

FinCEN AML/CFT National Priorities

Based on FinCEN's Government-Wide AML/CFT Priorities (June 30, 2021).

Use this as a quick mapping aid for your risk assessment and training.

Corruption

- What it is: Abuse of public office or entrusted power for private gain (e.g., bribery, embezzlement, kickbacks).
- Where it might appear in Tribal casinos: Watch for unusual payments tied to licensing, contracting, or vendor selection; gifts/benefits offered to staff with approval authority; third-party consultants with opaque roles.

Cybercrime (including virtual assets)

- What it is: Computer-enabled theft/fraud, ransomware, account takeovers, and misuse of digital assets to move value.
- Where it might appear in Tribal casinos: System intrusions targeting cage/surveillance data, wallet or sportsbook accounts; rapid account access changes; crypto-to-cash conversions via third parties.

Terrorist Financing

- What it is: Funds raised, moved, or stored to support acts of terrorism (domestic or international).
- Where it might appear in Tribal casinos: Unusual small-dollar funnels from multiple sources, structured purchases of chips/tickets with minimal play, attempts to move value through refund/redemption channels.

Fraud

- What it is: Schemes to obtain money by deception (check/ACH card fraud, bonus abuse, elder fraud, romance scams).
- Where it might appear in Tribal casinos: Chargeback spikes; multiple accounts tied to shared devices/IPs; promo/bonus cycling; third-party cash at sportsbook or cage; suspicious TITO redemption patterns.

Transnational Criminal Organizations

- What it is: Networks engaged in multi-jurisdictional crimes (drug, human, wildlife, counterfeit, financial).
- Where it might appear in Tribal casinos: Coordinated activity by groups; courier cash movements; cross-border patron activity inconsistent with profile; use of proxies to buy chips or load wallets.

Drug Trafficking Organizations

- What it is: Manufacture/transport/sale of controlled substances and laundering of proceeds.
- Where it might appear in Tribal casinos: High-volume cash with minimal gaming; frequent buy-ins and quick redemptions; third-party cash exchanges at cage; ties to known trafficking corridors.

Human Trafficking & Human Smuggling

- What it is: Exploitation of persons for labor/sex; or illicit facilitation of border movement for profit.
- Where it might appear in Tribal casinos: Payments for rooms/food/transport by non-playing sponsors; multiple patrons controlled by one payer; repeated late-night redemptions; indicators observed by hotel/security teams.

Proliferation Financing

- What it is: Funding procurement or movement of materials/technology for weapons of mass destruction.
- Where it might appear in Tribal casinos: Patron or vendor ties to sanctioned parties or embargoed regions; unusual payments routed through higher-risk jurisdictions; OFAC screening hits or evasive behavior.

