

# THE QUIZ ANSWER SHEET

## Section 1

1. The club's AML/CTF program is designed to:
  - a. **allow the club to identify, mitigate and manage money laundering and terrorist financing risks**
  - b. advise staff how to launder money
  - c. keep the staff fit
  
2. Money laundering is:
  - a. what happens to the money that you leave in the pocket of your jeans when you wash your jeans
  - b. only related to international terrorism
  - c. **the process by which illegally obtained funds are given the appearance of having been legitimately obtained**
  
3. A club is a reporting entity when:
  - a. it becomes a member of ClubsVIC
  - b. it provides bingo facilities
  - c. **it provides wagering and/or gaming machine facilities**
  
4. In order to comply with its AML/CTF obligations after 12 December 2008 the club must:
  - a. report all cheque **and** cash payments of \$10,000 or more to AUSTRAC
  - b. **report all cash payments of more than \$10,000 or more to AUSTRAC**
  - c. report all cheque payments of \$10,000 or more to AUSTRAC
  
5. The customer identification procedure must be followed when:
  - a. a customer is paid \$10,000 or more in cash
  - b. **a customer is paid \$10,000 or more in cash or cheque**
  - c. a customer is paid \$1,000 or more by cheque
  
6. What are designated services under the AML/CTF Act?
  - a. electronic gaming machines, wagering, keno and bingo
  - b. electronic gaming machines, wagering and bingo
  - c. **electronic gaming machines and wagering**
  
7. Which Clubs are subject to the AML/CTF Act?
  - a. **clubs which provide electronic gaming or wagering facilities**
  - b. all Clubs
  - c. clubs which provide bingo but not electronic gaming or wagering facilities

8. The AML/CTF Act requires that clubs who provide designated services must:
- verify the identity of persons who collect \$10,000 or more
  - have an AML/CTF program
  - be registered with AUSTRAC
  - record any suspicious matters
  - All of the above**
9. In your role as a staff member involved in the provision of gaming and/or wagering services you must:
- be familiar with the club's AML/CTF program.
  - do all necessary things to ensure the club complies with the AML/CTF program.
  - implement the customer identification and reporting procedure contained in part B of the clubs's program
  - All of the above**

## Section 2

10. Third party purchasing of credits occurs when:
- someone places a bet on behalf of another person
  - three people play the gaming machine all together
  - the person who collects the winnings is not the person who won the prize**
11. Which of the following are AML/CTF risks that you should be aware of as a club employee:
- third party purchase of credit
  - the use of stolen or counterfeit money
  - staff collusion
  - abnormal play
  - all of the above**
12. A money launderer may offer a winning customer more money than a winning ticket is worth because:
- launders are generous
  - launders want a chance to talk to the cashier
  - once they cash the ticket launders have a legitimate source for the cash**
13. Launderers may load up a machine with a large amount of cash then only play for a short time because:
- they get sick of the noise in the gaming room
  - they are afraid they may be being watched
  - they can then get a ticket for a legitimate source of cash**

### Section 3

14. If the President wins \$11,000 on a gaming machine:
- it is not necessary to implement the customer identification procedure because you know her and you must provide her with all her winnings in cheque
  - she can take \$1,000 in cash and must take \$10,000 in cheque
  - you must follow the customer identification procedure and provide her with all her winnings in cheque**
15. Which KYC **information** should you collect prior to paying out \$10,000 or more?
- name, residential address and date of birth**
  - phone number. and date of birth
  - name and residential address
16. You should obtain KYC **documentation** to verify?
- a customer's name, residential address and date of birth
  - a customer's name and either their residential address or date of birth**
  - a customer's address and date of birth
  - any one of the customer's name, address and date of birth
17. When you collect KYC information you should:
- tell other staff members how old the customer is
  - record the details in the club's AML/CTF register and ask for KYC documentation**
  - immediately make the payment to the customer if you believe the information is correct
18. When you collect KYC documentation you should:
- show it to the compliance officer
  - take a copy if possible, and record details & copies in the club's AML/CTF register**
  - dispose of all records of the customer's details to ensure their privacy is maintained
  - all of the above
19. When should you withhold payments of \$10,000 or more?
- when the payout is from gaming machines and the customer requests that the payment be made in cash
  - when the customer has only played the gaming machines for a short period of time before winning the jackpot
  - when the customer fails to provide KYC documentation to verify the customer's KYC information**

