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**From:** Mike Moore [MMoore@peppermillcas.com]  
**Sent:** Friday, March 31, 2006 4:06 PM  
**To:** Comments, Regulation  
**Subject:** 1506-AA84 Proposed Amendments to Bank Secrecy Act Regulations

I have read the recommended changes to the Bank Secrecy Act Regulations and wish to make a few comments concerning the recommended change addressing "Bills inserted into electronic gaming devices-103.22(b)(2)(i) (I)". Every machine on most casino floor have a bill acceptor as like in many jurisdictions coins are no longer used. When a guest cashes out they receive a ticket which can be played in another machine in lieu of currency or cashed out at a ticket exchange kiosk or slot booth. Our machines are set so that 3,000 credits are the most that can be accrued. Anything more than 3,000 credits are automatically cashed out (ticket) printed for any amount over 3,000 credits, for penny machines this is \$300, dollars \$3,000 etc. The cashed out ticket if over \$1,199 cannot be cashed out at a ticket redemption kiosk, it must be cashed out at a slot or cashier cage. Multiple transactions that would take any single guest over \$3,000 would be logged. If a guest were to attempt to launder smaller bills through a ticket redemption kiosk they would find that if \$20 bills are inserted the kiosk is set to break the bills down to \$5 denominations, it does not exchange smaller denominations for larger. The ticket redemption kiosks will dispense \$100 only for cash outs of tickets up to \$1,199. Under current machine technology players may be issued a card (Club Card) which would be inserted into a card reader on the machine. Their activity can be tracked only as long as their card has been inserted. If the card reader is not functioning no activity will be recorded. Also if the guest refuses to use their card there would be no tracked activity. If as a player and I was attempting to launder funds through a slot machine the first thing I would do is to steal another guests card. Many guests leave their cards in the machine when they move to another location or leave the casino. As far as I am aware there is no technology currently available that would allow a casino to disable a slot machine so that it could not be played without a card.

Even if there were cards would continue to be stolen by those attempting to launder money. Should a guest be required to insert their card and enter a pin number an individual attempting to launder funds would very easily be able to observe the pin number being entered as the keypad is in plain view of anyone passing by.