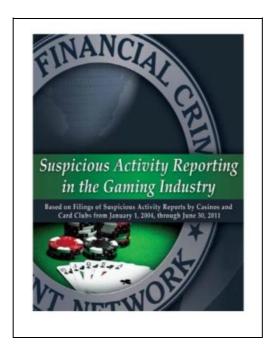
# Suspicious Activity Reporting in the Gaming Industry



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(Lora Johns III)

#### SUSPICIOUS ACTIVITY REPORTING IN THE GAMING INDUSTRY



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Createspace, United States, 2014. Paperback. Book Condition: New. 279 x 216 mm. Language: English. Brand New Book \*\*\*\*\* Print on Demand \*\*\*\*\*\*.Gaming institutions covered by FinCEN's regulations submitted 74,816 Suspicious Activity Report by Casinos and Card Clubs (SAR-C) filings from 2004 through June 2011. Dollar amounts reported in these filings totaled \$1.77 billion. Annual filings consistently increased, while total dollar amounts fluctuated from year to year. The steady increase in SAR-C filings during the study period paralleled a significant expansion of gaming operations across the United States. State-licensed casinos filed about 70 percent of the SAR-Cs and accounted for about 80 percent of the reported dollar amount of suspicious activity. Tribal casinos submitted approximately 26 percent of the filings and accounted for 16 percent of the dollar amount. Card clubs submitted 2 percent of the filings and accounted for 2 percent of the dollar amount. New Jersey and Nevada are by far the states with the highest number of SAR-C filings. Together, they accounted for 41 percent of all filings over the period and 61 percent of the reported dollar amount. New Jersey casinos filed the highest number of reports, while Nevada casinos reported the highest total dollar amount. More than 40 percent of the filings reported suspicious activities characterized as structuring. The reports frequently described activities involving chip, jackpot and token redemptions, which customers may have structured to avoid currency transaction reporting requirements. The second most frequently reported characterization of suspicious activity was Other. In these SAR-Cs, narratives often described situations in which patrons or employees displayed unusual behavior or violated casino policies. The third most frequent characterization was Minimal Gaming with Large Transactions. The narratives in these reports described situations in which patrons bought chips or deposited funds into their casino front money accounts and then...



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