



Terrorist Financing Red Flags

For Gambling Operators

Updated October 2025

Gambling Supervision Commission
Ground Floor, St George's Court
Myrtle Street
Douglas
Isle of Man
IM1 1ED

Red Flag Indicators - Terrestrial

1.



Bad Key Words

Saying extreme or unusual things, such as showing intent to harm others.

2.

No Source of Funds

Source of Funds not provided as the player has excluded themselves.

3.

Sanctioned

Player identified as a sanctioned individual or associated with a sanctioned individual.

4.



Suspicious SOF

Source of funds being deposited into the account appears to be suspicious and it is not possible to identify the source of the funds.

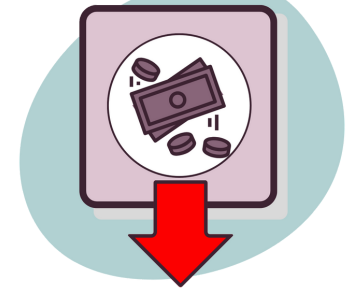
5.



Fake IDs

Use or attempted use of fake IDs (invalid/uncommon documents) or IDs that don't belong to the individual presenting the document.

6.



Smurfing

Smurfing – placing frequent smaller bets across different betting accounts (collusion) or different betting shops to avoid the threshold.

7.

Odd Behaviour

Customer's behaviour acting mysterious/suspicious i.e. 'shifty' – or out of character for a regular customer – could be using stolen money, fake ID, been coerced into placing a bet

8.

Bribery

Customers attempting to bribe, influence, or conspire an employee to avoid requesting CDD or further verification documentation

9.



Higher Risk Jurisdictions

Customers from higher-risk jurisdictions spending large amounts of cash

NOTE.

Regularly check adverse media and typology reports, such as UNODC reports, highlighting emerging risks.
[View the 2025 Isle of Man Terrorist Financing NRA](#)

Red Flag Indicators - OGRA

1.

Many Cards

Unusual numbers of cards or payment types being used against one account.



2.

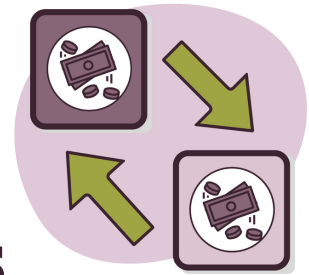
Re-opened

The player has links to previously investigated accounts.

3.

Chargebacks

Chargebacks against multiple cards.



4.

Shared Bank Details

Different players are identified as sharing bank accounts from which deposits or withdrawals are made.

5.

Sanctions

The player is situated in a higher-risk jurisdiction or is identified as being listed on a sanctions list.



6.

Bad Key Words

Chat board monitoring by the e-gaming company picking up key words and evidence of groups conspiring.



7.

Suspicious SOFs

The source of funds being deposited into the account appears to be suspicious and it is not possible to verify the origin of the funds.

8.

Fake IDs

Use or attempted use of fake KYC documentation such as fake IDs that don't belong to the individual presenting the document.



9.

It's a PEP

The player is identified as a politically exposed person.



10.

Withdrawals

The withdrawals from the account are not commensurate with the conduct of the account, such as for instance where the player makes numerous withdrawals without engaging in significant gambling activity.



11.

Smurfing

Smurfing – placing frequent smaller bets across different betting accounts.



12.

Adverse Media

Adverse media found in relation to a player account.



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