



kompli-global[®]
Deeper Due Diligence

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Industry sector type

Gambling

Client description

World top 10 ranked gaming operator. UK-based - regulated & licensed by UKGC. Provides international online and land-based casino operations.

Due diligence target subject

A 'high-roller' individual customer.

Kompli-Global service(s) utilised

kompli-TMinsight

Service description

Kompli-Insight provides human interactive research and investigation to deliver a written Customer Due Diligence (CDD) report on a target subject. Insight reports are available in many languages as well as in English. Investigative research is conducted in the native language by local compliance experts from our advisory community located in 66 countries, covering 158 regions.

Background

The client wanted to undertake CDD on an individual gaming player who was regularly depositing significant sums of money as an immediate source of funding. The client was keen to initially conduct CDD on its VIP 'high-rollers' to gain insight into their backgrounds and possible source of funds.

The client instructed Kompli-Global to provide a CDD report, which uncovered the following information:

- The target subject was employed part-time as a Lunchtime Supervisor at a primary school.
- Kompli-Global established that the salary for this position was < £20,000 per annum.
- The target subject did not own their own home, but rented it from a local housing association in North London.
- The monthly residential rental was ~£2,000 per month, leaving the subject little disposable income.
- The target subject lived with her husband who was unemployed and her son who worked as a van driver.
- The player, relatives and close associates' social media presence was inconsistent with that of a wealthy family.

The consequences

As a result of the Kompli-Insight intelligence, the client is considering its options, including closing the subject's account and filing a Suspicious Activity Report (SAR) with the NCA. This is because the funds being deposited by the player are inconsistent with their social status and income. Their gaming activity may be funded from the proceeds of crime or laundering money on behalf of a third party.

Conclusion

Kompli-Global provided significant intelligence that was material to the client's risk based approach.