



June 23, 2025

Policy Division  
Financial Crimes Enforcement Network  
P.O. Box 39  
Vienna, VA 22183

**Re: Agency Information Collection Activities; Proposed Renewal; Comment Request; Renewal Without Change of Additional Records To Be Made and Retained by Casinos.**  
Docket Number FINCEN-2025-0003 and Office of Management and Budget (OMB) control number 1506-0054

Dear FinCEN,

The American Gaming Association (“AGA”) appreciates this opportunity to comment on the Department of Treasury’s Financial Crimes Enforcement Network’s (“FinCEN”) notice and request for comments, published in the *Federal Register* on April 23, 2025. The regulated gaming industry is eager to see regulations related to our anti-money laundering responsibilities be updated. These requests are in line with the administration’s stated priority, echoed by the Department of Treasury, of eliminating overly burdensome regulations, including for financial institutions, and FinCEN’s commitment towards modernizing BSA regulations to better promote the effectiveness and efficiency risk-based AML programs.

### Introduction

The AGA advocates for the U.S. gaming industry, which supports 1.8 million jobs nationwide, has a \$328 billion annual economic impact, and generates \$52 billion annually in tax revenue. The AGA also serves on the Bank Secrecy Act Advisory Group. Our membership spans across the country and consists of over 70 commercial and tribal casino operators, U.S.-licensed gaming suppliers, financial institutions, state gaming associations and other key stakeholders in the gaming industry. Each year, our members file tens of thousands of Suspicious Activity Reports (“SARs”) and Currency Transaction Reports (“CTRs”).

Since 1985, state-licensed casinos have been defined as “financial institutions” under the Bank Secrecy Act (“BSA”). Since that time, our members have developed and executed rigorous and sophisticated Anti-Money Laundering (“AML”) regimes and have served an integral role in aiding FinCEN and the law enforcement community in combatting money laundering and illicit financing. Our members dedicate significant time, resources, and staffing to maintain effective risk-based AML compliance programs to comply with the applicable BSA requirements and to prevent money laundering and other criminal activities through gaming. This includes: establishing a system of AML internal controls, policies, and procedures; ensuring independent testing of AML compliance; training casino personnel on their responsibilities under the programs, especially in the identification of unusual financial transactions or suspicious activities; and designating an individual or individuals responsible for assuring day-to-day AML compliance at all venues. In addition to maintaining robust AML programs, our members work hand-in-hand with federal, state, and local law enforcement on a regular basis. These



relationships provide real-time intelligence, foster open channels of communication, and enhance the efficacy of efforts to identify and prevent financial crimes.

The AGA has established a BSA Working Group with representation from all our member companies. Within that group, gaming compliance professionals can share best practices, discuss trends, and identify policy and regulatory priorities. In addition to this continuous engagement, the AGA also has published a guide on [Best Practices for Anti-Money Laundering Compliance](#) for several years, the most recent of which was published in 2022 and the next to be published later this year. This guide provides critical guidance on Know Your Customer procedures, risk assessments, training, recordkeeping, and other key facets of a successful AML program. Accordingly, it is a valuable resource for the gaming industry, other financial sectors subject to the BSA, government agencies, and law enforcement to help most effectively and efficiently guide their efforts in protecting the gaming industry and the broader financial system from money laundering and other illicit conduct.

We are grateful to FinCEN for its commitment to modernize BSA regulatory requirements and provide valuable regulatory guidance aimed at enhancing "the effectiveness, efficiency, innovation, and flexibility" of AML Programs. As discussed in this comment, the gaming industry has unique challenges and opportunities when it comes to BSA compliance, as compared to other financial institutions. The following represent the AGA's views on these issues.

#### **A. Targeted Guidance with Respect to Sports Betting and Online Gaming Issues**

Since the Supreme Court's 2018 decision in *Murphy v. National Collegiate Athletic Association*, sports betting and online gaming has been rapidly increasing in prominence within the gaming industry, resulting in approximately \$3.68 billion in gross gaming revenue. This new area poses novel considerations that are not addressed by current BSA regulations, which were written for gaming at brick and mortar casinos long before there was online gaming. For instance, consistent with state gaming requirements, it is common for a casino company ("licensee") to have an agreement with another entity to operate the online gaming platform/sportsbook ("operator"), with the licensee having little day-to-day involvement with the operator. In such cases, while the sports betting/iCasino license itself belongs to the licensee, the operator performs day-to-day functions largely independently (to varying degrees, depending on jurisdiction) of the licensee with the licensee typically receiving a fee and/or some percentage of revenue. In such cases, the operator performs all functions of the sports betting/iCasino operation, including: (i) developing and operating the sportsbook/iCasino software; (ii) branding and marketing the platform; (iii) managing the online gaming/sportsbook account creation process; (iv) processing all deposits and withdrawals; (v) underwriting all bets made; (vi) managing all back of house accounting; and (vii) handling all customer service functions and any patron dispute resolutions.

