## FINCEN Form 103

(Formerly Form 8362) (Rev. March 2003)

(Rev. March 2003)

Department of the Treasury
FINCEN

### **Currency Transaction Report by Casinos**

▶ Previous editions will not be accepted after September 30, 2003.

► Please type or print.

(Complete all applicable parts--See Instructions)



1 If this Form 103 (CTRC) is submitted to amend a prior report check here: 

and attach a copy of the original CTRC to this form. Part I Person(s) Involved in Transaction(s) Section A--Person(s) on Whose Behalf Transaction(s) Is Conducted (Customer) 2 Multiple persons 3 Individual's last name or Organization's name 4 First name 5 M I 6 Permanent address (number, street, and apt. or suite no.) 7 SSN or EIN 8 City 9 State 10 ZIP code 11 Country (if not U.S.) 12 Date of birth DD 13 Method used to verify identify: a 🔲 Examined identification credential/document b 🖂 Known Customer - information on file c 🗌 Organization 14 Describe identification credential: a Driver's license/State ID b Passport c Alien registration d Dother e Issued by: f Number: 15 Customer's Account Number 16 Multiple agents Section B--Individual(s) Conducting Transaction(s) - If other than above (Agent) 17 Individual's last name 18 First name 19 M.I. 20 Address (number, street, and apt. or suite no.) 23 State 25 Country (if not U.S.) 26 Date of birth 27 Method used to verify identify: a 

Examined identification credential/document 28 Describe identification credential: a Driver's license/State ID b Passport c Alien registration d Other f Number: Amount and Type of Transaction(s). Complete all items that apply. 29. 

Multiple transactions 31 CASH OUT: (in U.S. dollar equivalent) 30 CASH IN: (in U.S. dollar equivalent) a Redemption(s) of casino chips, tokens, and a Purchase(s) of casino chips, tokens, and . 00 . 00 other gaming instruments other gaming instruments . 00 . 00 b Withdrawal(s) of deposit (front money of safekeeping) **b** Deposit(s) (front money or safekeeping) c Payments(s) on credit (including markers) . 00 c Advance(s) on credit (including markers) . 00 **d** Payment(s) on wager(s), including slot jackpot(s) . 00 d Currency wager(s) .00 e Currency received from wire transfer(s) out . 00 e Currency paid from wire transfer(s) in . 00 f Negotiable instrument(s) cashed (including checks) f Purchase(s) of casino check(s) . 00 . 00 g Currency exchange(s) g Currency exchange(s) . 00 . 00 h Travel and complimentary expenses and . 00 h Other (specify): . 00 gaming incentives .00 Payment for tournament, contest or other promotions Other (specify): . 00 i Enter total of CASH IN transaction(s) . 00 **K** Enter total of CASH OUT transaction(s) 32 Date of transaction 33 Foreign currency used: (see instructions) Part III **Casino Reporting Transactions** 34 Casino's trade name 35 Casino's legal name 36 Employer identification number (EIN) 37 Address (number, street, and apt. or suite no.) where transaction occurred 39 State 40 ZIP code 38 City 41 Title of approving official 42 Signature of approving official 43 Date of signature Sign DD YYYYмм **44** Type or print preparer's name 45 Type or print name of person to contact 46 Contact telephone number Here

			. ago <b>-</b>
Multiple Persons or Multiple Agents			
(Complete applicable parts below if box 2 or box 16 on page 1 is checked.)			
Part I Person(s) Involved in Transaction(s)			
Section APerson(s) on Whose Behalf Transaction(s) Is Conducted (Customer)			
3 Individual's last name or Organization's name	4 First name		5 M.I.
6 Permanent address (number, street, and apt. or suite no.)		7 SSN or EIN	
8 City 9 State 10 ZIP code 1	1 Country (if not U.S.)	12 Date of birth	·
13 Method used to verify identify: a   Examined identification credential/document b   Known Customer - information on file c   Organization			
14 Describe identification credential: a ☐ Driver's license/State ID b ☐ Passport c ☐ Alien registration d ☐ Other			
e Issued by: f Number:			
15 Customer's Account Number			
Section BIndividual(s) Conducting Transaction(s) - If other than above (Agent)			
17 Individual's last name	18 First name		19 M.I.
20 Address (number, street, and apt. or suite no.)		21 SSN	
22 City 23 State 24 ZIP code	25 Country (if not U.S.)	26 Date of birth  M M D D	/ Y Y Y
27 Method used to verify identify: a   Examined identification credential/document b   Known Customer - information on file			
28 Describe identification credential: a ☐ Driver's license/State ID b ☐ Passport c ☐ Alien registration d ☐ Other			
e Issued by: f Number:			

