



Human Trafficking Typologies

For Gambling Operators

Gambling Supervision Commission
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Gambling Typologies

1.

Mule

After minimal play, money is transferred out into a bank account which does not match the details of the gambling account. It is then transferred (layered) between accounts in various names all recently opened.



2.

Offshore

A money launderer sets up a company in an offshore jurisdiction through various frontmen. The company then applies for an online gambling licence in the offshore jurisdiction.

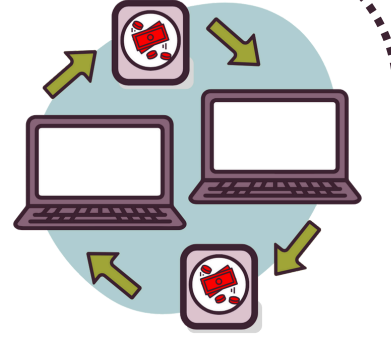
Vulnerable people are drawn to another country to work for the legitimate gambling company, only to be trafficked into alternative illegal employment such as online scam 'farms'. Funds deriving from HT and other criminal activity are then laundered through the online gambling website which is controlled by the launderer.



3.

Beneficial Ownership

A criminal colludes with other persons who act as beneficial owners of a company which is used to obtain an online gambling licence. Illegally obtained funds originating from HT are then co-mingled with the legitimate profits of the company and deposited in a bank account.



4.

Minimal Play

A Trafficker uses gambling accounts to conceal funds collected from HT. They engage in minimal play, often using cash or playing just below thresholds, in order to avoid reaching KYC thresholds. The funds are then pulled out as "clean" money in order to conceal the predicate offence.



5.

Stolen ID

Illegally obtained funds are deposited into an online gambling account using a false identity. The player engages in minimal gambling activity which is sufficient to make the account appear genuine. After incurring minimal losses the funds are then transferred from the gambling account to a legitimate bank account.



6.

Front for Cyber-enabled Fraud Operation

The illicit funds accumulated through fraud / Human Trafficking can be laundered through the business to business method, and proceeds funnelled through non-gambling companies linked to a licence holder.



NOTE.

Regularly check adverse media and typology reports, such as UNODC reports, highlighting emerging risks.