Given this breadth in operators' typical functions and operational responsibilities, the AGA would appreciate guidance from FinCEN with respect to the application of the BSA to these types of relationships, including which BSA requirements apply and to whom and to what extent casinos or operators must oversee or can reasonably rely on the other for the fulfillment of those BSA requirements. The AGA has submitted several requests for guidance on these issues and



repeated those requests following the Treasury Department’s own National Money Laundering Risk Assessment<sup>1</sup> in 2024 that called out legal online gaming as lacking adequate regulation. A more detailed request for guidance in this area is attached as an appendix. As online gaming models and relationships innovate and expand, there is an increasing need for this long-awaited guidance from FinCEN.

### **B. Information Sharing Programs and Feedback Loops**

Law enforcement and regulator feedback is essential to the effectiveness of the AML framework, as it enables the regulated financial sector to more effectively tailor and design internal controls while also ensuring that AML compliance programs are appropriately designed to detect the most significant threats and meet regulatory expectations. The AGA recommends establishing feedback mechanisms through which law enforcement provides the gaming industry with real-time information regarding how the SARs we are filing are advancing law enforcement efforts. In particular, the gaming industry, which filed over 62,000 SARs in 2024 would benefit from feedback loops with the government and law enforcement regarding what is most helpful to them in casino SARs and which SARs are leading to investigations and prosecutions.

Additionally, the AGA requests that casinos and other gaming operators subject to the BSA are authorized to participate in FinCEN Exchange. AGA members have a keen interest in participating in FinCEN Exchange, which would give casinos and gaming operators a better understanding of FinCEN and law enforcement priorities. As with a feedback loop, this would help the industry identify additional suspicious activity and thus provide law enforcement with more useful SARs. For many of these same reasons, AGA members would also welcome the opportunity to participate in information sharing under section 314(a) of the USA Patriot Act.

### **C. Increased SAR Sharing Abilities**

The AGA suggests that FinCEN consider an amendment to BSA regulations to allow for the sharing of SARs with a financial institution’s foreign branches, subsidiaries, and affiliates. Many U.S. gaming entities have foreign branches or subsidiaries. Allowing for international SAR sharing among these entities would provide financial institutions with a more holistic view of patron activity, create efficiencies in AML compliance programs, and enhance an institution’s ability to combat illicit finance risks and comply with the BSA.

Similarly, AGA members would appreciate an amendment to BSA regulations that allows for SAR information sharing between partners, given the novel expansion in partnerships between brick and mortar casinos and online gaming operators, the latter of which often has the information necessary for the former to file SARs.

### **D. Raise CTR and SAR Reporting Thresholds to Align with Inflation**

The BSA’s purpose is “to require certain reports or records where they have a high degree of usefulness in criminal, tax, or regulatory investigations or proceedings, or in the conduct of

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<sup>1</sup> <https://home.treasury.gov/system/files/136/2024-National-Money-Laundering-Risk-Assessment.pdf>



intelligence or counterintelligence activities, including analysis, to protect against international terrorism.”<sup>2</sup> The current CTR threshold of \$10,000 was established half a century ago in 1972.<sup>3</sup> If the CTR threshold were to be increased by inflation, the current threshold would be over \$70,000. Due to inflation, current CTR and SAR thresholds are so low that they now often capture transactions of little or no value to law enforcement.

In 2023, FinCEN reported that financial institutions filed approximately 20.8 million CTRs.<sup>4</sup> With each CTR consuming approximately 45 minutes of effort, the preparation and filing of CTRs resulted in over 15.6 million hours of labor and hundreds of millions of dollars in costs. The gaming industry continues to shoulder a heavy burden in preparing and submitting CTRs for all currency transactions that exceed \$10,000, when aggregated, over a 24-hour “gaming day.”