#### **General Instructions**

Form 103. Use this revision of Form 103 (formerly 8362) for filing on reportable transactions. However, the July 1997 version of Form 8362, Currency Transaction Report by Casinos (also referred to as a CTRC), can still be used until September 30, 2003.

Suspicious Transactions. If a transaction is greater than \$10,000 in currency as well as suspicious, casinos must file a Form 103 and must report suspicious transactions and activities on FinCEN Form 102, Suspicious Activity Report by Casinos (SARC). Also, casinos are required to use the SARC form to report suspicious activities involving or aggregating at least \$5,000 in funds. Do not use Form 103 to (a) report suspicious transactions involving \$10,000 or less in currency or (b) indicate that a transaction of more than \$10,000 is suspicious.

When a suspicious activity requires immediate attention, casinos should call 1-800-800-2877, Monday through Friday, from 9:00a.m. to 6:00p.m. Eastern Standard Time (EST). An Internal Revenue Service (IRS) employee will direct the call to the local office of the IRS Criminal Investigation (CI). In an emergency, consult directory assistance for the local IRS CID office.

Who must file. Any organization duly licensed or authorized to do business as a casino, gambling casino, or card club in the United States (except casinos located in Nevada) and having gross annual gaming revenues in excess of \$1 million must file Form 103. This includes the principal headquarters and every domestic branch or place of business of the casino or card club. The requirement includes state-licensed casinos (both land-based and riverboat), tribal casinos, and state-licensed and tribal card clubs. Since card

clubs are subject to the same reporting rules as casinos, the term "casino" as used in these instructions refers to both a casino and a card club

**Note:** Nevada casinos must file Form 103N, Currency Transaction Report by Casinos - Nevada (CTRC-N), to report transactions as required under Nevada Regulation 6A.

What to file. A casino must file Form 103 for each transaction involving either currency received (Cash In) or currency disbursed (Cash Out) of more than \$10,000 in a gaming day. A gaming day is the normal business day of the casino by which it keeps its books and records for business, accounting, and tax purposes. Multiple transactions must be treated as a single transaction if the casino has knowledge that: (a) they are made by or on behalf of the same person, and (b) they result in either Cash In or Cash Out by the casino totaling more than \$10,000 during any one gaming day. Reportable transactions may occur at a casino cage, gaming table, and/or slot machine. The casino should report both Cash In and Cash Out transactions by or on behalf of the same customer on a single Form 103. Do not use Form 103 to report receipts of currency in excess of \$10,000 by nongaming businesses of a casino (e.g., a hotel); instead, use Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business.

**Exceptions.** A casino does not have to report transactions with domestic banks, currency dealers or exchangers, or commercial check cashers.

**Identification requirements.** All individuals (except employees conducting transactions on behalf of armored car services) conducting a reportable transaction(s) for themselves or for another person must be identified by means of an official or otherwise reliable record.

Acceptable forms of identification include a driver's license, military or military dependent identification card, passport, alien registration card, state issued identification card, cedular card (foreign), or a combination of other documents that contain an individual's name and address and preferably a photograph and are normally acceptable by financial institutions as a means of identification when cashing checks for persons other than established customers.

