

Internal Escalation Memorandum

an internal memorandum circulated inside a casino, checked against the confidentiality rule that governs what a document may say about a filing | Final specimen

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A memorandum that describes conduct and, in four places, also discloses that a report was filed.

FINAL TEXT

SPECIMEN, PREPARED BY EDITFAST FOR ILLUSTRATION. NOT A REAL RECORD.

Prepared for Blue Meridian Resort (fictitious), internal memorandum to floor management

EXTRACT FROM THE COMPLIANCE RECORD (reproduced unchanged in both panels)

CR-1 A report has been filed with FinCEN in respect of the activity described below. The filing itself and its existence are confidential.

CR-2 The underlying facts recorded by the compliance function: on three consecutive evenings a patron bought chips with currency in amounts of \$4,200, \$3,900 and \$4,400, at three different tables, and cashed out by check each night.

CR-3 The compliance function has determined that this memorandum should go to floor management so that staff know what to watch for.

CR-4 Floor management is not part of the compliance function and is not a recipient permitted to be told that a filing exists.

CR-5 The patron is a person involved in the reported transactions.

MEMORANDUM: PATRON ACTIVITY, TABLES 4, 7 AND 11

Please note the pattern below and watch for a repeat.

On three consecutive evenings a patron bought chips with currency in amounts of \$4,200, \$3,900 and \$4,400, at three different tables, and cashed out by check each night.

Do not discuss this memorandum or the activity it describes with the patron. If he asks why his play is being logged, say that table logs are kept as a matter of routine.

Retain your table logs and send them to compliance on request.

[Query to compliance: the draft told floor management that logs would go into a supporting file. Under 31 CFR 1021.320(d), supporting documentation is identified as such and is deemed to have been filed with the report, so a sentence naming that destination tells its reader a report exists. The instruction to retain and send the logs is unchanged.]