

MISSOURI GAMING COMMISSION  
MINIMUM INTERNAL CONTROL STANDARDS  
CHAPTER K - CURRENCY TRANSACTION REPORTING

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**§ 1 General**

- 1.01 Each Class B Licensee shall ensure that the minimum reporting requirements for Currency Transaction Reports (CTR) are satisfied.
- 1.02 Each Class B Licensee shall designate in the internal controls the job title of the specific person (CTR Compliance Officer) responsible for the day-to-day compliance with the CTR requirements.
- 1.03 Each Class B Licensee will be responsible for developing a training program for casino personnel on compliance with the CTR requirements.
- 1.04 Compliance with the MICS does not release the Class B Licensee from its obligation to comply with all applicable state and federal regulations.
- 1.05 Systems for tracking currency transactions, such as automated tracking, shall be described in the internal controls.
- 1.06 The cash transactions referred to in this chapter include, but are not limited to:
  - (A) Cash In:
    - (1) safekeeping deposits;
    - (2) purchase of a casino check by a patron;
    - (3) purchase of chips;
    - (4) exchange of currency for currency, including foreign currency;
    - (5) bills inserted in EGDs, if identifiable to a patron and available from the system;
    - (6) payment on credit instruments; and
    - (7) any other transaction where cash comes from the patron to the cage.
  - (B) Cash Out:
    - (1) chip redemptions;
    - (2) payment of winnings, except slot jackpots;
    - (3) safekeeping withdrawals;
    - (4) cashing checks;
    - (5) exchange of currency for currency, including foreign currency;
    - (6) EGD tickets redeemed at the cage;
    - (7) EGD tickets inserted in kiosks, if identifiable to a patron and available from the system;
    - (8) credit meter payouts; and
    - (9) acceptance of credit instruments.

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**§ 2 Logging Cash Transactions In Excess of \$3,000**

- 2.01 Single cash transactions, as identified in section 1 of this chapter, in excess of \$3,000 and known aggregate transactions in the same directional flow that exceed \$3,000 must be logged in the appropriate department's multiple transaction log (MTL). These logs shall cover the entire gaming day.
- 2.02 The internal controls shall indicate which departments maintain multiple transaction logs. If a computerized log is shared by departments, the internal controls shall indicate which departments share the log.
- 2.03 Once a patron's known aggregate cash activity in the same directional flow has exceeded \$3,000, all additional cash transactions identifiable to the patron of \$500 or more must be logged regardless of location.
- 2.04 The employee conducting a single cash transaction in excess of \$3,000 with a patron is responsible for ensuring the transaction is recorded on the multiple transaction log. The employee is not personally required to complete the log, but must verify that the entry is completed. Transactions under \$3,000 which must be logged because the patron's aggregate cash activity exceeded \$3,000 in the same directional flow shall be logged by the employee who has knowledge of the aggregate cash activity.
- 2.05 Employees required to record MTL entries shall review the multiple transaction logs at the beginning of their shift to familiarize themselves with the cash activity that occurred during the previous shift(s) that gaming day.
- 2.06 If manual logs are used, the completed multiple transaction logs shall be submitted to the appropriate audit department on a daily basis. If no activity occurs on the log for a given department, this shall be indicated on the log that is submitted.
- 2.07 If a patron refuses to provide his/her name for a cash transaction, such refusal shall be documented on the MTL by the employee.

**§ 3 Reportable Transactions**

- 3.01 All cash transactions in excess of \$10,000 must be reported on a CTR. This includes any single transaction or series of related multiple transactions conducted by, or on behalf of the same patron, with the same directional flow within the same gaming day.
- 3.02 The employee conducting the transaction which triggered the requirement for a CTR is responsible for obtaining all the required information for the proper completion of the CTR. The CTR shall be prepared by the individual conducting the transaction or by an

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individual(s) whose job title is specified in the internal controls as being designated to perform this duty. When the need for a CTR is not able to be determined until additional information regarding cash transactions for that patron, which was not available to the employee on the gaming floor, was compiled after the end of the gaming day, the CTR shall be prepared by the individual performing the compilation process or by an individual whose job title is specified in the internal controls as being designated to perform this duty.

- 3.03 All CTRs must be properly filed with the Financial Crimes Enforcement Network (FinCEN) by the 15th day after the date of the transaction. The submission confirmation documentation shall be maintained. At the time of submission an electronic copy of each CTR shall be submitted to the MGC Boat Sergeant.