Industry and government auditors and examiners spend valuable time ensuring industry compliance with the current CTR threshold, while the industry may also face regulatory sanctions should they miss reporting transactions that have little or no material value to the government or law enforcement. To alleviate this misallocation of compliance and enforcement efforts in accordance with the objectives of AML Program Effectiveness, the AGA recommends increasing the CTR reporting threshold to align it with inflation since its promulgation.

For similar reasons, the AGA also recommends increasing the SAR reporting thresholds, which have been in place since 1996.

#### **E. SAR Lite Recommendation for Structuring**

Casinos filed over 62,000 SARs in 2024 and nearly 28,000 of those SARs related to structuring. Pursuant to federal law enforcement policy, structuring prosecutions generally are not brought unless there is evidence that the funds came from illegal sources.<sup>5</sup> Accordingly, the AGA recommends the creation of a “SAR Lite” for structuring-related offenses that would not require detailed factual narratives in the absence of information indicating that the individual’s funds are derived from illegal sources. A SAR Lite would still provide notice to the government of a customer’s structuring conduct should the government otherwise learn that the customer’s funds are derived from illegal sources. In those instances, the government could then pursue inquiries with the casino concerning the customer’s financial activity, while the casino would be relieved from undertaking the burdensome narrative preparation for a significant percentage of its SARs. This would significantly enhance AML program effectiveness by allowing the industry to reallocate these resources to higher priority aspects of BSA compliance, including those related to Know Your Customer obligations and enhanced due diligence.

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<sup>2</sup> 31 U.S.C. § 5311.

<sup>3</sup> 37 Fed. Reg. 6819, 6912 (Apr. 5, 1972) (final rule) (effective July 1, 1972).

<sup>4</sup> FinCEN Year in Review for FY 2023

<sup>5</sup> See “Criminal Investigation Enforced Structuring Laws Primarily Against Legal Source Funds and Compromised the Rights of Some Individuals and Businesses,” Treasury Inspector General for Tax Administration (April 4, 2017).



## **F. SAR Lite Recommendation for Chip Walking**

The gaming industry has benefited from increased engagement with law enforcement agencies to better understand how to implement AML programs most effectively. This engagement has provided the industry with critical information that has shaped internal AML programs as well as the allocation of resources. Importantly, as discussed above for structuring SARs, this engagement has highlighted the types of SARs that are most meaningful as well as those that may provide little to no value to law enforcement. One other example in the latter category concerns chip walking, which arises when a patron leaves a casino with a significant number of chips in his or her possession, without offsetting chip redemptions or chip buy-ins at another table and where the casino does not know the disposition of the chips. The gaming industry filed over 11,000 SARs in 2024 for chip walking.

In and of itself, chip walking often will not be suspicious. There are often innocent, mundane reasons for this behavior particularly when the casino operator reasonably expects the patron will return to the casino in the near future. For example, the patron may be a local customer who is well known to the casino and expected to soon return to use those chips on a subsequent visit. Alternatively, there may be a long line at the cage on the day in question, so the patron chooses to skip the line and use or exchange the chips at a later date.

The industry has received feedback from law enforcement that a SAR for these situations provides little value. The current examination environment, however, includes no recognition that there are legitimate reasons for a patron to depart from a casino with chips. Furthermore, there seems to be an evolving regulatory expectation that a SAR will be filed for any occurrence of a “chip walk,” usurping the casino’s ability to follow their own risk-based AML compliance criteria, which distinguish between suspicious and non-suspicious chip walks.

This dichotomy imposes a costly operational burden both on the casino industry and law enforcement. The casino industry must make extensive resource allocations for this conduct, even though the examination expectation is not aligned with law enforcement priorities. Meanwhile, law enforcement must comb through a large number of SARs to find the few instances in which those priorities are implicated.

Accordingly, the AGA suggests that FinCEN consider regulatory updates that allow for a SAR Lite, similar to as discussed above, for chip walking.

## **G. Clarify the Obligations for SAR Filings for Marijuana-Related Businesses**

The current legal situation of marijuana-related businesses that are licensed in an increasing number of states yet are still illegal under federal law continues to present complexities and challenges for many types of financial institutions, including casinos. FinCEN guidance to date on this issue appears designed primarily for banks and other financial institutions that have customers that are marijuana-related businesses and does not address providing services to the principals of these businesses who may be casino patrons.

