Manager	TELUS Store General Manager
Customer Service Rep.	MasterCard Customer Service Rep.
Assembly Line	Assembly Line Worker-Kawasaki

## 5 Insufficient/Sufficient Occupations

## 6 Insufficient/Sufficient Occupations Cont.

When a patron provides a vague occupation, ask questions and get more detail. For example, some patrons will provide their area of work like the examples below. If the patron says they're in the electrical business or motorcycle industry, ask more questions such as: What is your job title? What do you do in the electrical business? Do you work in a motorcycle store? What is your job title there?

<b>Insufficient Occupation</b>	<b>Sufficient Occupation</b>
Jewelry Store	Jewelry Repair Person
Works with Kids	Nanny
Nail Salon	Nail Technician
Beauty Supply Store	Cashier-Beauty Supply Store
Hydro One	H.R. Manager for Hydro One
Dominos	Pizza Delivery Person-Dominos
Lucky Investments	Investment Co. Owner
Construction	Roofer / Welder
Human Resources	Human Resource Assistant
Auditing	Casino Auditor

Slot Business	Casino Slot Attendant
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Compliance Business	Bank Compliance Officer
General Motors	Assembly Line Worker – GM
Automotive Company	Janitor at Toyota
Motorcycle Industry	Motorcycle Parts Salesperson
Dental Sales	Salesperson-Dental Tool Co.
Tim Hortons	Cashier at Tim Hortons
Works at Walmart	Assistant Manager at Walmart
Apple Store Sales	Senior Salesperson Apple Computers
Starbucks	Barista for Starbucks
Canada Revenue Agency	Auditor's Assistant
Insurance Company	Underwriter for Insurance Co.
T.T.C.	Bus Driver – T.T.C.
Electrical Business	Electrician for home builder

Note: "Retired" can be a sufficient occupation; however, if the patron is 20 years old or of an age where they may not be of age to retire, "retired" may be a suspicious indicator.

## 6 Insufficient/Sufficient Occupations Cont.

## 7 Gaming Site Suspicious Indicators

Currency Refining	A patron exchanges small denomination bills for large denomination bills.
Structuring	A patron appears to be avoiding reporting thresholds of \$10,000 and/or tracking thresholds of \$2,500.
Identification	A patron appears unwilling to present identification or presents identification that is invalid or false.
Minimal Play or No Play	A patron plays minimal or has no play. (e.g., the patron buys \$8,000 in chips and walks away – no play. Or the patron bets \$100 of the \$8,000 and plays for 15 minutes and cashes out – minimal play).
Third Party	A patron conducts suspicious transactions that appear to be on behalf of a third party. (e.g., a lady asks her friend to accept the slot jackpot of \$15,000 because she doesn't want to show identification. The lady is a third party.)
Cheques	A patron conducts suspicious transaction(s) involving the gaming site's disbursement of cheques. (e.g., a patron receives 50 gaming cheques in a four month period totalling \$230,000 for small and large wins).
Monetary Instruments	A patron conducts suspicious transaction(s) involving a monetary instrument(s) (such as cheques, traveler's cheques, bank drafts, money orders) (e.g., a patron redeems a large quantity or dollar amount of traveler's cheques with no or minimal play).
Foreign Exchange	<p>A patron conducts suspicious transaction(s) involving an exchange of currencies such as:</p> <ul style="list-style-type: none"> <li>• A patron changes U.S. cash to Canadian cash but no or minimal play</li> <li>• A patron changes U.S. cash to Canadian cash but always under the \$3,000 identification threshold</li> <li>• Third party currency exchange</li> <li>• A patron exchanges a large amount of U.S. small denomination bills for large denomination U.S. bills or Canadian bills or another foreign currency</li> <li>• A patron completes a lot of large currency exchange transactions in a short period</li> <li>• The patron doesn't know how much money is being exchanged</li> <li>• The large exchange transaction does not match the patron's occupation</li> </ul>
Suspicious Cash	A patron presents cash in a suspicious manner such as: strapped or bundled; in elastic bands of the same or different colour; in a plastic bag, in a backpack, gym bag or large envelope; odour is unusual (smells like marijuana, musty or has mildew); marked with coloured dye

## 7 Gaming Site Suspicious Indicators

## 8 Gaming Site Suspicious Indicators Cont.

Occupation	A patron provides an occupation that is low-earning (e.g. cashier) or non-earning (e.g. unemployed) and appears to spend more than they would earn. Or the patron keeps changing their occupation.
Adverse Media	An employee completes an internet search and the patron's name is connected to bad media. The bad media information is added to the STR.
False Information	A patron is asked for his name and provides different names at different times/days.
Credit & Credit Cards	A patron uses multiple credit cards to obtain a cash advance or obtains credit and shows no or minimal gaming activity.
Front Money & Gaming Accounts	A patron wires an amount (e.g., \$100,000) to her front money account. The patron then withdraws under \$10,000 each week for several months but shows no or minimal gaming activity.
Wire Transfers	A patron wires an amount (e.g., \$50,000) to her front money account and withdraws an amount (e.g., \$5,000) each week. She plays minimal and then requests a cheque. She requests a wire transfer from her front money account to her bank each week.

Geographic Distance	A patron conducts suspicious transaction(s) and lives a long distance (e.g., 300 kms) away from the gaming site.
Address	A patron shares an address with multiple unrelated patrons.
Multiple Sites	A patron conducts suspicious transactions at many gaming sites.
Player's Loyalty Card Aversion	A patron appears unwilling to use a gaming site loyalty card despite excessive play that would provide significant rewards.
Atypical Behaviour	A patron exhibits behaviour that is abnormal compared to a typical gaming site patron.
Trespass Self-Excluded	A patron hits a jackpot (e.g., \$10,000) and is asked for identification, says it's in car but doesn't return to gaming site. This behaviour is suspicious but he or she may be trespassed or self-excluded and he or she will be discovered if shows ID.
Suspected Terrorist	The patron's name and date of birth is similar to a name and date of birth on the terrorist lists provided by the Office of the Superintendent of Financial Institutions (OSFI).
Criminal Activity	The gaming site questions the source of the patron's funds (e.g. drug trafficking).
Influence or Bribe	A patron tries to influence, bribe or corrupt a gaming site employee.

## 8 Gaming Site Suspicious Indicators Cont.