

Indiana Gaming Commission: Overview of Regulatory and Criminal Investigations

GAMING INTEGRITY DIVISION
DIRECTOR FRANK BRADY
INVESTIGATOR BILL PEEVLER
INVESTIGATOR MANNY BECKER



Indiana Gaming Commission Enforcement

What type of crimes could the Gaming Commission assist you with?



Indiana Gaming Commission Gaming Control

What type of crimes could the Gaming Commission assist you with?

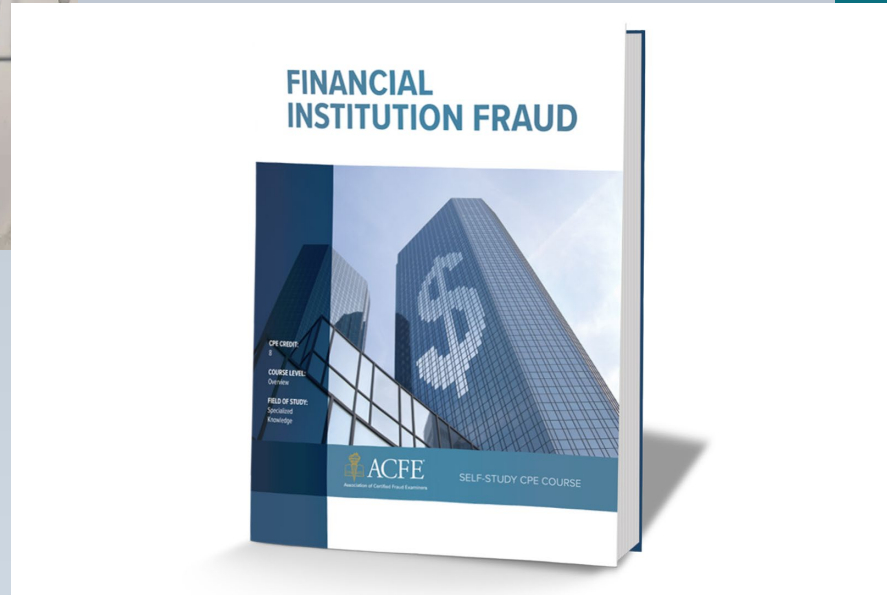


Gaming Integrity Division



Bank Secrecy Act (BSA) & Anti-Money Laundering

New Tripoli Bank
Because people are more valuable than money.

An infographic illustrating various money laundering techniques. It features several icons: a bank building labeled 'BANK', a person at a computer labeled 'FAKE DOCUMENTS', a person at an ATM labeled 'OFFSHORE ACCOUNT', a stack of money labeled 'MONEY CASH', a person in a suit labeled 'CRIME AND TERRORISM', a prison cell labeled 'PRISON', and a person in a suit labeled 'BRIBE'. The background is white with a teal vertical bar on the left.

LEGAL DISCLAIMER

Information provided by the Indiana Gaming Commission (IGC) Enforcement Agents or Investigators is lead information only and **is to be used for investigative purposes only.**

The Casino, Racino and Sports Book are the keepers of their records. Documents, reports, and video will require legal process for any information that will be used for probable cause, evidence or court proceedings.

IGC Enforcement can provide you with a subpoena outline for each property to ensure you receive the information for the investigation.

Objectives:

In this presentation participants will learn:

1. How the IGC Enforcement Agents and Investigators may assist by providing **lead** information for investigative purposes.
2. What casino records are available that may assist in their investigation.
3. What types of cases may develop at casinos that IGC Enforcement Agents or Investigators may need your assistance for further investigation and prosecution.

Records from Casino - Racino – Sportsbook – Sportsbook App

Player Tracking – Gaming Activity, Average Wager, Number and Dates of Visits with notes.

MTL – Multiple Transaction Logs

CASH Transactions over \$3K cumulative in a gaming day.

CTR – Cash Transaction Report

Transactions over \$10K in any transaction cash in or out.