The AGA requests that FinCEN provide updated guidance regarding SAR filing expectations for individuals associated with marijuana-related businesses, particularly those who own or are



employed by state-licensed marijuana-related businesses. Specifically, the gaming industry would welcome guidance on whether and how casinos should use FinCEN's 2014 marijuana guidance for filing SARs on patrons whose gaming funds appear or are known to be from marijuana-related businesses and in what situations casinos should or must file SARs on these patrons (e.g., whether casinos should file a Marijuana Limited SAR for such patrons).

#### **H. Geolocation Data as an Optional Field in SARs**

To increase the effectiveness of AML programs, we suggest expanding the geolocation data fields for cyber indicators on the SAR form and in the SAR reporting process, beyond the current standard of an IP address, to provide other optional geolocation fields. This would assist in ensuring that SARs truly reflect the most accurate, highly useful and relevant data, as IP addresses are often deficient sources of information in light of their dynamic and occasionally inaccurate nature as well as their ability to be spoofed and anonymized.

Incorporating multi-source, device-based geolocation data collection into a financial institution's onboarding or authentication process acts as a powerful deterrent to bad actors, facilitates the identification and prevention of suspicious activity in real-time, and has been proven to reduce fraud, particularly in novel industries, such as mobile sports wagering and internet gaming. Moreover, many financial institutions already collect multi-source, device-based geolocation data (e.g., GPS, Wi-Fi Triangulation, GSM). Accordingly, this data is readily available for compliance purposes and would be an apt optional field within SARs that would further the goals of AML Program Effectiveness.

#### **Conclusion**

The AGA and our members appreciate the opportunity to weigh in on AML regulations. To truly be effective in combating money laundering, we need to remain vigilant in our compliance, work closely with law enforcement and regulators, prioritize resources, and keep innovating.

To help facilitate communication with our federal partners, we ask that there be a feedback loop on SARs filings, that the gaming industry be allowed to participate in the 314(a) and FinCEN Exchange programs, and that SAR information be shared with appropriate foreign entities and gaming partners. To better align with strategic priorities, we request an increase in the SAR and CTR filing thresholds and the creation of a "SAR lite" specifically for chip walking and structuring, which are unique to the gaming industry. We also support the inclusion of optional fields for other types of geolocation data, besides IP addresses.

As we face new kinds and ways of doing business, we support updated guidance with respect to online gaming and marijuana-related businesses. All of these elements come together to represent a more effective and responsive AML regime. We look forward to continuing an ongoing dialogue with FinCEN and other financial institutions as we all work towards our shared goal of combatting money laundering.

Thank you for your consideration of these requests.



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## Appendix

### A. August 2023 Letter from the AGA to FinCEN re: Request for Guidance Follow Up

August 28, 2023

Director Andrea Gacki  
Financial Crimes Enforcement Network  
U.S. Department of Treasury  
P.O. Box 39  
Vienna, Virginia 22183-0039

Dear Director Gacki:

I write on behalf of the members of the American Gaming Association (“AGA”) to congratulate you on your recent appointment. We look forward to continuing the collaborative relationship the gaming industry has with FinCEN under your leadership.

The AGA is the premier national trade group representing the \$261 billion U.S. casino industry, which supports 1.8 million jobs across the country. Our membership spans across the country and consists of 77 commercial and tribal casino operators, U.S.-licensed gaming suppliers, financial institutions, and other key stakeholders in the gaming industry.

The AGA supports FinCEN’s efforts to promote compliance with the Bank Secrecy Act (“BSA”) including sitting on the BSA Advisory Group. Each year, the AGA convenes compliance professionals within our membership at our Anti Money Laundering (AML) Summit to discuss best practices and hear from relevant federal government representatives, including Acting Director Das in 2022.

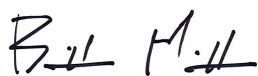
A reoccurring topic of concern is the ambiguity regarding AML responsibilities for online gaming or wagering platforms. Attached is a letter the AGA sent two years ago that explains the issue in greater depth and requests guidance from FinCEN.

We bring this to your attention as our request has remained unanswered and the need for such clarity has only increased. Since August 2021, six more states have legalized sports betting, two additional states have legalized iGaming and Americans have wagered almost half a trillion dollars, \$498.3 billion, legally online.

The AGA has met with FinCEN on this issue and can provide any additional information needed to issue appropriate guidance. Our Vice President, Government Relations Alex Costello ([acostello@americangaming.org](mailto:acostello@americangaming.org)) stands prepared to work with your staff.

