

## WHY SHOULD THE GAMING SECTOR ENGAGE IN AML / CFT COMPLIANCE?

### TARGET

The gaming industry is a target for criminals to launder profits obtained through illicit activity.

### DNFBPs

Businesses within the gaming industry such as casinos, gambling halls etc. fall under the category of designated non-financial businesses and professions (DNFBPs). These entities are at risk of money laundering since:

- They offer conversion and transfer of large sums of money for entertainment;
- Undertake some financial activities that are similar to financial institutions.

### Transactions

Some gaming entities have services available 24 hours a day. They accept funds on accounts to:

- conduct money exchange;
- conduct money transfers;
- foreign currency exchanges;
- stored value services;
- debit card cashing facilities;
- cheque cashing;
- safety deposit boxes; etc. in many cases
- services are available 24 hours a day.

## WHY SHOULD THE GAMING SECTOR ENGAGE IN AML / CFT COMPLIANCE?

Ensure that all employees receive Anti Money Laundering / Combating the Financing of Terrorism (AML/CFT) training so that suspicious activity can be observed, recorded and reported.

Ensure internal controls are followed along with automated data processing systems that ensure compliance.

Conduct customer due diligence.

Ensure that gaming is conducted honestly by approving the rules of the games and requiring the operator to provide a high standard of surveillance and security systems.

Update personnel/staff on any identification of unusual or suspicious transactions and evolving trends.

Money Laundering Reporting Officer (MLRO) and other designated personnel should ensure that they can use all available info to determine the occurrence of suspicious transactions or patterns.

## SOME GAMING INDUSTRY INDICATORS

- Transactions kept below respective threshold to avoid reporting requirements.
- Unknown source of chips or funds.
- Two or more individuals evidently working together.
- Alteration or cancellation of transactions to avoid threshold reporting requirement.
- Customer inserts cash into gaming machine and credits out with little or no game play.
- Gambler provides no information, or false information.
- Inconsistent or fraudulent ID.
- Name varies from one game to the next.
- Gambler is known to be the subject of adverse media information.
- Gambler is linked to organised criminal activity.
- Confusing details about transactions.
- Unwilling to provide source of funds; concerned about reporting thresholds.
- Winnings cheque requested in 3rd party's name.

### Financial Intelligence Agency

201 Cabot House, Graceway Plaza  
Leeward Highway, Providenciales  
Turks & Caicos Islands TKCA1ZZ  
Office: (649) 941-7691/3692/8429  
Fax: (649) 941-7690  
Email: [submissions@fia.tc](mailto:submissions@fia.tc)

[www.fia.tc](http://www.fia.tc)



# The Financial Intelligence Agency

Turks and Caicos Islands

## Guidance for The Gaming Sector

# THE FINANCIAL INTELLIGENCE AGENCY (FIA)

The Financial Intelligence Agency (FIA) serves as the Financial Intelligence Unit (FIU) for the Turks and Caicos Islands (TCI). It was established under the Financial Intelligence Agency Ordinance in 2014. It is one of more than 160 FIUs making up the Egmont Group of FIUs and is required under the Financial Action Task Force (FATF) recommendations to be established in the TCI.

## MISSION

To identify perpetrators of money laundering, terrorist financing and connected crimes for dissemination to relevant authorities for further investigation.

## VISION

That where it occurs, perpetrators of money laundering, terrorist financing and connected crimes are detected and brought to justice, ultimately becoming a deterrent to the commission of these offences in the Turks and Caicos Islands.

## ROLE OF THE FIA

(FIA Ordinance 2014)

The FIA is an independent agency established under law.

The FIA receives reports of Suspicious transactions from financial institutions and other persons

The FIA gathers, stores, analyse and disseminate information to law enforcement authorities and relevant bodies; and for connected purposes.

## SUSPICIOUS TRANSACTION REPORTS/ SUSPICIOUS ACTIVITY REPORTS (STRS/SARS)

**WITHIN THE CONTEXT OF MONEY LAUNDERING, SUSPICIOUS ACTIVITY IS ANY CONDUCT OR ATTEMPTED TRANSACTION OR PATTERN OF TRANSACTIONS THAT YOU KNOW, SUSPECT OR HAVE REASON TO SUSPECT MEET ANY OF THE FOLLOWING CONDITIONS:**

1. The person conducting the transaction is engaging in Money Laundering.
2. Involves money from criminal activity.
3. Is designed to evade Anti-Money Laundering requirements, whether through structuring or other means.
4. Appears to serve no business or other legal purpose and for and which facts provide no reasonable explanation.
5. Involves use of business/companies to facilitate criminal activity.

Note: In any instances where the above patterns are identified a STR/SAR should be reported.

## WHY IS IT REQUIRED THAT THE FIA BE PROVIDED WITH SAR INFORMATION?

### FINANCIAL ACTION TASK FORCE 40 RECOMMENDATIONS

“Rec 29 – Countries should establish a financial intelligence unit (FIU) that serves as a national center for the receipt and analysis of:

- (a) suspicious transaction reports; and
- (b) other information relevant to money laundering, associated predicate offences and terrorist financing, and for the dissemination of the results of that analysis.

The FIU should be able to obtain additional information from reporting entities and should have access on a timely basis to the financial, administrative and law enforcement information that it requires to undertake its functions properly.”

## WHAT IS MONEY LAUNDERING?

Money laundering occurs when one attempts to make illegally obtained money appear to have been derived from legal sources. Below are the stages of money laundering:

