



# Suspicious Activity Report (Internet Gaming)

To: The Supervisory Authority  
ONDCP Headquarters  
Camp Blizzard, Antigua

Form Revised — 17 August 2009

## COMPLETE ENTIRE REPORT (see Instructions)

Please complete this form using the computer keyboard to type responses and a mouse to select appropriate answer boxes. A hard copy should be printed and submitted unless electronic submission has been authorised by the Supervisory Authority.

Instructions on how to prepare a suspicious activity report are enclosed with the form or can be obtained from the ONDCP.

## CONFIDENTIAL

This Report is a confidential document and must be treated accordingly.

Reporting to the Supervisory Authority fraudulent or suspicious transactions which may involve money laundering or an activity similar to money laundering is required of Internet Gambling Companies by Regulation 223 of the Interactive Gaming and Interactive Wagering Regulations 2007 (IGIWR). Also, as financial institutions listed in the First Schedule to the Money Laundering (Prevention) Act 1996 (as amended) ("MLPA"), Internet Gambling Companies are required by Section 13 of the MLPA to report to the Supervisory Authority suspicious financial transactions and activities that constitute or could be related to money laundering. Such reports should be made using the form (Form 1A) or its electronic version (Form 1A-e).

Tipping off: Financial institutions (including employees, staff, directors, owners or other authorized representatives) shall not notify another person that this SAR has been filed and information relating thereto requested by or furnished to the Supervisory Authority so as to prejudice the investigation.

Criminal offence is committed contrary to sections 13(5) and 7(1) and 7(2) of the MLPA for failure to comply with this obligation.

Submit the completed form to:

THE SUPERVISORY AUTHORITY  
ONDCP Headquarters, P.O. Box W 827, Camp Blizzard, Antigua  
Tel: (268) 562-3255 Fax: (268) 460-8818

### Privacy Statement

The provisions of Section 13 of the MLPA and Regulations 223 of the IGIWR are designed to help detect money laundering and uncover the proceeds of crime. Information reported to the Supervisory Authority at the ONDCP is kept confidential. However, the Supervisory Authority is legally authorised to share the information with another law enforcement authority where the disclosure is essential to the detection, investigation or prosecution of an offence. As financial institutions, Gaming Companies and their employees are required by Regulation 223 to file suspicious activity reports and authorised by Regulation 158(c) of the IGIWR to disclose information required to enforce the Regulations, and are protected by Section 13(4) of the MLPA from criminal, civil or administrative liability for complying with the legal requirement to file reports of transactions that constitute or could be related to money laundering.

Penalties exist for failure to supply full and correct information as required.

For assistance please call the Manager of the Financial Intelligence Unit of the ONDCP at (268) 562-3255

### Important Note

Reporting is required to be done promptly. Under Regulation 223 of the IGIWR reports of suspicious transactions or activities that may involve money laundering must be made within 24 hours or as soon as practicable after the activity being reported.

Please note the time when the suspicious transaction/activity or payment occurred and the time when you start to complete this form. You may be asked how long you took to

**1** Check the box if this report is made to correct or update a prior report. Where a correction is being filed, the entire form must be completed again and changes indicated in Part D.

## PART A - IDENTITY OF SUBJECT(S) CONDUCTING THE SUSPICIOUS ACTIVITY OR TRANSACTION

**2** Subject information unavailable

**3** Multiple subjects involved

## SUBJECT INFORMATION

- 4** Name of individual (or entity)—
- (a) Surname (or name of entity):
- (b) First name:
- (c) Middle name:
- (d) alias (if any):
- (e) trading as:

**5** Address (should not be a P.O. Box)

- (a) Street:
- (b) City:
- (c) State/province:
- (d) Postcode:
- (e) Country:

**6** Date of birth: (dd/mmm/yyyy)

**7** Country of registration:

**8** Occupation/Type of business:

**9** 1) Form of customer identity verification No.

Authority that issued document

2) Form of customer identity verification No.

Authority that issued document

**10** Player account number (if any)

**11** Subject's relationship to the reporting financial institution

- (a) Customer/Player (g) Employee  
(b) Accountant (h) Officer  
(c) Agent (i) Shareholder  
(d) Appraiser (j) Other  
(e) Attorney  
(f) Director

**12** Is the subject working with or for the reporting institution?

- (a) Yes  
No

The Subject is  
(b) still employed  
(c) suspended  
(d) terminated  
(e) resigned

13 Date of suspension, termination or resignation:  
(dd/mmm/yyyy)

**PART B - DETAILS OF THE TRANSACTION OR ACTIVITY**

14 Date or date range of suspicious transaction(s) or activity  
From (dd/mmm/yyyy) to (dd/mmm/yyyy)

15a Type of gaming/wagering activity (game, sports event etc.) involved:  
and/or

15b Type of transaction involved (eg. deposit, wager, payment etc.):

16 URL of website involved (if any)

17 Currency and the amount involved in transaction(s). If more than one currency is involved list each currency and its amount. (For conversion rates check )

Currency	Amount	conversion rate to USD	Common currency abbreviations: USD: U.S. dollar GBP: U.K. pound CAD: Canadian dollar EUR: Euro
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18 Total value of transaction(s) in U.S. Dollars

**U S**

19 Type and quantity of instrument(s) involved

Type	Quantity
(1)	
(2)	
(3)	

20 Transaction number(s)

21 Accounts affected

- (1) Account number:
- (2) Account number:
- (3) Account number:

22 If account(s) were closed, date closed

- (1) date
- (2) date
- (3) date
- (4) date

**PART C - SUMMARY CHARACTERIZATION OF SUSPICIOUS ACTIVITY**

23 Category of Suspicious Activity. Check the box(es) which best identifies the suspicious activity that constitutes or could be related to money laundering: (If needed, a numbered list of typologies is attached to the end of the instructions for preparing this form.)