Thank you again for your attention to these matters and your willingness to engage with the gaming industry.

All the best,



Bill Miller  
President and CEO American  
Gaming Association



August 12, 2021

VIA Electronic Mail

Acting Director Himamauli Das  
Financial Crimes Enforcement Network  
U.S. Department of the Treasury  
P.O. Box 39  
Vienna, Virginia 22183-0039

Re: Request for Anti-Money Laundering Guidance Regarding Casino/Operator Relationships

Dear Acting Director Das:

I write on behalf of the members of the American Gaming Association (“AGA”) to request guidance from FinCEN regarding the required anti-money laundering responsibilities for casinos when they provide a license to another company to operate an online gaming or wagering platform.

### **Background**

The AGA is the premier national trade group representing the \$261 billion U.S. casino industry, which supports 1.8 million jobs across the country. AGA also serves on the Bank Secrecy Act Advisory Group. Our membership spans across the country and consists of 73 commercial and tribal casino operators, U.S.-licensed gaming suppliers, financial institutions, destination marketing organizations, food and beverage suppliers, and other key stakeholders in the gaming industry.

The AGA supports FinCEN’s efforts to promote compliance with the Bank Secrecy Act (“BSA”) and FinCEN’s overall anti-money laundering efforts. For instance, on September 17, 2020, FinCEN released an advance notice of proposed rulemaking requesting public comment on potential regulatory amendments in order to “modernize the regulatory regime” and “provide financial institutions with greater flexibility in the allocation of resources, resulting in the enhanced effectiveness and efficiency of anti-money laundering programs.” 85 Fed. Reg. 58023. In response to that request, AGA submitted a letter on November 16, 2020 outlining a number of proposed recommendations to enhance the effectiveness of anti-money laundering (“AML”) programs, particularly within the gaming industry.

One of the recommendations in our November 16 letter relates to the need for guidance regarding the AML responsibilities of casinos licensors and online operators when the latter operates an online gaming business under the license of the former. Ltr. at 5-6. This letter provides additional context and detail for that recommendation.

Since the Supreme Court's 2018 decision in *Murphy v. National Collegiate Athletic Association*, 138 S. Ct. 1461 (2018), sports betting and online gaming has been rapidly increasing in prominence within the gaming industry, resulting in approximately \$3.68 billion in gross gaming revenue. FinCEN has provided some guidance in this area by stating that sports betting and other mobile gaming services "are no different than other products and services" and that a casino's AML obligations for sports betting "are the same" regardless of where the services are offered.<sup>1</sup>

## Analysis

There are novel considerations in this space that are not addressed by current BSA regulations. The regulations were written for gaming at brick and mortar casinos long before there was online gaming or mobile sports betting.

The industry needs guidance regarding what BSA responsibilities exist for casinos and online operators when casinos grant a license to operators to run an online gaming platform or sportsbook.

Consistent with state gaming requirements, it is common for a casino company that operates under a state casino license ("licensor") to have an agreement with another entity to operate the online gaming platform/sportsbook ("operator"), with the licensor in some cases having little or no day-to-day involvement with the operator. In such cases, while the sports betting/icasino license itself belongs to the licensor, the operator functions independently (to varying degrees, depending on jurisdiction or business arrangement) of the licensor. The licensor typically receives a fee and/or some percentage of revenue. In such cases, the operator performs all functions of the sports betting/icasino operation, including: (i) developing and operating the sportsbook/icasino software and ensuring compliance with all geolocation requirements; (ii) branding and marketing the platform; (iii) managing the online gaming/sportsbook account creation process; (iv) establishing all customer accounts; (v) processing all customer deposits and withdrawals; (vi) underwriting all bets made; (vii) managing all back of house accounting; and (viii) handling all customer service functions and any patron dispute resolutions. The licensor generally does not have visibility into the accounts or transactions of the customers of the operator.

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<sup>1</sup> Remarks of Kenneth A. Blanco, Director, FinCEN, August 13, 2019, *available at* <https://www.fincen.gov/news/speeches/prepared-remarks-fincen-director-kenneth-blanco-delivered-12th-annual-las-vegas-anti>.

Under current BSA regulations, the compliance responsibilities of the licensor and the operator are not addressed. Consequently, it is not clear whether the licensor, the operator, or both, are responsible for satisfying the BSA/AML obligations that arise in connection with activity on the online platform and which party would be liable for any compliance failures.

