

LIST OF INDICATORS FOR RECOGNITION OF PERSONS AND TRANSACTIONS FOR
WHICH THERE ARE GROUNDS OF SUSPICION OF MONEY LAUNDERING OR
FINANCING OF TERRORISM AT ORGANIZERS OF THE GAMES OF CHANCE
THROUGH MEANS OF ELECTRONIC COMMUNICATION

1. Customer accesses from an IP address (Internet Protocol address) from a country and/or region that is on the list of countries that have strategic deficiencies in the system for combating money laundering and financing of terrorism.
2. Customer is a citizen of a country that does not comply with the standards for preventing money laundering and financing of terrorism.
3. Obliged entity has knowledge that the customer is trying to hide the IP address.
4. Obliged entity has knowledge that the customer was punished for criminal acts.
5. Customer is a politically exposed person, i.e. an official of another state, an official of an international organization or an official of the Republic of Serbia.
6. Customer owns cards that were issued in offshore destinations or countries that are on the list of countries that have strategic deficiencies in the system for combating money laundering and financing of terrorism.
7. Customer requests that the realized profit be transferred to another account, or to the account of a third party.
8. In the event of a big winning, the customer avoids to confirm the identity.
9. The customer has multiple accounts, or "online wallets" on which the individual amounts of deposits and/or withdrawals do not exceed the reporting amounts under the Law on the Prevention of Money Laundering.
10. The customer has more than three payment cards from different financial institutions and uses them alternately when participating in games of chance.
11. Bank accounts/payment cards details do not match registered customer details (identity fraud/identity theft).
12. Customer uses prepaid cards to participate in the games of chance.
13. The customer often deposits cash to top up their record account for the purpose of participating in games of chance through electronic means of communication.
14. Customer deposits a relatively large amount of money into his account and after a certain period withdraws it, without any activities, or after very little participation in the games of chance.
15. The customer regularly invests large amounts of money in games of chance, with the lowest acceptable level of loss, with frequent use of the "cashout" option.
16. Customer invests little, but often, in the games of chance, but his annual total spending is large and far exceeds his annual income.
17. Different customers are connected to the same bank accounts, which they use, withdraw funds, or deposit their winnings in the games of chance (current account authorizations).
18. Customer can be connected to previously recorded registration orders.
19. Customer linked by the media to terrorism/terrorist financing, terrorist organizations or terrorist activities.
20. Suspicion that the person is marked on „black list“ or that the person is on the international list of marked persons or that the person is related to the persons that are on the said lists.

21. There is a previously issued order for the customer by the Administration for the Prevention of Money Laundering for the monitoring of transaction carried out with obliged entities.
22. Customers breaks up large amounts of deposits into smaller transactions.
23. Trasactions for which the obliged entity's employees on the basis of their experience, knowledge and information, estimated that they were not in accordance with the usual activities of the customer.
24. Customer knows very well the rules on reporting suspicious transactions.
25. Information provided by the customer contains numerous inconsistencies (for example, the e-mail domain or telephone number does not match the country).
26. In case of cash transactions, the customer brings in large sums of uncounted money, and after counting, reduces the transaction to an amount that is slightly below the limit for which there is a legal obligation to report.
27. When making cash transactions to top up his registered account for the purpose of participating in the games of chance through means of electronic communication, the customer brings in large sums of uncounted money in worn and damaged banknotes.
28. When paying cash to top up their account, the customer makes payments at various locations, deposits funds into the account and selects games with very low chances of loss, after which the winnings are transferred to the current account.
29. Fast and frequent transactions that allow for a large number of deposits and withdrawals in a short period of time.
30. Two or more customers participate in games of chance at the same time from the same IP addresses.
31. The customer refuses to provide proof of the origin of the assets and, after being requested to do so, withdraws funds from its user account.
32. The customer pays cash amounts that do not exceed 10,000 euros per month over several months.
33. The customer frequently attempts to change user account information (email, payment card information).
34. The customer deposits money into its record account using various payment channels (kiosk, voucher, betting shop, etc.)

Director

Zoran Gašić (*signed*)

Republic of Serbia
Ministry of Finance
Games of Chance Administration
(*round seal*)