SAR – Suspicious Activity Reports - Documented by any casino personnel.

CSADR – Child Support Arrearage Delinquency Report - Any winning SB Ticket over \$600 or \$1,200 Jackpot.

Security Report – Documents any activity in which security personnel may have been directly or indirectly involved. Also, any criminal investigation by IGC Enforcement.

Surveillance Report – Documents any criminal, regulatory or suspicious activity.

ID Scanner – ID or DL may have been scanned upon entering Casino or Sportsbook.

Money Laundering – 35-45-15-5



Patron brings in \$41K in \$20 bills and buys casino chips. Less than 1 hour later patron returns to cash in his chips of \$49K. Three days later patron again brings \$35K in \$20 bills and cashes out \$44K with minimal gaming.

Surveillance – Video Documentation

Table Games rating – Documented minimal play

Cage records – Documented Cash IN and Cash OUT

IC 35-44.1-2-1 Perjury

Sec. 1. (a) A person who:

(1) makes a false, material statement under oath or affirmation, knowing the statement to be false or not believing it to be true; or



IC 35-44.1-2-1 Perjury

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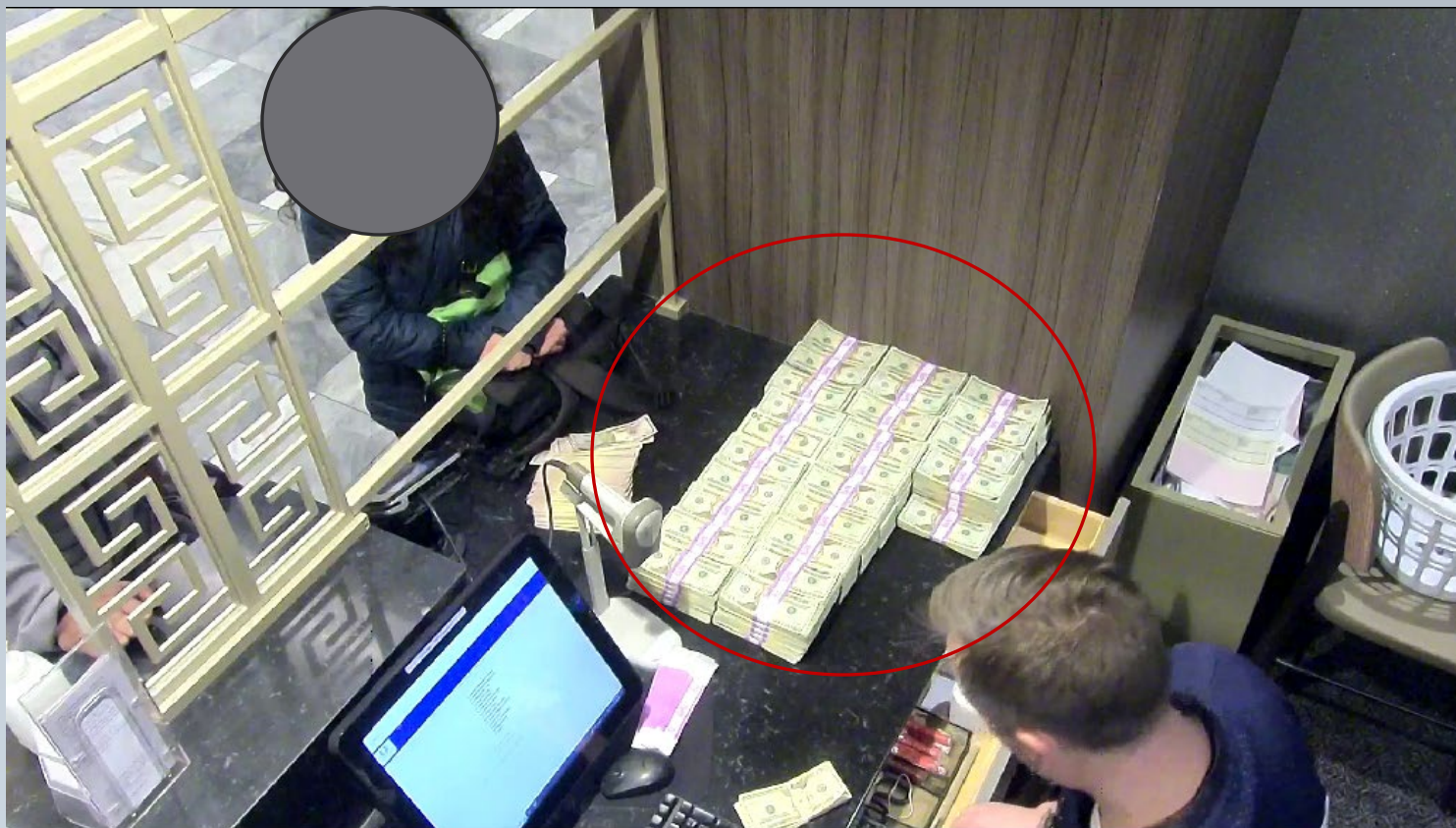
(1) makes a false, material statement under oath or affirmation,
knowing the statement to be false or not believing it to be true;

