

# Casino Bulletin

## Policy Amendment – Anti-Money Laundering (AML)

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**MAY 31, 2021**

This bulletin is to advise casino facility licensees and registered gaming workers of **IMPORTANT AMENDMENTS** to the Casino Terms & Conditions and Operating Guidelines (CTCOG).

The following CTCOG policies are effective June 1, 2021.

- Various portions of Section 18 Anti-Money Laundering (AML) in the CTCOG have been amended to align with new FINTRAC guidance regarding record keeping requirements for casinos that comes into effect June 1, 2021.
- The attached Summary of Policy Amendments provides an overview of the AML policy changes.

Please familiarize yourself with the amended policies, update your CTCOG as required, and ensure all affected staff are notified of the new requirement(s).

The amended CTCOG may be accessed on AGLC's website at [aglc.ca](http://aglc.ca).

**If you have any questions or concerns, please contact AGLC's Anti-Money Laundering Unit or call AGLC Hotline at 1-800-561-4415.**

**CASINO TERMS & CONDITIONS AND OPERATING GUIDELINES (CTCOG)**

**SUMMARY OF POLICY AMENDMENTS**

**EFFECTIVE – JUNE 1, 2021**

<b>SECTION</b>	<b>SUBSECTION</b>	<b>AMENDMENT</b>
18.1 AML Definitions	18.1.1	<ul style="list-style-type: none"> <li>The following definitions were either amended or added to this subsection to support new FINTRAC record keeping requirements for casinos:                             <ul style="list-style-type: none"> <li>e) AML person of interest;</li> <li>h) As soon as practicable;</li> <li>o) Funds;</li> <li>r) PTR (Patron Transaction Report);</li> <li>v) Reasonable measures;</li> <li>w) ROFT (Receipt of funds transaction); and</li> <li>z) Third party.</li> </ul> </li> </ul>
18.4 Facility Requirements	18.4.1	<ul style="list-style-type: none"> <li>Casino facility licensee report submission requirements were amended to include ROFT (Receipt of funds transaction).</li> </ul>
	18.4.4	<ul style="list-style-type: none"> <li>Subsection was amended to clarify current AGLC regulatory and operational requirements.</li> </ul>
	18.4.5	<ul style="list-style-type: none"> <li>Subsection was amended to include receipt of funds transactions as a PTR recording requirement.</li> </ul>
	18.4.7	<ul style="list-style-type: none"> <li>Subsection deleted to reflect current operational practices and reduce regulatory red tape.</li> </ul>
	18.4.8	<ul style="list-style-type: none"> <li>Subsection was amended to include casino chips as part of these requirements.</li> </ul>
	18.4.15	<ul style="list-style-type: none"> <li>Subsection was amended to support new FINTRAC record keeping requirements for casinos.</li> </ul>
	18.4.18	<ul style="list-style-type: none"> <li>Subsection was amended to clarify current AGLC regulatory and operational requirements.</li> </ul>
	18.4.19	<ul style="list-style-type: none"> <li>Subsection was amended to clarify current AGLC regulatory and operational requirements.</li> </ul>
18.5 AML Training & Certification	18.5.3	<ul style="list-style-type: none"> <li>Subsection was deleted as requirement does not need to be in the CTCOG.</li> </ul>
18.7 Receipt of Funds Transaction	18.7.1 – 18.7.5	<ul style="list-style-type: none"> <li>This section has been added to support new FINTRAC record keeping requirements for casinos regarding the receipt, tracking, recording and reporting of patron funds (cash, cheque or negotiable instrument) of \$3,000 or more.</li> </ul>
18.8 Large Cash Transaction	18.8.3	<ul style="list-style-type: none"> <li>Subsection was amended to support new FINTRAC record keeping requirements for casinos.</li> </ul>
	18.8.6	<ul style="list-style-type: none"> <li>Subsection was added to clarify the collection of additional patron personal information for PTRs (LCT) as required for the new FINTRAC record keeping requirements for casinos.</li> </ul>
18.9 Casino Disbursements	18.9.6	<ul style="list-style-type: none"> <li>Subsection was amended to clarify the collection of additional patron personal information for PTRs (CD) as required for the new FINTRAC record keeping requirements for casinos.</li> </ul>

SECTION	SUBSECTION	AMENDMENT
18.10 Foreign Currency Exchange	18.10.3	<ul style="list-style-type: none"> <li>Subsection was amended to clarify current AGLC regulatory and operational requirements.</li> </ul>
18.11 Unusual Transactions	18.11.2	<ul style="list-style-type: none"> <li>Subsection was amended to support new FINTRAC record keeping requirements for casinos.</li> </ul>
	18.11.4 f)	<ul style="list-style-type: none"> <li>Subsection deleted to reflect current operational practices and reduce regulatory red tape.</li> </ul>
18.12 Third Party Transactions	18.12.1	<ul style="list-style-type: none"> <li>Subsection was amended to clarify current AGLC regulatory and operational requirements.</li> </ul>