Since the operator, and not the licensor, is typically handling all customer interactions, as well as processing all financial transactions, the AGA would appreciate guidance from FinCEN with respect to what AML obligations rest with the licensing casino, or whether those obligations may be fulfilled by the operator that actually runs the online gaming platform/sportsbook and establishes customer relationships and conducts customer transactions.

Specifically, the AGA respectfully requests that FinCEN issue guidance stating that entities which operate an online gaming or sportsbook platform under the license of another casino are separate independent financial institutions subject to the BSA requirements for casinos. To do so, the guidance would state that entities who maintain online gaming or wagering platforms that exceed annual gaming revenue of more than \$1 million are considered “gaming establishment[s]” under the Bank Secrecy Act. See 31 U.S.C. § 5312(a)(2)(X).<sup>2</sup> As a result, these operators would have an independent obligation to comply with BSA/AML obligations that arise from activity on the platform, including the filing of Suspicious Activity Reports (“SARs”). The casino licensors would have no BSA responsibility for the operators’ compliance and no liability for any compliance failures. These online platform operators would, of course, remain subject to state casino laws and could be examined by state gaming authorities as well. This interpretation would reflect the reality that the operator is responsible for all customers and conducts all customer transactions. Under this arrangement, information sharing and collaboration between licensors and operators would be permitted.

In the alternative, the operator could be subject to the BSA obligations of a casino while casinos that provide licenses to operators would be responsible for conducting reasonable oversight of the BSA/AML programs of these online operators. The guidance could state, for example:

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<sup>2</sup> Precedent exists for FinCEN to issue guidance stating that certain entities meet the statutory definition of “financial institution” in the BSA. In 2007, for instance, FinCEN issued guidance stating that “racinos” are subject to the BSA if “state law defines or characterizes slot machine or video lottery operation at a racetrack as a ‘casino, gambling casino, or gaming establishment.’” Frequently Asked Questions Casino Recordkeeping, Reporting, and Compliance Program Requirements Q/A No. 3, FinCEN, Nov. 14, 2007, *available at* <https://www.fincen.gov/resources/statutes-regulations/guidance/frequently-asked-questions-casino-recordkeeping-reporting-0>.

*Any online gaming platforms or online sportsbooks that are operating pursuant to the license of another casino are independently required to comply with relevant anti-money laundering laws and regulations, including the filing of Suspicious Activity Reports. A casino granting a license to online gaming platforms or online sportsbooks will not be held responsible in the event that the online operator fails to comply with its BSA/AML obligations if the casino has taken the following steps to oversee the AML program of the online platform using their license:*

- *Require by contract that the online operator maintain a reasonable risk-based BSA/AML program that complies with the BSA compliance program, recordkeeping, and reporting obligations for casinos, including setting forth BSA/AML responsibilities in the event that the online operator maintains any physical presence (e.g., retail sports book locations) on the licensee's property;*
- *Require that the licensee report any significant issue of non-compliance to the licensor, FinCEN, and state and Tribal gaming authorities;*
- *Reserve the right to terminate a license with an operator in the event of a finding of significant non-compliance with any applicable laws, including relevant anti-money laundering laws or regulations by any gaming, regulatory, or law enforcement authority;*
- *Take reasonable oversight measures to ensure an adequate BSA/AML program is established and maintained.*

Factors that could be considered to determine whether a casino conducts reasonable oversight of operators' BSA/AML programs include:

- the quality of the review of the operators' BSA/AML program before granting a license, including its measures to identify customers establishing accounts, detect potentially fraudulent activity, and identify report suspicious activity;
- the steps taken to evaluate the operators' BSA/AML program on an ongoing basis, such as whether the operator periodically advises of any significant updates to its program or risk profile, provides reports of independent testing and compliance examinations, or discloses notable BSA/AML issues that arise to the casino; and
- whether any periodic reviews of the operators' BSA/AML program occurs by the casino and the results of such reviews.



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The AGA would appreciate the opportunity to provide additional specific information and insights to FinCEN on these issues in a virtual or in-person meeting. Our Senior Director of Government Relations, Alex Costello ([acostello@americangaming.org](mailto:acostello@americangaming.org)) stands prepared to work with your staff to respond to questions and provide any additional details you may require.

Thank you again for your continued attention to these matters and willingness to engage with the gaming industry.

All the best,

Bill Miller  
President and CEO  
American Gaming Association