Identity Deception – False ID

W9 Form – Documents wrong SS#

Part II Certification Under penalties of perjury, I certify that: 1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me);

December 15, 2022



Totals

\$242,000.00 in \$20 Bills

\$20,000.00 in \$50 Bills

-\$2,000.00 returned to QI

\$260,000 in \$5,000.00 Cheques

\$3,540 handed to Zhao from green backpack

Unknown amount still in green backpack

IC 35-45-15-5 Money Laundering

IC 35-45-15-5 Money laundering;

Sec. 5. (a) A person that knowingly or intentionally:

- (1) acquires or maintains an interest in, **receives, conceals, possesses, transfers, or transports the proceeds of criminal activity;**
- (2) **conducts, supervises, or facilitates a transaction involving the proceeds of criminal activity;** or
- (3) invests, expends, receives, or offers to invest, expend, or receive, the proceeds of criminal activity or funds that are the proceeds of criminal activity, and **the person knows that the proceeds or funds are the result of criminal activity;**

commits money laundering, a Level 6 felony. However, the offense is:

- (A) a Level 5 felony if the value of the proceeds or funds is at least fifty thousand dollars (\$50,000);

IC 35-45-15-1 "Criminal activity" defined

IC 35-45-15-1 "Criminal activity" defined

Sec. 1. As used in this chapter, "criminal activity" means any offense that:

- (1) is classified as a felony under Indiana or United States law; or
- (2) occurs in another state and is punishable by confinement for more than one (1) year under the laws of that state.**

As added by P.L.112-1998, SEC.2.

Narcotic Investigations

Mr. DOE from Lexington, KY

Federal parole for prior drug trafficking conviction.

Wagering activity at Horseshoe South and Belterra suspicious due to sudden large amounts. He is banned from properties for KYC. Takes wagering activity to Hollywood casino. Later banned from that property as well. Begins to use proxies (Agents) to make his wagers. There were 6 other proxies making wagers at Belterra and Hollywood casino.

A joint investigation by the Nicholasville, KY PD and Federal Parole agents found **DOE** was involved drug trafficking. Case was later adopted by the IRS CI unit for the money laundering.

Player tracking and Cage records assisted in documenting \$3.2 million in transactions.



Fraud (Financial Institution) - IC 35-43-5-4

Mr. JOHNSON conducted, supervised and facilitated numerous transactions at Hollywood Casino involving the proceeds of criminal activity. This was a check fraud crime initiating in Cincinnati, OH.

Surveillance – Mr. **JOHNSON** with each co-defendant.

Cage records – Documents of each cash advance transaction.

ID Scanner – Positively identified Mr. Brown and others

In total **JOHNSON** facilitated cash transactions of over \$49K and involved 8 other co-conspirators.

