

Purpose

Project Libby
Casino Typologies Mapping Table**1. Purpose:**

- 1.1 The purpose of this workpaper is to map each money laundering casino typology and its key indicators to data provided by Crown, built progress of the Tableau dashboards and request for additional data from Crown.
- 1.2 The key typology indicators are summarised in the Mapping Table into the following categories:
 - a. **Category 1:** Dashboard built is complete. Further enhancements may be required to the dashboards as we progress our review, but no further data is required from Crown.
 - b. **Category 2:** Data received from Crown but dashboard to specifically address the indicator has not been built. This category is for internal consideration of Deloitte team
 - c. **Category 3:** Data is not available to build the dashboards. To be discussed / requested from Crown
 - d. **Category 4:** Indicator / activity requires deep dive. This category is for internal consideration of Deloitte team

Mapping Table

Project Libby
Casino Typologies Mapping Table

Money Laundering Typology Mapping Table

Typology	Key Indicators by Typology	Category	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request	NF Comment	
Structuring	Cash deposits slightly below the AUSTRAC reporting threshold (\$10,000)	1		Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable	Any definition of 'slightly below' that we want implemented?	
	Cash deposits of smaller amounts within a short timeframe greater than or equal to \$10,000	3		No	Not Built	Not Built	Not applicable	Transaction Timestamp data		
	Multiple cash deposits greater than or equal to the \$10,000 threshold (i.e. in aggregate) on consecutive days	1		Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable		
	Round number deposits (e.g. \$8,500, \$9,000 etc)	1		Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable		
	Cash deposits as described above made at different bank branches and / or ATMs (i.e. to avoid raising suspicion with the bank)	3		No	Not Built	Not Built	Not applicable	Transaction geographic location data	will be covered Ask Crown	
Smurfing	Regular deposits of cash below the threshold value either at a bank branch or ATM	1		Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements	Not applicable		
	The use of third parties to undertake multiple / several smaller transactions	1		Yes	Complete	Top Bank Transactions / Patron card	Transactional data from Bank Statements	Not applicable		
	Multiple deposits made for a common Patron ID which are geographically distant in a timeframe that is not practical to travel	3		No	Not Built	Not Built	Not applicable	Transaction Timestamp data and geographic location data		
	Using cheques from multiple financial institutions or branches of a financial institution to "buy in" while the amount of each cheque is below the reporting threshold	2		Yes	Not Built	Not Built	SYCO Data	Not applicable	Have something currently built out (but not live) for the syco transaction Type 'Draft (Bank Cheque Drawn on Foreign bank)'	
Cuckoo Smurfing	The money is deposited through multiple cash deposits below the \$10,000 threshold	1		Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable		
	The value of the cash deposits, in aggregate, is over the \$10,000 threshold	1		Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable		
	The cash deposits occur within a short period of time	3		No	Not Built	Not Built	Not applicable	Transaction Timestamp data	Most we could do here is limit the structuring time frame to a single day	
	The deposits during the period may have taken place at different locations (bank branches)	3		No	Not Built	Not Built	Not applicable	Transaction geographic location data		
	Large cash deposits by third parties	1		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements	Not applicable		
	Electronic funds transfer by both domestic and international third parties	2		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	consolidated dashboard (Max to action)	
	There is a legitimate need to send money from overseas and deposit it in a foreign country.	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	A money remitter is engaged to send the money overseas and deposit it in a foreign country.	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	The money remitter accepts legitimate money in the foreign country	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	The money remitter arranges for the funds to be made available and they or their counterpart in the receiving country arrange for illicit funds in the foreign country to be used to complete the deposit for the legitimate transaction	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