**§ 4 Obtaining and Verifying Identification**

- 4.01 Prior to concluding a single cash transaction in excess of \$10,000 or any other transaction which causes the patron's total cash in or cash out to exceed \$10,000, the following patron identification information shall be obtained:
- (A) patron's last name, first name, and (if provided) middle initial;
  - (B) patron's full address, including number and street, city, state, zip code, and country if other than United States;
  - (C) patron's social security number;
  - (D) patron's date of birth;
  - (E) passport number or alien identification number and issuing country if a patron is an alien or non-resident of the United States, if presented; and
  - (F) type of identification used to verify the above information, including the identification number and state/country of issuance.
- 4.02 If an individual (agent) is conducting a transaction on behalf of another individual, the same identification information as required for the patron conducting the transaction must be obtained for the person serving as the agent. This is in addition to the information required for the individual for whom the transaction is being conducted.
- 4.03 All identification information must be verified by examining the identification presented by the patron. For a patron for whom a safekeeping deposit has been accepted with proper identification, check cashing authority has been granted, or for whom a CTR containing verified identity has been filed, acceptable identification information obtained previously and maintained in the Class B Licensee's internal records may be used, as long as the following conditions are met:
- (A) the patron's identity is re-verified at least every two years;
  - (B) any out-of-date identifying information is updated in the internal records;
  - (C) the date of each re-verification is noted in the internal records; and
  - (D) the identification has not expired.

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- 4.04 Acceptable identification for U.S. residents includes valid, non-expired:
- (A) driver's license. The photo requirement may be waived on the license if issued by jurisdictions not requiring a photo;
  - (B) U.S. passport;
  - (C) other state-issued photo I.D. cards. The photo requirement may be waived on identification issued by jurisdictions not requiring a photo;
  - (D) military identification card or military dependent card; or
  - (E) other form of picture ID with either a social security card or a birth certificate.
- 4.05 Acceptable identification for aliens or non-residents includes valid, non-expired:
- (A) Passport;
  - (B) Alien registration card; or
  - (C) Other official documents evidencing nationality or residence (e.g., Provincial Driver's License).
- 4.06 If the need for a CTR is not determined until the end of the day compilation process, the individual's identification information may be obtained from existing records, if available.
- 4.07 For each CTR, a clear copy of the photo identification used to verify the patron's identity (either the one in the system or the one presented) shall be kept on file with the CTR. If a clear copy of photo identification is not available, Surveillance shall be notified prior to the completion of the qualifying transaction and the surveillance employee shall obtain at least one photograph of the patron from the surveillance camera. The surveillance photo of the patron shall be kept on file with the CTR. The photograph or the image file shall be labeled with the patron's name. If the need for a CTR is not determined until the end of the day compilation process has occurred, a photo or a copy of the patron's identification from existing records may be used even if the identification is expired.
- 4.08 If the patron is unable to provide any of the above information or the identification provided is not acceptable, the transaction must be refused until the necessary information has been obtained.
- 4.09 If a patron refuses to provide proper identification, all cash transactions shall be stopped and the patron shall be barred from any further gaming activity until adequate identification is provided.
- 4.10 If the denied transaction involves chip redemptions and the patron is unable to provide adequate identification, the patron has the option of keeping the chips or placing them on deposit. If the denied transaction involves the payment of winnings and the patron is

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unable to provide adequate identification, the casino shall place the winnings in safekeeping until adequate identification is provided.

**§ 5 Circumvention of CTR Requirements and Suspicious Activity**

- 5.01 A Suspicious Activity Report (SAR) shall be prepared for any transaction(s) or attempted transaction(s) if it is conducted or attempted by, at, or through a casino and involves or aggregates at least \$5,000 in funds or other assets and the casino knows, suspects or has reason to suspect that the transaction or series of transactions involves funds derived from illegal activity or are being structured to avoid federal transaction reporting requirements. If the transaction or series of transactions also result in an aggregate cash-in or cash-out of more than \$10,000 a CTR must also be prepared and filed.
- 5.02 The SAR shall be filed within 30 days after the casino becomes aware of the suspicious transaction. If the casino is unable to identify the suspect on the date the transaction is initially detected, the casino has an additional 30 days to identify the suspect before filing the SAR, but the suspicious transaction must be reported within 60 calendar days after the date of the initial detection of the suspicious transaction, whether or not the casino is able to identify the suspect. At the time of submission an electronic copy of each SAR shall be submitted to the MGC Boat Sergeant.
- 5.03 Employees are responsible for preventing a patron from circumventing the CTR reporting requirements if the employee has knowledge, or through reasonable diligence in performing their duties should have knowledge, of the patron's attempt. Employees shall not provide any information to anyone to assist in the circumvention of CTR reporting requirements.
- 5.04 If a patron requests currency and upon being informed of the CTR reporting requirements, requests a check or a portion of the transaction being both check and currency, or pulls back chips so there is less than \$10,000 cash involved, the transaction shall be handled as a suspicious transaction and all appropriate procedures shall be followed.
- 5.05 If a patron refuses to provide any identification, all currency transactions shall be terminated and the patron shall be barred from any further gaming activity until all the necessary information has been properly provided. Surveillance and Security shall be notified. A picture of the patron shall be taken by Surveillance, and Surveillance shall monitor and record Security escorting the patron from the gaming area. The patron shall not be allowed to return until all necessary information has been provided. The MGC agent on duty shall be notified immediately that a patron refused to give the required information, or is attempting to circumvent the reporting requirements and is being escorted from the gaming area. A copy of the recording and picture of the patron shall be supplied to the MGC agent on duty.

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