20. What should you do if a customer has won more than \$10,000 but is unable to provide the necessary KYC documentation during your shift:
- pay them the money if they promise to provide you with documents later
  - immediately report the matter to AUSTRAC
  - withhold the payment, fill-in the register as far as possible, and advise the compliance officer or, in the absence of the compliance officer, the duty supervisor**
  - raise the cheque and leave it in the safe for later
21. If a customer provides the KYC documentation after 14 days have expired you should:
- refuse to make the payment
  - make the payment and report the matter to AUSTRAC
  - refer the matter to the compliance officer or, in the absence of the compliance officer, the duty supervisor**
22. If a customer asks for a payment of \$10,000 or more to be made to a third party, **and** you suspect money laundering you should:
- refuse the request
  - implement the customer identification procedure for the third party
  - implement the customer identification procedure for the actual winner
  - implement the customer identification procedure for the third party and the actual winner**
23. What should you do if a customer requests that winnings of more than \$10,000 be paid to a company:
- pay the money to the company provided the winner's KYC information can be verified
  - refuse the request and refer the matter to the compliance officer or in the absence of the compliance officer the supervisor**
  - pay the money to the company and then report the matter to AUSTRAC

#### Section 4

24. A suspicious matter occurs when:
- the compliance officer is having an affair with the president
  - a customer fails to provide KYC documentation within 14 days**
  - a customer asks for a payment to be made to a third party

25. If you suspect that illegal activity is occurring in the gaming room you should report it to the compliance officer or, in the absence of the compliance officer, the duty supervisor:
- only if it involves the board members
  - only if it involves money laundering or terrorism
  - only if you can't contact the police
  - every time, because the AML/CTF program covers all illegal activity, not just money laundering and terrorism**
26. If you suspect that the compliance officer is involved in money laundering or is failing to comply with aspects of the club's AML/CTF program you should report your concerns to:
- other staff members
  - the compliance officer
  - the manager and/or a board member**
  - AUSTRAC
27. Which of the following is not a suspicious matter:
- a customer's identity cannot be verified by implementation of the customer identification procedure
  - a customer does not provide KYC documents to verify their identity within 14 days
  - a person regularly wins money on a gaming or wagering facility**
  - you suspect that illegal activity is happening
28. If you suspect that a staff member is involved in a suspicious matter you should:
- approach the staff member and ask them if they are involved in money laundering or terrorist financing
  - do nothing as it is the compliance officer's responsibility to monitor staff not yours
  - advise the compliance officer of your suspicions**
  - discuss your suspicions with other staff members and ask their advice
29. Which employees of the club are exempt from the AML/CTF Act:
- Board members
  - All staff involved in wagering or gaming
  - The compliance officer
  - All of the above
  - None of the above**

30. If a suspicious matter arises:
- a. you should advise each employee involved in wagering or gaming of the identity of the persons involved
  - b. you should advise each board member of the identity of the persons involved
  - c. **you should advise the compliance officer who must make a report to AUSTRAC and advise no other person about the issue**
31. When you witness a suspicious matter you should
- a. **report the matter to the compliance officer or, in the absence of the compliance officer, to the supervisor who will assess the situation**
  - b. ask the persons involved to immediately leave the club's premises
  - c. ring AUSTRAC immediately to report the matter

## Section 5

32. When a club reports a suspicious matter to AUSTRAC:
- a. where possible, each person involved in the matter should be advised that a report has been made to AUSTRAC
  - b. the club's board members should be advised that a report has been made to AUSTRAC
  - c. **no person other than the compliance officer should be advised that a report has been made to AUSTRAC**
33. Where you are aware that a staff member has been reported to AUSTRAC you should:
- a. inform other staff members who can observe the person's behaviour
  - b. inform the board members who need to know who is under suspicion of money laundering
  - c. tell your friends at your next dinner party
  - d. **discuss the matter with nobody except the compliance officer**

## Section 6

34. If you notice that the club's AML/CTF register has been left in a place where it can be accessed by members or staff you should:
- close the register if it is opened and advise other staff members where to find the register
  - return the register to the appropriate place and advise the compliance officer of the incident**
  - look in the register to identify the persons reported to AUSTRAC and check with other staff members if any reported person may have seen the register
35. You suspect a board member has been reported to AUSTRAC by the club compliance officer, what should you do?
- tell your manager immediately
  - ensure you do not disclose any information to any other person/s**
  - advise the matter with the president
36. If you have witnessed a suspicious matter and the compliance officer is not available you should:
- approach the person you suspect and advise them you are going to report their behaviour
  - tell the supervisor on duty**
  - ring the president at home and let him know what you suspect
  - ignore the matter because you are not allowed to discuss it with any other person/s

## Section 7

37. If you fail to implement the club's AML/CTF program:
- you may be charged under the AML/CTF Act and the club may be entitled to terminate your employment**
  - you will have your pay docked
  - the club is required to report the matter to AUSTRAC
38. The AML/CTF Act provides for penalties against :
- clubs and individual employees who do not comply with the AML/CTF Act**
  - clubs who do not comply with the AML/CTF Act
  - individuals who do not provide their KYC information to clubs