Refining	The legitimate money is then made available outside the foreign country where the deposit took place to the person in control of the illicit funds before it is deposited.	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	The person with the legitimate reason to send money to a foreign country is unaware that their transaction has been effected using illicit funds.	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	Buying chips / poker machine credits with low denomination notes	3		No	Not Built	Not Built	Not applicable	Poker machine data	likely no connection with use of bank accounts	
	Changing lower denomination notes to higher denomination notes from the Cashier	3 or 4		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	likely no connection with use of bank accounts	
	Use of third parties to undertake several refining transactions	3 or 4		No	Not Built	Not Built	Not applicable	gambling activity data / Deep Dive	likely no connection with use of bank accounts	
	Patron Source of Wealth is not commensurate with patron occupation and / or known net worth	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	does Crown have a list of all their Junket Operators by Patron ID ? Crown's Historical position around recording details of source of wealth / source of funds (speak to Grace / Caroline?)	
	Source of funds for deposits cannot be verified (including gambling winnings)	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable		
	Casino value instruments utilised	Purchasing and cashing out chips without playing	3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
		Purchasing chips and then cashing in nearly the same amount of chips within a short timeframe on multiple days	2		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	Chip purchase activity type from Syco can be used to build this. define timeframes ?
		Putting funds through Poker machines and claiming credits as a jackpot win	3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
Playing games with low returns but higher chances of winning (i.e. Blackjack and Baccarat)		3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data		
Unusual account activity for the individual which does not reflect payroll deposits, purchases or bill payments.		Check for validation							would require a decent amount of work around the occupation and then a deep dive to validate.	
Large cash deposits often followed by large cash withdrawals at casinos.		2		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	quick turnover dashboard and another WIP dashboard relates to this	
Noticeable spending/betting pattern changes		2		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	Would we want to look changes in total deposits over time? An increase of anything above x% in a 6 month time frame for flag?	
Credit card cash advances at casinos followed by cash deposits to the credit card account.		Check for validation							Not sure about credit card cash advances, I'll add to questions. Regardless, can see if it's followed by a deposit, but not if it was put into the credit card account.	
Customer requests to add cash to casino winnings and then exchanging the combined cash and winnings for a single cheque.		3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data		
Multiple cheques being requested or drawn on account.		3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown		
Currency Exchange	High volume of transactions within a short period	1		Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable		
	Multiple chip cash outs on the same day.	1		Yes	Complete	Chip Cashing	Transactional data from Bank Statements & SYCO	Not applicable		
	Structuring of chip/cheque transactions	2		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable		
	Purchasing and cashing out chips without playing	3		No	Not Built	Not Built	Not applicable	gambling activity data		
	Putting funds through slot machines and claiming credits as a jackpot win	3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data		
	Bank drafts/cheques cashed in for foreign currency, e.g. Euros, USD.	2		Yes	Not Built	Not Built	SYCO Data	Not applicable	Have something currently built out (but not live) for the syco transaction Type 'Draft (Bank Cheque Drawn on Foreign bank)', but can also include any cheques in different currency	
	Multiple currency exchanges	2		Yes	Not Built	Not Built	SYCO Data	Not applicable	check if the depositor is a money remitter ?	
	Large cash transaction with unknown source of funds	Check for validation								

