

Suspicious Activity Information – Narrative Explanation/Description

Explanation/Description of Known or Suspected Violation of Law(s) or Suspicious Activity – provide a clear and concise account of the possible violation of law(s). Describe in detail what is unusual, irregular or suspicious about the activity. Use the checklist below as you prepare your account. This section of the report is CRITICAL. The care with which it is written may make the difference in whether or not the described suspicious conduct and/or its possible criminal nature are clearly understood.

- Provide a brief chronological summary of the suspicious activity.
- Indicate where the possible violation of law(s) took place (i.e. branch, cage, specific gaming pit/area, etc.).
- Explain who benefited, financially or otherwise, from the transaction(s); how much and how; and whether completed or only attempted.
- Describe suspect's position if a casino employee (i.e. dealer, pit supervisor, cage cashier, host, director of marketing, etc.).
- Indicate whether funds or assets were recovered and, if so, enter the dollar value of the recovery in whole dollars only.
- Indicate whether the possible violation of law(s) is an isolated incident or relates to another transaction.
- Indicate whether there is any other related litigation; if so, specify status.
- Describe supporting documentation, including any video or audio tapes and credit bureau report which relate to the activity.
- Describe any additional information which is necessary to fully understand the unusual, irregular or suspicious nature of the activity.
- Recommend any further investigation that might assist law enforcement authorities.

For Money Laundering, Structuring or Wire Transfer referrals, please include the following additional information:

- Indicate whether U.S. or foreign currency and/or monetary instruments were involved. If so, provide the amount and/or description.
- Indicate any additional casino account numbers and any domestic or foreign banks and/or account numbers which may be involved.
- Indicate for a foreign national any available information on U.S. or foreign visas including country and/or city of issuance, or temporary U.S. address.

Retain For a Period of Five years:

- All supporting documentation, including any video or audio tapes and credit bureau reports which relate to the suspicious activity.
- Any confession, admission or explanation of the transactions provided by the suspect(s) and indicate to whom and when it was given.
- Any confession, admission, explanation or interview concerning the transactions provided by any other person(s) and indicate to whom and when it was given.
- Any evidence of cover-up or evidence of an attempt to deceive federal or state gaming regulators or others.

All supporting documentation must be made available, upon request, to appropriate law enforcement authorities and regulatory agencies.

The material included in this PDF document constitutes a 'fair use' of any copyrighted material as provided for in Section 107 of the U.S. Copyright law which allows for education, teaching (including multiple copies for classroom use), scholarship, or research and is not deemed an infringement of copyright in the eyes of the law.

§ 107 . Limitations on exclusive rights: Fair use⁴⁰

Notwithstanding the provisions of sections 106 and 106A, the fair use of a copyrighted work, including such use by reproduction in copies or phonorecords or by any other means specified by that section, for purposes such as criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research, is not an infringement of copyright. In determining whether the use made of a work in any particular case is a fair use the factors to be considered shall include—

- (1) the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes;
- (2) the nature of the copyrighted work;
- (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and
- (4) the effect of the use upon the potential market for or value of the copyrighted work.

The fact that a work is unpublished shall not itself bar a finding of fair use if such finding is made upon consideration of all the above factors.