For casino customers granted accounts for credit, deposit, or check cashing, or on whom a CTRC containing verified identity has been filed, acceptable identification information obtained previously and maintained in the casino's internal records may be used as long as the following conditions are met. The customer's identity is re-verified periodically, any out-of-date identifying information is updated in the internal records, and the date of each re-verification is noted on the internal record. For example, if documents verifying an individual's identity were examined and recorded on a signature card when a deposit or credit account was opened, the casino may rely on that information as long as it is re-verified periodically.

When and where to file: File each Form 103 by the 15th calendar day after the day of the transaction with the:

IRS Detroit Computing Center ATTN: CTRC P.O. Box 32621 Detroit, MI 48232

A casino must retain a copy of each Form 103 filed for 5 years from the date of filing.

**Penalties.** Civil and/or criminal penalties may be assessed for failure to file a CTRC or supply information, or for filing a false or fraudulent CTRC. See 31 U.S.C. 5321, 5322, and 5324.

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**Definitions.** For purposes of Form 103, the terms below have the following meanings:

**Agent.** Any individual who conducts a currency transaction on behalf of another individual or organization.

**Currency.** The coin and paper money of the United States or of any other country that is circulated and customarily used and accepted as money.

**Customer.** Any person involved in a currency transaction whether or not that person participates in the casino's gaming activities

**Person.** An individual, corporation, partnership, trust or estate, joint stock company, association, syndicate, joint venture, or any other unincorporated organization or group.

Organization. Person other than an individual.

**Transaction In Currency (Currency Transaction).** The **physical** transfer of currency from one person to another.

**Negotiable Instruments.** All checks and drafts (including business, personal, bank, cashier's, and third-party), traveler's checks, money orders, and promissory notes, whether or not they are in bearer form

### **Specific Instructions**

**Note:** Additional information that cannot fit on the front and back of Form 103 must be submitted on plain paper attached to Form 103. Type or print the individual's or organization's name and identifying number, date of transaction, and casino's name and employer identification number (i.e., Items 3, 4, 5, 7, 32, 34, 35, and 36) as well as identify the specific item number on all additional sheets. This will ensure that if a sheet becomes separated, it will be associated with the appropriate Form 103.

**Item 1. Amends prior report.**—Check Item 1 if this Form 103 amends a previously filed report. Staple a copy of the original report behind the amended one. Complete Part III in its entirety, but complete only those other entries that are being amended.

### Part I. Person(s) Involved in Transaction(s)

Note: Section A must be completed in all cases. If an individual conducts a transaction on his/her own behalf, complete only section A; leave Section B BLANK. If a transaction is conducted by an individual on behalf of another person(s), complete Section A for each person on whose behalf the transaction is conducted; complete Section B for the individual conducting the transaction.

### Section A. Person(s) on Whose Behalf Transaction(s) Is Conducted (Customer)

Item 2. Multiple persons.—Check Item 2 if this transaction is being conducted on behalf of more than one person. For example, if John and Jane Doe cash a check made out to them jointly at the casino, more than one individual has conducted the transaction. Enter information in Section A for one of the individuals; provide information for the other individual on page 2, Section A. Attach additional sheets as necessary.

Items 3, 4, and 5. Individual/Organization name.—
If the person on whose behalf the transaction(s) is conducted is an individual, put his/her last name in Item 3, first name in Item 4 and middle initial in Item 5. If there is no middle initial, leave Item 5 BLANK. If

the transaction is conducted on behalf of an organization, enter the name in Item 3 and leave Items 4 and 5 BLANK, but identify the individual conducting the transaction in Section B. If an organization has a separate "doing business as (DBA)" name, enter in Item 3 the organization's legal name (e.g., Smith Enterprises, Inc.) followed by the name of the business (e.g., DBA Smith Casino Tours). In this case, use Items 4 and 5 if more space is needed.

Items 6, 8, 9, 10, and 11. Address.—Enter the permanent street address, city, two-letter state abbreviation used by the U.S. Postal Service, and ZIP code of the person identified in Item 3. Also, enter in Item 6 the apartment or suite number and road or route number. Do not enter a P.O. box number unless the person has no street address. If the person is from a foreign country, enter any province name as well as the appropriate two-letter country code (e.g., "CA" for Canada, "JA" for Japan, etc.). If the country is the United States, leave Item 11 BLANK.

