

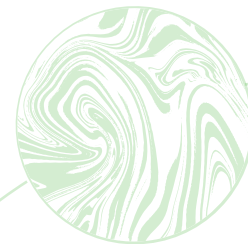
Regulator Field-Review Checklist

- Risk Assessment is current and in use (covers sportsbook, kiosks, TITO, cashless/wallets, hotel/cage touchpoints, third-party operators where applicable; maps to National AML/CFT Priorities; updated at least annually and after product/channel changes).
- Program pillars are effective: documented internal controls; designated BSA Officer; role-specific training; independent testing cadence that matches risk; procedures use “all available information” across systems (loyalty, cage, kiosk, sportsbook, hotel, TITO/cashless).
- Aggregation logic validated: single defined gaming day; cash-in and cash-out aggregated separately; cross-system joins work (cage+kiosk+sportsbook+hotel+TITO/cashless); third-party sportsbook activity included; chip purchase/redemption scenarios covered.
- CTR controls: filed within 15 calendar days; separate cash-in/out totals; exemptions handled correctly; identity/TIN verified; remediation when ID info missing is documented.
- SAR lifecycle: threshold \$5,000; alerts triaged; investigations documented; decisions tracked; filed within 30/60 days; narrative quality (who/what/when/where/how/pattern/why suspicious + relevant Key Terms); SAR confidentiality enforced; regulator access protocol documented.
- Monetary instruments \geq \$3,000: logs complete and reconciled; OFAC checks performed per policy; limits/holds consistent with RA; exceptions documented and approved.
- 314(b) information-sharing: enrollment status verified; procedures defined; evidence of appropriate requests/responses and secure handling.
- Training: annual (or risk-based) and role-specific for cage, sportsbook, surveillance, hosts, revenue audit; content includes current red flags (human trafficking/smuggling, sportsbook patterns, cashless churn); attendance and quiz results retained; contractor coverage confirmed.
- Independent testing: scope reflects current products (sportsbook, kiosks, cashless); sampling and data-lineage testing performed; findings have owners and due dates; remediation tracked; retesting evidence retained; results reported to management/regulator.
- Data integrity & records: retention schedules met; secure access controls; exception queues reviewed and resolved; reconciliations tie system totals to physical counts; report archives organized and retrievable.



Operator Quick-Reference

- CTR basics: > \$10,000 cash-in OR cash-out in a gaming day; aggregate cash-in and cash-out separately; one property-wide gaming day; file within 15 calendar days. Never split transactions to avoid a CTR.
- SAR basics: \$5,000+ with suspicion; file in 30 days (up to 60 if no subject yet). Narrative: who/what/when/where/how much; pattern over time; why suspicious; add relevant Key Terms. Never tip off the customer.
- Use ALL available information before deciding “no CTR/SAR”: loyalty ID, cage/kiosk, sportsbook, hotel, TITO/cashless, markers/credit; include third-party operator data.
- Common misses: kiosk structuring; rapid wallet load/unload churn; chip walking; third-party funds at sportsbook; bursts of TITO redemption; promo abuse; activity tied to human trafficking/smuggling red flags.
- Documentation: keep investigation notes, approvals, and filings; maintain training records; escalate issues promptly to the BSA Officer.



SAR Narrative Framework

- Lead with the essentials: who (name, DOB, loyalty/Acct IDs), what (activity), where (locations/channels), when (timeline), how much (amounts and instruments).
- Describe the pattern: sequence of events across dates and systems (cage, sportsbook, kiosk, cashless, hotel). Note prior history, velocity, structuring, third-party involvement.
- Explain why it's suspicious: tie behaviors to known red flags (e.g., trafficking/smuggling, sanctions evasion, fraud, sportsbook arbitrage/hedging inconsistent with profile).
- Add relevant Key Terms (e.g., Sports Wagering, Human Trafficking, Structuring) within the narrative for law-enforcement triage.
- State actions taken: account reviews/holds, interviews, refusals/closures, 314(b) outreach, law-enforcement contact (if any).
- Attachments & references: list supporting reports, video timestamps, screenshots, logs; ensure retention for 5 years.



**TITLE 31
CHANGES ARE COMING**