Sec. 4. (a) A person who:

(3) **The victim was a financial institution.**

Subpoenas and Search Warrants

Bank Records

- Bank Statements
- Safe Deposit Box
- Loan Applications

Casino

- Cheques (Chips)
- Receipts - Payout
- W-2G Documents
- TITO's (Vouchers)
- Credit Applications

Sportsbook

- Ticket/s
- Receipt/s
- Receipts – Payout
- W-2G Documents
- Debit/Credit Card
- Pre-Paid cards
- Banking Docs
 - Zelle
 - PayPal
 - CashApp

Sportsbook Apps

- Cell phone
- Computers
- Debit/Credit Card
- Pre-Paid cards
- Banking Docs
 - Zelle
 - PayPal
 - CashApp

Casino Documents and Items

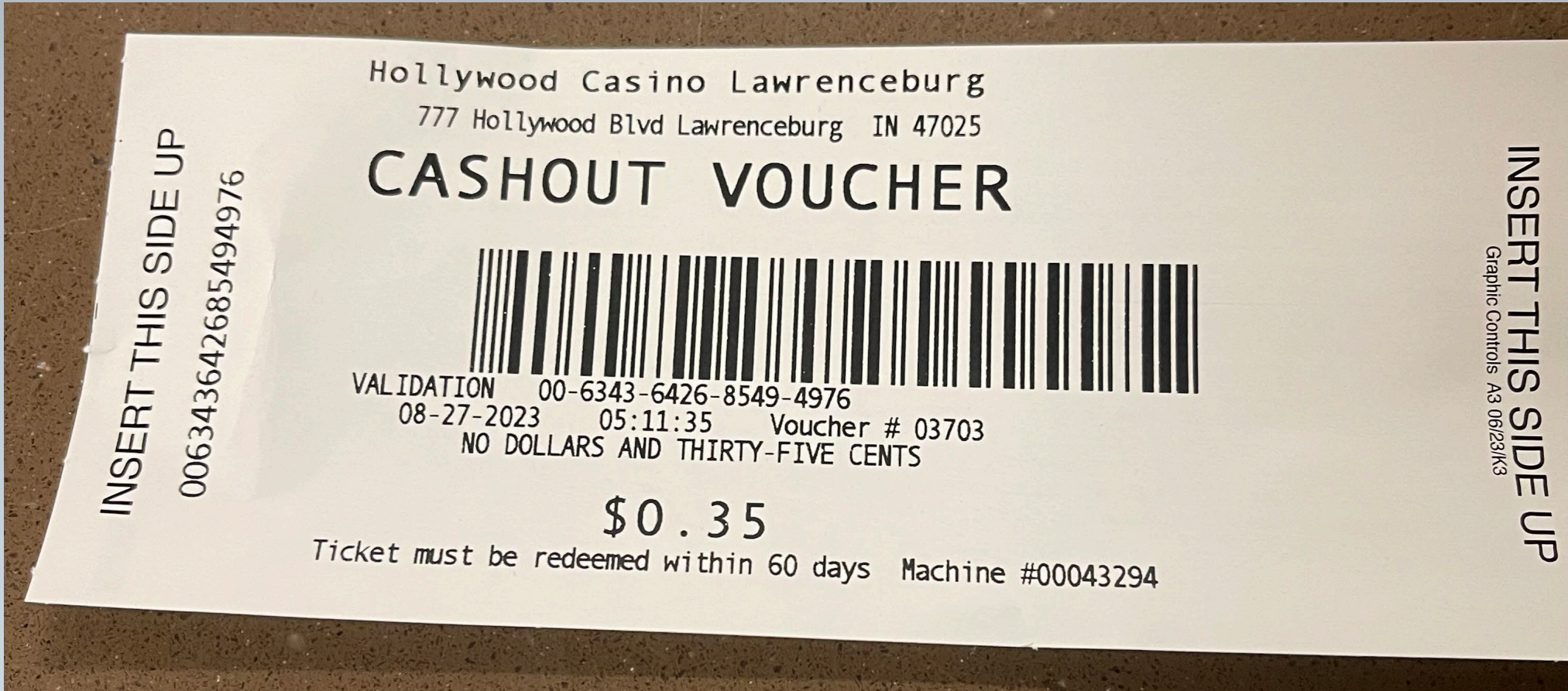
INDIANA GAMING COMPANY, LLC
JACKPOT REQUEST

DATE 8/20/23 TIME 10:38
MACH. # 42893 LOCATION LK-62-3
DENOMINATION \$1 FEDERAL TAX WITHHELD _____
SYMBOLS JP1584 CREDITS PLAYED 10
TOTAL AMOUNT OF JACKPOT* 1584

*Subject to verification
Social Security # 402 92 8990
Customer Signature Mary Bails
Employee Signature & Badge number [Signature] 13799



TITO – Ticket In Ticket Out is Cash \$\$\$



Sports Wagering Tickets



IC 35-45-6-2 Corrupt Business Influence

IC 35-45-15-1 "Criminal activity" defined

Sec. 1. As used in this chapter, "criminal activity" means any offense that:

(1) is classified as a felony under Indiana or United States law; or

IC 35-45-6-2 Corrupt business influence

Sec. 2. A person:

(1) who has knowingly or intentionally received any proceeds directly or indirectly derived from a pattern of racketeering activity, **and who uses or invests those proceeds or the proceeds derived from them to acquire an interest in property** or to establish or to operate an enterprise;