Mapping Table

Typology	Key Indicators by Typology	Category	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request
	Transaction with enormous amount and frequent chips purchase incommensurate with subjects' background	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Currency exchange for no reasonable purpose	Check for validation						
	Currency exchanges with low denomination bills for high denomination bills	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Currency exchanges carried out by third parties	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Transactions were conducted on behalf of third parties	1		Yes	Complete	Top Bank Transactions / Patron card	Transactional data from Bank Statements & SYCO	Not applicable
	Large, one-off, or frequent currency exchanges for customers not known to the casino.	3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
	Requests for casino cheques from foreign currency.	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Currency exchanges with little or no gambling activity	3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
	Dramatic or rapid increases in size and frequency of currency exchange transactions for regular account holders.	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Structured currency exchange	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
Credit/Debit Cards	Purchasing casino chips using credit card/debit card.	Check for validation						
	Purchasing and cashing out casino chips/plaques with no gambling activity.	Check for validation						
	Use of multiple credit/debit cards to purchase casino chips.	Check for validation						
	Use of third parties to purchase chips using credit/debit card.	Check for validation						
	Structuring of credit card transactions.	Check for validation						
	Conducting debit card transactions up to the maximum limit.	Check for validation						
	Chip cash out is same/similar to chip purchase.	Check for validation						
	Customer purchases chips and leaves casino shortly after.	Check for validation						
	Use of stolen or fraudulently obtained credit card.	Check for validation						
	Customer due diligence challenges, e.g. refusals, false documents, one-offs, tourists passing trade	Check for validation						
Transactions performed by agents	Agents performed significant amount of cash deposit into front money account on behalf of patron but without reasonable support for the source of funds or purpose for the fund movements.	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Cross border transfer of funds within casinos of same group but in different countries	3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
	Use of representatives/third parties to conduct cash buy-in	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Junket chips redeemed without any gambling activity.	3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown / Gambling activity
	Source of funds for buy-in not disclosed.	3		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Source of funds for buy-in from companies	2		Yes	Not Built	Not Built	SYCO Data	Not applicable
Funds transfers into casino using shell company	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner	1		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	No apparent relationship between the originator and the beneficiary of the fund transfers	1		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Funds mainly used for chips purchase but gambling activities cannot be ascertained	3		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data
	The source of funds is difficult to be traced due to the intentional layering of transactions to hide the ultimate beneficial owners.	1		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner	1		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
Money Laundering via poker machines (in pubs and clubs)	Cheque deposits from Bank from pubs and clubs (incl. poker machines) only	3		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
	No correlation between amounts of cheques deposited and cash withdrawn	1		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable
	No standard monthly business payments	1		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable
	Business has no online or physical presence from which to market the business and attract customers	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Business has been deregistered since initial account opening, yet activity continues on the business bank account	4		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable

MF Comment

Question about identifying debit/credit card transactions added to questions to Crown

I don't think we have data to identify this
I don't think we have data to identify this

dependent on information available from the bank data

Can't see gambling activities, but can highlight instances where the total amount (or most) of deposits are withdrawn as chips

Mapping Table - Master Version

Project Libby
Casino Typologies Mapping Table

Money Laundering Typology Mapping Table

Typology	Key Indicators by Typology	Category	Inscope	Rationale for Out of Scope	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request	Comment
Structuring	Multiple cash deposits on the same day / consecutive days that are individually below the AUSTRAC reporting threshold of \$10,000 but are greater than or equal to the \$10,000 threshold in aggregate	1	Yes			Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable	
	Multiple Cash deposits of smaller amounts within a short timeframe greater than or equal to \$10,000 <i>Note: Timeframe in this key indicator refers to timestamps within a 24hour period</i>	3	Yes			No	Not Built	Not Built	Not applicable	Transaction Timestamp data	
	Round number deposits (e.g. \$8,500, \$9,000 etc)	1	Yes			Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable	
	Cash deposits as described above made at different bank branches and / or ATMs (i.e. to avoid raising suspicion with the bank)	3	Yes			No	Not Built	Not Built	Not applicable	Transaction geographic location data	
Smurfing	The use of third parties to undertake multiple / several deposits as described in the 'Structuring' typology above	1	Yes			Yes	Complete	Top Bank Transactions / Patron card	Transactional data from Bank Statements	Not applicable	MF to build one consolidated dashboard for Smurfing
	Multiple deposits made for a common Patron ID which are geographically distant in a timeframe that is not practical to travel <i>Note: Timeframe in this key indicator refers to timestamps within a 24hour period</i>	3	Yes			No	Not Built	Not Built	Not applicable	Transaction Timestamp data and geographic location data	
	Using cheques from multiple financial institutions or branches of a financial institution to "buy in" while the amount of each cheque is below the reporting threshold	2	No	Typology unrelated to bank accounts activity		Yes	Not Built	Not Built	SYCO Data	Not applicable	
Cuckoo Smurfing	The use of third parties to undertake multiple / several deposits as described in the 'Structuring' and 'Smurfing' typology above	1	Yes			Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements	Not applicable	MF to build one consolidated dashboard for Smurfing
	Electronic funds transfer by both domestic and international third parties	2	Yes			Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	
	There is a legitimate need to send money from overseas and deposit it in a foreign country.	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	A money remitter is engaged to send the money overseas and deposit it in a foreign country.	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	The money remitter accepts legitimate money in the foreign country	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	The money remitter arranges for the funds to be made available and they or their counterpart in the receiving country arrange for illicit funds in the foreign country to be used to complete the deposit for the legitimate transaction	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	The legitimate money is then made available outside the foreign country where the deposit took place to the person in control of the illicit funds before it is deposited.	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	The person with the legitimate reason to send money to a foreign country is unaware that their transaction has been effected using illicit funds.	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
Refining	Buying chips / poker machine credits with low denomination notes	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data	no connection with use of bank accounts
	Changing lower denomination notes to higher denomination notes from the Cashier	3 or 4	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	no connection with use of bank accounts
	Use of third parties to undertake several refining transactions	3 or 4	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	gambling activity data / Deep Dive	no connection with use of bank accounts
Casino accounts & facilities	Patron Source of Wealth is not commensurate with patron occupation and / or known net worth	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	does Crown have a list of all their Junket Operators by Patron ID ? Crown's Historical position around recording details of source of wealth / source of funds (speak to Grace / Caroline?)
	Source of funds for deposits cannot be verified (including gambling winnings)	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
Casino value instruments utilised	Purchasing and cashing out chips without playing	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
	Purchasing chips and then cashing in nearly the same amount of chips within a short timeframe on multiple days	2	Yes			Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	Chip purchase activity type from Syco can be used to build this. define timeframes ?
	Putting funds through Poker machines and claiming credits as a jackpot win	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
	Playing games with low returns but higher chances of winning (i.e Blackjack and Baccarat)	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
	Unusual account activity for the individual which does not reflect payroll deposits, purchases or bill payments.	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Not applicable	would require a decent amount of work around the occupation and then a deep dive to validate.
	Large cash deposits often followed by large cash withdrawals at casinos.	2	Yes			Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	quick turnover dashboard and another WIP dashboard relates to this
	Noticeable spending/betting pattern changes	2	Yes			Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	Would we want to look changes in total deposits over time? An increase of anything above x% in a 6 month time frame for flag?
	Credit card cash advances at casinos followed by cash deposits to the credit card account.	3	No	Not relevant to Crown		Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not sure about credit card cash advances, I'll add to questions. Regardless, can see if it's followed by a deposit, but not if it was put into the credit card account.
	Customer requests to add cash to casino winnings and then exchanging the combined cash and winnings for a single cheque.	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	

