



April 2015

Prevention of Money Laundering

We are required by the Gambling Commission to be vigilant and look out for people who may wish to 'launder' money – that is to play money that has been gained illegally or not declared to the tax authorities through a machine.

By playing this money they believe that 'winnings' are then classed as 'clean' money – This is NOT the case.

Policy

If you have reason to believe that a customer may be taking part in money laundering activities or suspicious spending

YOU are OBLIGED to bring it to the attention of **Les – he is our nominated MLO – Money laundering Officer**

He, in turn, is obliged to advise the police Authorities.

All staff must be aware of their duties under anti-money laundering legislation to report all suspicious activity to the nominated officer in a timely manner or, where there is no such nominated officer, directly and promptly to the police. It is the nominated officer's duty to consider such reports and to forward them where appropriate to the Serious Organised Crime Agency

In the event that Reohorn Automatics and Amusements Limited or its staff encounter circumstances where known or suspected criminal monies are being played through the company's gaming machine assets, then the company will take awareness of guidance set out in the Commission's Advice Document, "POCA 2002 – Information for small businesses" to inform a proportionate response".

Equally dyed notes may present in a machine and the end user publican may have information regarding the offender .

Procedure

- 1 Record the date/ time and person you suspect of money laundering activity
- 2 Report to The MLO – Les, you may do this directly by speaking to Les, or by TEXT on 07970921685 or writing to him. Such reports may remain anonymous.

Les Reohorn
Reohorn Amusements
5 East Estate
Withybush Park
Haverfordwest

- 3 The MLO aims to acknowledge your record within 5 working days of receipt. We aim to investigate within 10 days.
- 4 If, after investigation, it is appropriate, the matter will be reported to Serious Organised Crime Agency.
- 5 Reporting our suspicions may be used by Reohorn Amusements as a DEFENCE should any future prosecution involve our premises.

What's Suspicious Activity?

Examples:

- A man convicted of dealing in drugs is released from prison and immediately starts gambling large amounts of money. He is known to be out of work and other customers inform employees that he is supplying drugs again. This will give rise to the suspicion that he is spending the gains.

Stakes wagered by a customer become unusually high and the customer is believed to be spending beyond his or her known means. This requires some knowledge of the customer but, nevertheless, there may be circumstances that appear very unusual and raise the suspicion that he or she is using money obtained unlawfully.

It may be that the customer lives in low cost accommodation with no known source of income but nonetheless is spending money well above his or her apparent means.

There is no set amount which dictates when a disclosure should be made and much will depend on what is known or suspected about the customer.

A customer exhibits unusual gambling patterns with an almost guaranteed return or very little financial risk. It is accepted that some customers prefer to gamble in this way but, in some instances, the actions may raise suspicion because they are different from the customer's normal gambling practices.

Money is change by a customer without being used for gambling. For instance, suspicions should be raised by any large amounts deposited in gaming machines or gambling accounts that are then cashed or withdrawn after very little game play or gambling.

A customer regularly gambles large amounts of money and appears to find an unusual level of losses acceptable. In this instance, the customer may be spending the proceeds of crime and sees the losses as an acceptable consequence of the process of laundering the proceeds of crime.

Another case is that of a grandmother with no known gambling history, on a state pension, who began to make weekly bets of about £100. Investigations later revealed that the grandmother was placing the bets on behalf of her grandson, a known criminal, and that the money spent was the proceeds of his criminal activity.

In order to detect customer activity that may be suspicious, it is necessary to monitor transactions or activity.