

CTR Cheat Sheet: Path to Filing a Currency Transaction Report**1. Cash Activity Occurs**

- A patron engages in one or more cash transactions totaling over \$10,000 in a single gaming day
- Examples include:
 - Buying chips with cash
 - Cashing out chips or tickets for cash
 - Cash advances or check cashing with cash payout

2. Staff Identifies Potential CTR-Level Transaction

- Staff roles: cage cashier, pit clerk, slot attendant, sportsbook, players club
- Staff observes a single large transaction OR multiple smaller cash transactions that may aggregate to over \$10,000

3. Internal Transaction Logging

- Transactions are recorded using:
 - Monetary Transaction Logs (MTLs) or
 - Monetary Instrument Logs (MTLs)

4. Properly Identify Patron

- If a CTR is triggered or approaching, staff must verify and record:
 - Full legal name
 - Residential address (no P.O. boxes)
 - Tax Identification Number (TIN or SSN)
 - Date of Birth
 - Valid, government-issued photo ID
 - Any other identifying information required internally (occupation, player ID, etc.)
- Staff notes:
 - Time, location, amount, ID info
 - Surveillance requested if appropriate



6. Aggregation by Compliance

- Title 31 Compliance Officer:
 - Reviews all cash-in/cash-out activity across departments
 - Aggregates by Name, Date of Birth, SSN, and Player ID
 - Verifies total exceeds \$10,000 in a gaming day and is not suspicious (if it is suspicious a SAR will need to be filed as well)

7. CTR Prepared and Filed

- FinCEN Form 112 is completed with:
 - Patron and casino info
 - Exact amounts and transaction types
- CTR is filed electronically through BSA E-Filing System
- Must be submitted within 15 calendar days

8. Recordkeeping

- All relevant documents must be stored for 5 years
 - MTLs
 - Copies of ID
 - Internal logs
 - Surveillance references