(2) who through a pattern of **racketeering activity**, knowingly or intentionally acquires or maintains, either directly or indirectly, an interest in or control of property or an enterprise; or

(3) who is employed by or associated with an enterprise, and who knowingly or intentionally conducts or otherwise participates in the activities of that enterprise through a pattern of racketeering activity;

commits corrupt business influence, a Level 5 felony.

IC 35-45-6 Chapter 6. Racketeer Influenced and Corrupt Organizations

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IC 35-45-6-1 Definitions

Sec. 1. (a) The definitions in this section apply throughout this chapter.

(d) "Pattern of racketeering activity" means engaging in at least two (2) incidents of racketeering activity that have the same or similar intent, result, accomplice, victim, or method of commission, or that are otherwise interrelated by distinguishing characteristics that are not isolated incidents. However, the incidents are a pattern of racketeering activity only if at least one (1) of the incidents occurred after August 31, 1980, and if the last of the incidents occurred within five (5) years after a prior incident of racketeering activity.

(e) "Racketeering activity" means to commit, to attempt to commit, to conspire to commit a violation of, or aiding and abetting in a violation of any of the following:

(21) Perjury ([IC 35-44.1-2-1](#)).

(28) Dealing in or manufacturing cocaine or a narcotic drug ([IC 35-48-4-1](#)).

(29) Dealing in methamphetamine ([IC 35-48-4-1.1](#)).

(34) Dealing in marijuana, hash oil, hashish, or salvia ([IC 35-48-4-10](#)).

(35) Money laundering ([IC 35-45-15-5](#)).

