



JIM GIBBONS  
*Governor*

STATE OF NEVADA  
**GAMING CONTROL BOARD**

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**TO: ALL GROUP I AND GROUP II NONRESTRICTED LICENSEES AND INTERESTED PERSONS**

**RE: TITLE 31 PATRON IDENTIFICATION PROCEDURES**

Since July 1, 2007, many nonrestricted gaming licensees in Nevada have implemented policies and procedures designed to comply with the requirements of the Bank Secrecy Act (BSA) and related cash transaction reporting and recordkeeping requirements of Title 31 C.F.R. Part 103.

The Board has received various inquiries from both licensees and patrons regarding established procedures that require patron identification (including social security numbers) at transaction amounts less than \$10,000. The inquiries center around the licensee's refusal to complete certain cash transactions over a "licensee specific" threshold when the patron does not supply the requested identification.

As you know, the Board has no enforcement authority over the federal Bank Secrecy Act or related regulations. To that end the Board will not advise licensees regarding their efforts to comply with the federal requirements. As a result, if a licensee chooses to implement an identification standard for transactions less than \$10,000, the Board will support a licensee who refuses to make a cash payment until the patron provides appropriate and requested information. For race and sports winning tickets, if a patron does not provide the appropriate identification, the casino shall maintain the unpaid status of the ticket in the bookmaking system.

To avoid patron complaints, licensees may want to consider using Title 31 information cards that generally explain the BSA requirements and any related policies that the licensee has implemented. As long as the information cards are not used to assist patrons in evading BSA requirements, such cards may be useful in providing patrons with explanations of the federal rules and casino policies and procedures.

Please remember policies related to obtaining a patron's identification are the responsibility of each licensee. It is important to apply those policies in a fair and consistent manner.

Sincerely,

Mark A. Clayton  
Board Member

MAC/BS:lma

cc: Dennis K. Neilander, Board Chairman  
Randall E. Sayre, Board Member  
Audit Division  
Enforcement Division