# Item 7. Social security number (SSN) or Employer identification number (EIN).—

Enter the SSN (if an individual) or EIN (if other than an individual) of the person identified in Items 3 through 5. If that individual is a nonresident alien individual who does not have an SSN, enter "NONE" in this space.

Item 12. Date of birth.—Enter the customer's date of birth (DOB) if it is known to the casino through an existing internal record or reflected on an appropriate identification document or credential presented to the casino to verify the customer's identity (see Identification Requirements above). Internal casino records can include those for casino customers granted accounts for credit, deposit, or check cashing, or on whom a CTRC containing verified identity has been filed. If such records do not indicate the DOB, a casino should ask the customer for the DOB. If the DOB is not available from any of these sources, the casino should enter NOT AVAILABLE in the space. Eight numerals must be inserted for each date. Enter the date in the format "mmddyyyy", where "mm" is the month, "dd" is the day, and "yyyy" is the year. Zero (0) should precede any single-digit number. For example, if the individual's birth date is June 1, 1948, enter "06 01 1948" in Item 12.

Item 13. Method used to verify identity.—If an individual conducts the transaction(s) on his/her own behalf, his/her name and address must be verified by examination of an official credential/document or internal record containing identification information on a known customer (see Identification Requirements above). Check box a if you examined an official identification credential/document. Check box b if you examined an acceptable internal casino record (i.e., credit, deposit, or check cashing account record, or a CTRC worksheet) containing previously verified identification information on a "known customer." Check box c if the transaction is conducted on behalf of an organization. If box a or b is checked, you must complete Item 14. If box c is checked, do not complete Item 14.

Item 14. Describe identification credential.— If a driver's license, passport, or alien registration card was used to verify the individual's identity, check as appropriate box **a**, **b**, or **c**. If you check box **d**, you must specifically identify the type of document used (e.g., enter "military ID" for a military or military/dependent identification card). A statement such as "known customer" in box **d** is **not** sufficient for completion of Form 103. Enter in Item 14e the two-letter state postal code, two-letter country code, or the name of the issuer for that document, and enter in Item 14f the number shown on that official document.

Item 15. Customer account number.—Enter the account number which corresponds to the transaction being reported and which the casino has assigned to the person whose name is entered in Item 3. If the person has more than one account number affected by the transaction, enter the account number that corresponds to the majority of currency being reported.

If the transaction does not involve an account number, enter "NOT APPLICABLE" in the space.

#### Section B. Individual(s) Conducting Transaction(s) – If Other Than Above (Agent)

Complete Section B if an individual conducts a transaction on behalf of another person(s) listed in Section A. If an individual conducts a transaction on his/her own behalf, leave Section B BLANK.

**Item 16. Multiple agents.**—If, during a gaming day, more than one individual conducts transactions on behalf of an individual or organization listed in Section A, check this box and complete Section B. List one of the individuals on the front of the form and the other individual(s) on page 2, Section B. Attach additional sheets as necessary.

Items 17, 18, and 19. Name of individual.— Enter the individual's last name in Item 17, first name in Item 18, and middle initial in Item 19. If there is no middle initial, leave Item 19 BLANK. For example, if John Doe, an employee of the Error Free Rock Band, cashes an \$11,000 check for the band, Error Free Rock Band is identified in Section A, and John Doe is identified in Section B.

Items 20, 22, 23, 24, and 25. Address.— Enter the permanent street address, including ZIP code, of the individual conducting the transaction. If the individual is from a foreign country, enter any province name and the appropriate two-letter country code.

### Item 21. Social security number (SSN).—

Enter the SSN of the individual identified in Items 17 through 19. If that individual is a nonresident alien who does not have an SSN, enter "NONE" in the space

**Item 26. Date of birth.**—Enter the individual's date of birth. For proper format, see the instructions under **Item 12** above.

Item 27. Method used to verify identity.—Any individual listed in Items 17 through 19 must present an official document to verify his/her name and address. See the instructions under Item 13 above for more information. After completing Item 27, you must also complete Item 28.