Bank Robbery – Agency Assist



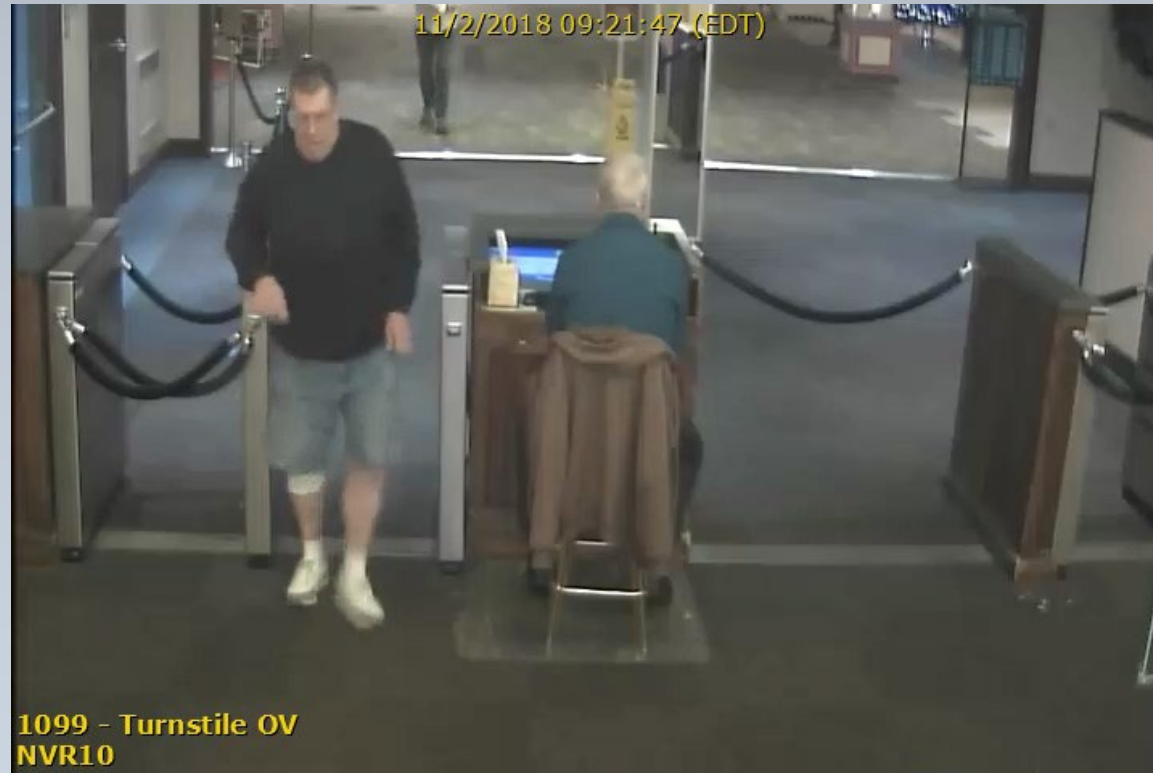
March 14, 2019, Carlisle, OH Peoples Bank

An employee at the casino recognized photos of the suspect being shared in local media as Lunsford, a frequent patron at Hollywood casino. Indiana Gaming Commission Agents at the riverboat were made aware that the robbery suspect resembled Lunsford. Lunsford was found gaming on the casino floor by IGC Enforcement Agents, who took him into custody.

Surveillance
Security
ID Scanner
Player Tracking

Mark Lunsford, pleaded guilty to three counts of robbery and was sentenced to ten years in prison. The robberies occurred between 2016 and 2019.

Winchester, IN – Homicide Investigation



1099 - Turnstile OV
NVR10

ISP Detectives were looking for unknown suspect in a homicide occurring in Winchester, IN. An ATM cash transaction with, victim's card, in Rising Sun, IN was conducted.

ISP Detectives contacted the Rising Star IGC office and requested assistance in possibly identifying suspect.

Other Crimes

November 10, 2012, in Indianapolis, IN, the Richmond Hill subdivision, a plot to collect on a \$300,000.00 home insurance policy resulted in an explosion that killed the two neighbors and caused an estimated \$4 million in property damage.



Mark Leonard and Monserrate Shirley were at Hollywood casino at the time of the explosion.

Resources

- SAR Review Teams in Southern Judicial and Northern Judicial District of Indiana.
- FBI
- DEA
- IRS
- US Attorney
- County Prosecutors
- State Police
- County Sheriff
- Local Police
- HIDTA
- Gang Task Force
- IDOR
- Indiana Workforce Development
- USPIS



Questions



Contact Information

Indiana Gaming Commission 317-233-0046

Gaming Integrity Division

- Director Frank Brady 317-690-4209 Fbrady@igc.in.gov
- Investigator Bill Peevler 765-505-8187 Bpeevler@igc.in.gov
- Investigator Manuel Becker 812-483-5770 – Mbecker@igc.in.gov