Mapping Table - Master Version

Typology	Key Indicators by Typology	Category	Inscope	Rationale for Out of Scope	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request	Comment
	Multiple cheques being requested or drawn on account.	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	
	High volume of transactions within a short period	1	Yes			Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable	
	Multiple chip cash outs on the same day.	1	Yes			Yes	Complete	Chip Cashing	Transactional data from Bank Statements & SYCO	Not applicable	
	Structuring of chip/cheque transactions	2	Yes			Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable	
	Purchasing and cashing out chips without playing	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	gambling activity data	
	Putting funds through slot machines and claiming credits as a jackpot win	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	
Currency Exchange	Bank drafts/cheques cashed in for foreign currency, e.g. Euros, USD.	2	No	Typology unrelated to bank accounts activity		Yes	Not Built	Not Built	SYCO Data	Not applicable	Have something currently built out (but not live) for the syco transaction Type 'Draft (Bank Cheque Drawn on Foreign bank)', but can also include any cheques in different currency
	Multiple currency exchanges	2	Yes			Yes	Not Built	Not Built	SYCO Data	Not applicable	check if the depositor is a money remitter ?
	Large cash transaction with unknown source of funds	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Transaction with enormous amount and frequent chips purchase incommensurate with subjects' background	4	No	Typology unrelated to bank accounts activity		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Currency exchange for no reasonable purpose	4	No	Typology unrelated to bank accounts activity		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Currency exchanges with low denomination bills for high denomination bills	4	No	Typology unrelated to bank accounts activity		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Currency exchanges carried out by third parties	4	Yes - Deep Dive Phase			Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Transactions were conducted on behalf of third parties	1	Yes			Yes	Complete	Top Bank Transactions / Patron card	Transactional data from Bank Statements & SYCO	Not applicable	
	Large, one-off, or frequent currency exchanges for customers not known to the casino.	4	Yes - Deep Dive Phase			No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	
	Requests for casino cheques from foreign currency.	2	No			Yes	Not Built	Not Built	SYCO Data	Not applicable	
	Currency exchanges with little or no gambling activity	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	
	Dramatic or rapid increases in size and frequency of currency exchange transactions for regular account holders.	4	Yes - Deep Dive Phase			Yes	Not Built	Not Built	SYCO Data	Not applicable	
	Structured currency exchange	4	Yes - Deep Dive Phase			Yes	Not Built	Not Built	SYCO Data	Not applicable	
Credit/Debit Cards	Purchasing casino chips using credit card/debit card.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		Question about identifying debit/credit card transactions added to questions to Crown
	Purchasing and cashing out casino chips/plaques with no gambling activity.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Use of multiple credit/debit cards to purchase casino chips.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Use of third parties to purchase chips using credit/debit card.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Structuring of credit card transactions.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Conducting debit card transactions up to the maximum limit.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Chip cash out is same/similar to chip purchase.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Customer purchases chips and leaves casino shortly after.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Use of stolen or fraudulently obtained credit card.	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
	Customer due diligence challenges, e.g. refusals, false documents, one-offs, tourists passing trade	3	No	To be revisited after discussion with Crown on relevance		No	Not Built	Not Built	Not applicable		
Transactions performed by agents	Agents performed significant amount of cash deposit into front money account on behalf of patron but without reasonable support for the source of funds or purpose for the fund movements.	2	Yes			Yes	Not Built	Not Built	SYCO Data	Not applicable	
	Cross border transfer of funds within casinos of same group but in different countries	3	Yes			No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	
	Use of representatives/third parties to conduct cash buy-in	2	No	Typology unrelated to bank accounts activity		Yes	Not Built	Not Built	SYCO Data	Not applicable	
	Junket chips redeemed without any gambling activity.	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown / Gambling activity	
	Source of funds for buy-in not disclosed.	3	Yes			Yes	Not Built	Not Built	SYCO Data	Not applicable	I don't think we have data to identify this
	Source of funds for buy-in from companies	2	No	Typology unrelated to bank accounts activity		Yes	Not Built	Not Built	SYCO Data	Not applicable	I don't think we have data to identify this
Funds transfers into casino using shell company	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner	4	Yes	To be revisited after review of information available from bank statement data		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	dependent on information available from the bank data
	No apparent relationship between the originator and the beneficiary of the fund transfers	4	Yes	To be revisited after review of information available from bank statement data		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Funds mainly used for chips purchase but gambling activities cannot be ascertained	3	Yes	To be revisited after review of information available from bank statement data		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data	Can't see gambling activities, but can highlight instances where the total amount (or most) of deposits are withdrawn as chips
	The source of funds is difficult to be traced due to the intentional layering of transactions to hide the ultimate beneficial owners.	4	Yes	To be revisited after review of information available from bank statement data		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	

Mapping Table - Master Version

Typology	Key Indicators by Typology	Category	Inscope	Rationale for Out of Scope	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request	Comment
	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner	4	Yes	To be revisited after review of information available from bank statement data		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
Money Laundering via poker machines (in pubs and clubs)	Cheque deposits from Bank from pubs and clubs (incl. poker machines) only	3	No	Typology unrelated to bank accounts activity		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown	
	No correlation between amounts of cheques deposited and cash withdrawn	1	No	Typology unrelated to bank accounts activity		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable	
	No standard monthly business payments	1	No	Typology unrelated to bank accounts activity		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable	
	Business has no online or physical presence from which to market the business and attract customers	4	No	Typology unrelated to bank accounts activity		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	
	Business has been deregistered since initial account opening, yet activity continues on the business bank account	4	No	Typology unrelated to bank accounts activity		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable	