**Item 28. Describe identification credential.**Describe the identification credential used to verify the individual's name and address. See the instructions under **Item 14** above for more information.

### Part II. Amount and Type of Transaction(s)

Part II identifies the type of transaction(s) reported and the amount(s) involved. You must complete all items that apply.

**Item 29. Multiple transactions.**—Check this box if multiple currency transactions, none of which individually exceeds \$10,000, comprise this report.

Items 30 and 31. Cash in and cash out.— Enter in the appropriate spaces provided in Items 30 and/or 31, the specific currency amount for each "type of transaction" for a reportable Cash In or Cash Out. If the casino engages in a Cash In or a Cash Out transaction that is not listed in Items 30a through 30g

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or Items 31a through 31i, specify the type of transaction and the amount of currency in Item 30h or 31j, respectively. Enter the total amount of the reportable Cash In transaction(s) in Item 30i. Enter the total amount of the reportable Cash Out transaction(s) in Item 31k.

If less than a full dollar amount is involved increase the figure to the next higher dollar. For example, if the currency total is \$20,500.25, show it as \$20,501.00.

If there is a currency exchange, list it separately with both the Cash In and Cash Out totals. If foreign currency is exchanged, use the U.S. dollar equivalent on the day of the transaction.

Payment(s) on credit, Item 30c, includes all forms of cash payments made by a customer on a credit account or line of credit, or in redemption of markers or counter checks. Currency received from wire transfer(s) out, Item 30e, applies to cash received from a customer when the casino sends a wire transfer on behalf of a customer.

Currency paid from wire transfer(s) in, Item 31e, applies to cash paid to a customer when the casino receives a wire transfer on behalf of a customer. Travel and complimentary expenses and gaming incentives, Item 31h, includes reimbursements for a customer's travel and entertainment expenses and cash complementaries ("comps").

# **Determining Whether Transactions Meet The Reporting Threshold**

Only cash transactions that, alone or when aggregated, exceed \$10,000 should be reported on Form 103. A casino must report multiple currency transactions when it has knowledge that such transactions have occurred. This includes knowledge gathered through examination of books, records, logs, information retained on magnetic disk, tape or other machine-readable media, or in any manual system, and similar documents and information that the casino maintains pursuant to any law or regulation or within the ordinary course of its business.

Cash In and Cash Out transactions for the same customer are to be aggregated separately and must not be offset against one another. If there are both Cash In and Cash Out transactions which **each** exceed \$10,000, enter the amounts in Items 30 and 31 and report on a single Form 103.

**Example 1.** Person A purchases \$11,000 in chips with currency (one Cash In entry); and later receives currency from a \$6,000 redemption of chips and a \$2,000 slot jackpot win (two Cash Out entries). Complete Form 103 as follows:

Cash In of "\$11,000" is entered in Item 30a (purchase of chips) and Cash In Total of "\$11,000" is entered in Item 30i. No entry is made for Cash Out. The two Cash Out transactions equal only \$8,000, which does not meet the BSA reporting threshold.

**Example 2.** Person B deposits \$5,000 in currency to his front money account and pays \$10,000 in currency to pay off an outstanding credit balance (two Cash In entries); receives \$7,000 in currency

from a wire transfer (one Cash Out entry); and presents \$2,000 in small denomination U.S. currency to be exchanged for an equal amount in U.S. \$100 bills. Complete Form 103 as follows:

Cash In of "\$5,000" is entered in Item 30b (deposit), "\$10,000" is entered in Item 30c (payment on credit), "\$2,000" is entered in Item 30g (currency exchange), and Cash In Total of "\$17,000" is entered in Item 30i. In determining whether the transactions are reportable, the currency exchange is aggregated with both the Cash In and the Cash Out amounts. The result is a reportable \$17,000 Cash In transaction. No entry is made for Cash Out. The total Cash Out amount only equals \$9,000, which does not meet the BSA reporting threshold.

