**CASINO**

The overall risk assessment rating for casinos is **HIGH**.

The features identified in the table of this guide will help casinos conduct risk assessments.

They will help you create policies and procedures which accurately reflect how much money laundering risk you think your business is subject to.

The table does not cover every way a money launderer may use your business. It reflects ways that money launderers have acted in the past. We encourage you to think about other situations that may apply to your specific business.

Transactions or activities listed in the table may not necessarily signal money laundering if they are consistent with a customer’s legitimate business.

Based on knowledge of your own business as a casino you should decide what risk particular customers or transactions pose and how you can lessen that risk.

|  | **HIGHER RISK CHARACTERISTICS** | **LOWER RISK CHARACTERISTICS** |
| --- | --- | --- |
| **Casino Products and Services** | Gaming Facilities | Customers receiving cash or cheques in return for redeeming chips, tickets, or tokens. For example a customer receiving a large amount of cash without gambling for large denomination bills; |  |
| Account Facilities | Use of casino deposit accounts to deposit and withdraw without gambling or minimal play; |  |
| Use of offshore accounts; |  |
| Use of cheque cashing/ credit facilities;  |  |
| **Types of Customer**  | Junket operators/ representatives providing premium players; |  |
| Junket organisers who ‘pool’ funds of individual customers; |  |
| Casino patrons or players participating in junket or overseas commission based player (OCBP) arrangements; |
| Customers that are Politically Exposed Persons (PEPs); |  |
| Customers based in, or conducting business in or through a high risk country, or a country with known levels of corruption, organised crime, or drug production and, or distribution; |  |
| **Customer Behaviour** | Customers who become high spenders because of their cumulative spending over time (For example, a customer who consistently gambles a medium amount of money over a period of time, or a casual customer who gambles a relatively large amount of money on a limited number of visits); |  |
| Customers carrying out several transactions below the amount needing identity checks within a short time; |  |
| Disproportionate spenders, for example, where spending patterns changes, that is it dramatically increases or their rated play does not fit their playing profile; |  |
| Cash deposits by customers which are large compared to the casino’s average. Or, unusual because of the customer’s financial status; |  |
| Casual customers or unknown customers who buy large amounts of chips with cash at table games. Then engage in little or no play, and then redeem the chips for large denomination bills, casino cheques or money or wire transfers; |  |
| **Third-Party Relationships** | Use of third parties to buy chips, or to gamble on behalf of others with minimal play (which may include early or high cash outs), or cash out/ redemption of chips for larger denomination currency, etc. |  |