

**Money Laundering **RISK** factors  
for  
Private Members' Clubs**

Private Members' Clubs (PMCs) should consider the following risk factors when entering a business relationship:

- A customer who provides a false or altered ID.
- A customer who forges signatures or uses counterfeit cheques to obtain chips or currency.
- Transactions that are unusual for a specific player or type of player.
- A customer who buys chips and engages in minimal gaming activity without reasonable explanation.
- Customers who try to operate just below threshold level.
- A customer who tries to conspire with an employee.
- A customer who appears to use a casino account primarily as a temporary repository for funds.
- A customer who feeds a slot machine (i.e. electronic roulette) with cash and with minimal or no gaming activity presses the 'cash out' button.
- A pair of customers frequently covering both sides of a bet.

This list is not exhaustive and businesses should remain vigilant to any suspicious behaviour.

**Be alert to suspicious customer behaviour!**

Should you notice anything suspicious which could relate to money laundering you are obligated to make a STR to An Garda Síochana and to the Revenue Commissioners. You do not need proof to make a STR and you should note that it is an offence to 'tip off' the customer that you are making the report.