

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 SPECIAL GAMES OF CHANCE IN GAMING VENUES

1. For the purposes of identification, the customer submits documents for review and there are grounds for suspecting that they are falsified, altered or incorrect.
2. Customer submits for review only a copy of the documents for personal identification.
3. Customer protests, upon request by the authorized person in the gaming venue, to provide a personal identification document for review, or there are grounds for suspicion that the person is providing false information.
4. Documents submitted by the customer for identification purposes were issued abroad and there are reasons why it is not possible to verify their authenticity.
5. Customer has permanent or temporary residence in 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.
6. 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.
7. Customer appears in the company of suspicious persons or is known to have been punished for criminal acts.
8. Several customers buy chips for cash (the transaction is for a slightly lower amount than the amount reported under the Law on the Prevention of Money Laundering and Financing of Terrorism), and then gamble with minimal amounts.
9. Customer asks the person employed in the gaming venue to monitor his game and to warn him when his winnings approach the amount of the transaction which is subject to reporting to the Administration for the Prevention of Money Laundering under the Law on the Prevention of Money Laundering and Financing of Terrorism.
10. Customer, who is a big winner, asks for the support and favour of another customer in the gaming venue, in order to collect some tokens and thus avoid reporting transactions under the Law on the Prevention of Money Laundering and Financing of Terrorism.
11. Customer buys large amounts of chips for cash at the table, gambles on minimal amounts, and then quickly goes to the counter to cash in the chips.
12. The customer purchases large quantities of chips for cash without participating in the games, followed by a pay-out, or the customer leaves the casino after purchasing the chips, without participating in the games of chance.
13. Customer tries to influence the employee of the gaming venue in some way and thus to avoid to report the transaction under the Law on the Prevention of Money Laundering and Financing of Terrorism by requesting that the refund of the cash for tokens or records of his cash transaction be kept under the name of another person.
14. Players cover both sides of the same game by betting the same amounts frequently and simultaneously (for example, by betting both black and red, or even and odd in roulette or betting both for and against the bank in baccarat)
15. Customer buys chips for cash, invests in a game with a low chance of losing money (e.g. invests simultaneously on red and black on roulette), or engages in minimal gambling or does not gamble at all, and later goes to the cashier to cash in the chips by demanding denominations that are higher than the denominations with which he purchased the tokens.

16. Customer requires a certificate of winnings, which does not have to be issued in gaming venues.
17. Customer uses prepaid cards to participate in the games of chance.
18. The customer uses a mobile wallet (e.g. Apple Pay, Google Pay, etc.) to purchase chips in a way that conceals the origin of the funds or involves multiple primary or third-party cards.
19. Suspicion that the funds originate from risky activities (cryptocurrency, real estate, activities with a large volume of cash).
20. Regular customer changes the way of participating in the games of chance or invests unusually high sums of money in them.
21. Regular customer begins to spend significantly smaller amounts of money, but participates more often in the games of chance.
22. Random customer invests large sums of money in the games of chance.
23. Customer buys a large amount of chips with cash, participates in limited chip games with the intention of creating the perception of significant gambling, and then cashes in chips for large denominations and requests certificate of winnings.
24. Customers linked by the media to terrorism/terrorist financing, terrorist organizations or terrorist activities.
25. 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 connected with the persons that are on the lists.
26. There is a previously issued order for the customer by the Administration for the Prevention of Money Laundering for the monitoring of transactions carried out with obliged entity.
27. Suspicion that the client is making transactions on the instructions of other person, with whom he usually appears.
28. Transactions for which the employees, based on their experience, knowledge and information, estimated that they were not in accordance with the usual activities of the customer.
29. Customer knows very well the rules on reporting suspicious transactions.
30. Customer has accounts with more than three different financial institutions in the same area.
31. Customer unexpectedly shows great interest in the organizer's organizational structure, as well as in internal controls in the field of preventing money laundering and financing of terrorism.
32. Customer tries to establish or maintain friendly relations with the employees of the gaming venue.
33. 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.
34. In case of cash transactions, the customer brings in large sums of uncounted money in worn and damaged banknotes.

Director

Zoran Gašić (*signed*)

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