**Example 3.** Person C deposits \$7,000 in currency to his front money account and pays \$9,000 in currency to pay off an outstanding credit balance (two Cash In entries); receives \$2,500 in currency from a withdrawal from a safekeeping account, \$2,500 in currency from a wire transfer and cashes a personal check of \$7,500 (three Cash Out entries); and presents Canadian dollars which are exchanged for \$1,500 in U.S. dollar equivalent. Complete Form 103 as follows:

Cash In of "\$7,000" is entered in Item 30b (deposit), "\$9,000" is entered in Item 30c (payment on credit), "\$1,500" is entered in Item 30g (currency exchange), and a Cash In total of "\$17,500" is entered in Item 30i. Cash Out of "\$2,500" is entered in Item 31b (withdrawal of deposit), "\$2,500" is entered in Item 31e (wire transfer), "\$7,500" is entered in Item 31f (negotiable instrument cashed), "\$1,500" is entered in Item 31g (currency exchange) and a Cash Out Total of "\$14,000" is entered in Item 31k. In this example, both the Cash In and Cash Out totals exceed \$10,000, and each must be reflected on Form 103.

**Example 4.** Person D purchases \$10,000 in chips with currency and places a \$10,000 cash bet (two Cash In entries); and later receives currency for an \$18,000 redemption of chips and \$20,000 from a payment on a cash bet (two Cash Out entries). Complete Form 103 as follows:

Cash In of "\$10,000" is entered in Items 30a and 30d and a Cash In total of "\$20,000" is entered in Item 30i. Cash Out of "\$18,000" is entered in Item 31a (redemption of chips), "\$20,000" is entered in Item 31d (payment on bets) and a Cash Out Total of "\$38,000" is entered in Item 31k. In this example, both the Cash In and Cash Out totals exceed \$10,000, and each must be reflected on Form 103.

**Item 32. Date of transaction.**—Enter the gaming day on which the transaction occurred (see **What To File** above). For proper format, see the instructions for**Item 12** above.

**Item 33. Foreign currency.**—If foreign currency is involved, identify the country of issuance by entering the appropriate two-letter country code. If multiple foreign currencies are involved, identify the country for which the largest amount in U.S. dollars is exchanged.

Part III. Casino Reporting Transaction(s)

**Item 34. Casino's trade name.**—Enter the name by which the casino does business and is commonly known. Do not enter a corporate, partnership, or other entity name, unless such name is the one by which the casino is commonly known.

Item 35. Casino's legal name.—Enter the legal name as shown on required tax filings, only if different from the trade name shown in Item 34. This name will be defined as the name indicated on a charter or other document creating the entity, and which is identified with the casino's established EIN.

Item 36. Employer identification number (EIN).—
Enter the casino's EIN.

**Items 37, 38, 39, and 40. Address.**—Enter the street address, city, state, and ZIP code of the casino (or branch) where the transaction occurred. **Do not** use a P.O. box number.

#### Items 41 and 42. Title and signature of

approving official.—The official who is authorized to review and approve Form 103 must indicate his/her title and sign the form.

Item 43. Date the form is signed.—The approving official must enter the date the Form 103 is signed. For proper format, see the instructions for Item 12 above. Item 44. Preparer's name.—Type or print the full name of the individual preparing Form 103. The preparer and the approving official may be different individuals.

Items 45 and 46. Contact person/telephone number.—Type or print the name and commercial telephone number of a responsible individual to contact concerning any questions about this Form 103.

Paperwork Reduction Act Notice.—The requested information is useful in criminal, tax, and regulatory investigations and proceedings. Financial institutions are required to provide the information under 31 U.S.C. 5313 and 31 CFR Part 103, commonly referred to as the Bank Secrecy Act (BSA).

The BSA is administered by the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN). You are not required to provide the requested information unless a form displays a valid OMB control number. The time needed to complete this form will vary depending on individual circumstances. The estimated average time is 19 minutes. Send comments regarding this burden estimate, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503 and to the Financial Crimes Enforcement Network, Attn.: Paperwork Reduction Act, P.O. Box 39, Vienna VA 22183-0039.