

**SAR Cheat Sheet: Path to Filing a Suspicious Activity Report****1. Suspicious Activity Occurs**

- A patron engages in behavior that suggests potential financial crime
- Examples include:
  - Structuring: breaking up transactions to avoid \$10,000 CTR threshold
  - Rapid buy-ins and immediate cash-outs
  - Sudden large transactions inconsistent with known behavior (excluding jackpots)
  - Multiple or altered IDs
  - Refusing to provide ID when required
  - Third-party transactions (e.g., another person cashing out for them)
  - Attempts to avoid reporting thresholds
- Every staff member in the operation is responsible for recognizing and reporting red flags

**3. Staff Observation & Reporting**

- Employee (cage, slot, table games, players club, surveillance, etc.):
  - Sees something suspicious
  - Hears something concerning
  - Is approached in a questionable way
    - Immediately reports suspicious activity to their supervisor or compliance officer

**4. Internal Incident Report Created**

- Staff submits:
  - Written or digital incident report
  - Includes what was observed, where, and by whom
- Supervisor or surveillance may review footage, transactions logs or interview staff involved

**5. Compliance Officer Reviews**

- Compliance Officer investigates:
  - Transaction history, ID details, surveillance

- MTLs and internal logs

## 6. SAR Decision & Preparation

- SAR is filed if:
  - Transaction involves or aggregates to \$5,000 or more
  - Casino knows, suspects, or has reason to suspect activity:
    - Involves funds derived from illegal activity
    - Is intended to evade BSA reporting
    - Has no business or lawful purpose
    - Is inconsistent with known customer behavior
- FinCEN Form 111 is then completed with:
  - Full narrative of what occurred and why it's suspicious
    - Detailed narrative explaining suspicious activity and supporting facts
    - Precise dates/times, amounts, locations
  - Patron info (if known)

## 7. SAR Filing

- SAR is electronically filed via BSA E-Filing System
- Deadline: 30 calendar days from detection (may extend to 60 days if no suspect is identified)

## 8. Confidentiality & Recordkeeping

- Do not inform the patron that a SAR was filed
- SARs are confidential by federal law
- Retain SARs and supporting documents for 5 years
  - Supporting documents include:
    - SAR log or filing register
    - Corresponding reports
    - Surveillance logs
    - Transaction history