Mapping Table - Clean Version

Project Libby
Casino Typologies Mapping Table

Money Laundering Typology Mapping Table

Typology	Key Indicators by Typology	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request
Structuring	Multiple cash deposits on the same day / consecutive days that are individually below the AUSTRAC reporting threshold of \$10,000 but are greater than or equal to the \$10,000 threshold in aggregate		Yes	Complete	Structuring	Transactional data from Bank Statements & SYCO	Not applicable
	Multiple Cash deposits of smaller amounts within a short timeframe greater than or equal to \$10,000 <i>Note: Timeframe in this key indicator refers to timestamps within a 24hour period</i>		No	Not Built	Not Built	Not applicable	Transaction Timestamp data
	Round number deposits (e.g. \$8,500, \$9,000 etc)		Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable
	Cash deposits as described above made at different bank branches and / or ATMs (i.e. to avoid raising suspicion with the bank)		No	Not Built	Not Built	Not applicable	Transaction geographic location data
Smurfing	The use of third parties to undertake multiple / several deposits as described in the 'Structuring' typology above		Yes	Complete	Top Bank Transactions / Patron card	Transactional data from Bank Statements	Not applicable
	Multiple deposits made for a common Patron ID which are geographically distant in a timeframe that is not practical to travel <i>Note: Timeframe in this key indicator refers to timestamps within a 24hour period</i>		No	Not Built	Not Built	Not applicable	Transaction Timestamp data and geographic location data
Cuckoo Smurfing	The use of third parties to undertake multiple / several deposits as described in the 'Structuring' and 'Smurfing' typology above		Yes	Complete	Top Bank Transactions	Transactional data from Bank Statements	Not applicable
	Electronic funds transfer by both domestic and international third parties		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable
	There is a legitimate need to send money from overseas and deposit it in a foreign country.		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	A money remitter is engaged to send the money overseas and deposit it in a foreign country.		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	The money remitter accepts legitimate money in the foreign country		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	The money remitter arranges for the funds to be made available and they or their counterpart in the receiving country arrange for illicit funds in the foreign country to be used to complete the deposit for the legitimate transaction		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	The legitimate money is then made available outside the foreign country where the deposit took place to the person in control of the illicit funds before it is deposited.		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	The person with the legitimate reason to send money to a foreign country is unaware that their transaction has been effected using illicit funds.		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable

Mapping Table - Clean Version

Typology	Key Indicators by Typology	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request
Casino accounts & facilities	Patron Source of Wealth is not commensurate with patron occupation and / or known net worth		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Source of funds for deposits cannot be verified (including gambling winnings)		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
Casino value instruments utilised	Purchasing chips and then cashing in nearly the same amount of chips within a short timeframe on multiple days		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable
	Large cash deposits often followed by large cash withdrawals at casinos.		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable
	Noticeable spending/betting pattern changes		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable
	High volume of transactions within a short period		Yes	Complete	Structuring / Top Bank Transactions	Transactional data from Bank Statements & SYCO	Not applicable
	Multiple chip cash outs on the same day.		Yes	Complete	Chip Cashing	Transactional data from Bank Statements & SYCO	Not applicable
	Structuring of chip/cheque transactions		Yes	Not Built	Not Built	Transactional data from Bank Statements & SYCO	Not applicable
	Multiple currency exchange transactions		Yes	Not Built	Not Built	SYCO Data	Not applicable
Currency Exchange	Large cash transaction with unknown source of funds		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Currency exchanges carried out by third parties		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Large, one-off, or frequent currency exchanges for customers not known to the casino.		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
	Dramatic or rapid increases in size and frequency of currency exchange transactions for regular account holders.		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Structured currency exchange		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Agents performed significant amount of cash deposit into front money account on behalf of patron but without reasonable support for the source of funds or purpose for the fund movements.		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Cross border transfer of funds within casinos of same group but in different countries		No	Not Built	Not Built	Not applicable	SYCO data - check with Crown
Funds transfers into casino using shell company	Source of funds for buy-in not disclosed.		Yes	Not Built	Not Built	SYCO Data	Not applicable
	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	No apparent relationship between the originator and the beneficiary of the fund transfers		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable
	Funds mainly used for chips purchase but gambling activities cannot be ascertained		No	Not Built	Not Built	Not applicable	Poker machine data / gambling Activity data
	The source of funds is difficult to be traced due to the intentional layering of transactions to hide the ultimate beneficial owners.		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable

Mapping Table - Clean Version

Typology	Key Indicators by Typology	Priority	Data Available	Dashboard Built	Dashboard Reference	Data Source	Additional Data Request
	Cashier orders or cheques issued by companies held by a tax haven registered company, concealing the identity of the ultimate beneficiary owner		Deep Dive Required	Deep Dive Required	Deep Dive Required	Not applicable	Not applicable