- (a) Structuring
  - (b) Layering
  - (c) Money laundering
  - (d) Cheque Fraud
  - (e) Computer Intrusion
  - (f) Counterfeit Cheque
  - (g) Counterfeit Instrument
  - (h) Credit Card Fraud
  - (i) Debit Card Fraud
  - (j) Embezzlement
  - (k) Identity Theft
  - (l) Mysterious Disappearance
  - (m) Refusal/failure to complete CDD requirements
  - (n) Refusal/failure to update CDD information
  - (o) Terrorist Financing
  - (p) Wire Transfer Fraud
  - (q) The suspicious activity resembles typolog(ies)
- No.
- (r) Other

24 Character of financial transaction(s)

- (a) unusual transaction
- (b) complex transaction
- (c) large transaction
- (d) unusual pattern of transactions with no apparent economic purpose
- (e) insignificant but periodic transactions with no apparent economic purpose
- (f) unusual use of monetary instrument
- (g) other:

## PART D - DESCRIPTION AND EXPLANATION OF SUSPICIOUS TRANSACTION /ACTIVITY

### 25\* Give the reasons why you consider the transaction(s) or activity reported in Parts B and C to be suspicious. (If there is insufficient space, continue the narrative on a separate sheet of paper.)

This section of the report is **critical**. The care with which it is written may make the difference in whether the described conduct and its possible criminal nature are clearly understood. Provide below a chronological and complete account of the activity, including what is unusual, irregular or suspicious about the transaction, using the following checklist as you prepare your account.

- a. **Describe** the conduct that raised suspicion, why it was suspicious and the date(s) it occurred.
- b. **Indicate** any account number(s) that may be involved or affected.
- c. **Explain** whether the transaction(s) was completed or only attempted.
- d. **Describe** supporting documentation (e.g., transaction records, new account information, correspondence.) **Retain the originals.**
- e. **Explain** who benefited, financially or otherwise, from the transaction, how much, and how.
- f. **Retain** any admission or explanation of the transaction provided by the suspect or any other person and indicate to whom and when it was given.
- g. **Retain** any evidence of an attempt to deceive the financial institution as to the actual nature of the transaction or amount of the transaction the subject sought to carry out.
- h. **Indicate** where a possible violation of law took place, if possible.
- i. **Indicate** whether the activity is an isolated incident or relates to another transaction(s).
- j. **Indicate** whether currency and/or monetary instruments were involved. If so, provide the amount and/or description of the instrument (for example, bank draft, money order, wire transfer sent or received, cash, etc.) and country of origin.
- k. **Describe** any funds transfers, including any in or out identification numbers, parties involved, dates, amounts, and financial institutions involved.
- l. **Indicate** for a foreign national any available information on subject's passport(s), and/or identification documents(s). Include date, country, and city of issue, issuing authority, and nationality.
- m. **Describe** subject(s) position if employed by or affiliated with reporting the financial institution.
- n. **Indicate** if a law enforcement agency other than the ONDCP has been contacted, list the name of the agency and the name of any person contacted, their title, their telephone number, and when they were contacted.
- o. **Recommend** any further action that you consider might assist law enforcement authorities
- p. **Indicate** whether any information has been excluded from this report; if so, state reasons.
- q. **If correcting or amending** a prior report, complete the form in its entirety and point out the items that contain the changes .
- r. **If updating** a prior report provide the date of the original SAR regarding the activity.

**Take Note:** SARs are confidential and must be handled accordingly.

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26 Is additional information attached to this report?

**No**    **Yes**    If yes, please specify:

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**PART E - DETAILS OF REPORTING COMPANY**

**27(a)** Name of Licence Holder (company filing report)

**27(b)** Trade name of company (where relevant)

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**28** Address of Licence Holder

Street:

City:

State/province:

Postcode:

Country:

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**29** Address of office issuing the report

Street:

City:

State/province:

Postcode:

Country:

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**30** Physical address of office/facility from which the transaction or activity was processed or detected (if different from 27 above)

Street:

City:

State/province:

Postcode:

Country:

**31** Details of Money Laundering Compliance Officer or authorised person submitting the report

Name:

Position:

Office Address:

Street:

City:

State/province:

Postcode:

Country:

Telephone:

Fax:

email:

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**PART F - STATEMENT OF THE LICENCE HOLDER**

**32** This report is made by or on behalf of the Licence Holder named in 27(a) above pursuant to the requirement to report fraudulent or suspicious transactions that may involve money laundering under Regulation 223 of the IGIWR and Section 13 of the MLPA, and is based on the grounds set out in Part D.

**I declare the information contained in this report to be correct to the best of my knowledge, information and belief.**

Date (dd/mmm/yyyy)

**SIGN  
HERE**

Signature of Compliance Officer or authorised person

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**OFFICIAL USE ONLY**

**Report number**

**Analyst**

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**Comments**