

# Anti-Money Laundering (AML) Policy

Golden Ticket Online Arcade

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## 1. Introduction

Golden Ticket Online Arcade is committed to preventing money laundering, fraudulent activities, and the misuse of its platform. This Anti-Money Laundering (AML) Policy outlines the procedures and guidelines that ensure compliance with applicable laws and regulatory requirements.

## 2. Purpose of AML Compliance

The purpose of this policy is to:

- Detects and prevents money laundering and fraudulent transactions.
- Ensure compliance with applicable U.S. anti-money laundering laws, including the **Bank Secrecy Act (BSA)** and **USA PATRIOT Act**.
- Prevent the use of the platform for illegal activities such as fraud, terrorism financing, or identity theft.
- Maintain the integrity of Golden Ticket Online Arcade and Casino's sweepstakes system.

## 3. Customer Due Diligence (CDD) & Know Your Customer (KYC)

Golden Ticket Online Arcade implements **Know Your Customer (KYC)** verification to identify and verify all participants engaging in financial transactions, including:

### A. Required Customer Information:

- **Full legal name** (as shown on a government-issued ID).
- **Date of birth** (must be at least 21 years old or the legal age in their jurisdiction).
- **Residential address** (proof of address may be required).
- **Valid government-issued ID** (driver's license, passport, or state ID).
- **Payment method verification** for transactions related to sweepstakes participation and redemptions.

## **B. Enhanced Due Diligence (EDD):**

For users flagged as high-risk, additional verification measures may be required, such as:

- Submission of additional proof of identity and address.
- A video verification process to confirm identity.
- Proof of source of funds for significant transactions.

## **4. Transaction Monitoring & Suspicious Activity Reporting**

Golden Ticket Online Arcade actively monitors all transactions and player behavior to detect unusual activity. Transactions may be flagged if they meet any of the following criteria:

### **A. Unusual Transaction Patterns:**

- Rapid deposits and withdrawals without gameplay activity.
- Frequent redemptions that do not align with normal sweepstakes behavior.
- Transactions just below reporting thresholds to avoid detection.

### **B. Use of Multiple Accounts:**

- Creating multiple accounts to manipulate sweepstakes participation or redemption limits.
- Transferring funds or virtual currency between linked accounts.

### **C. High-Risk Jurisdictions:**

- Transactions originating from, or linked to, high-risk countries identified by the **Financial Action Task Force (FATF)**.

### **D. Use of Third-Party Payment Methods:**

- Attempting to process transactions through accounts not in the player's name.
- Use of unauthorized credit cards, bank accounts, or digital wallets.

### **E. Suspicious Activity Reporting (SAR):**

Golden Ticket Online Arcade may file a **Suspicious Activity Report (SAR)** with **FinCEN** or relevant authorities if:

- A player's activity suggests potential money laundering or fraud.
- Transactions involve large sums inconsistent with normal sweepstakes play.
- False or misleading information is provided during verification.

## 5. Prohibited Activities

The following activities are strictly prohibited on Golden Ticket Online Arcade:

- **Money laundering** – Attempting to use the platform to disguise the origin of illicit funds.
- **Fraudulent activity** – Use of stolen payment methods or unauthorized transactions.
- **Use of VPNs or Proxy Services** – Attempting to access the platform from restricted jurisdictions.
- **Third-Party Payments** – Using another person's account or financial information for transactions.

## 6. Free Entry Methods & Compliance

Golden Ticket Online Arcade operates legally as a sweepstakes-based platform and provides **Alternative Methods of Entry (AMOE)** to comply with applicable laws. Users can obtain **Sweeps Coins (SC)** through:

- **Postal mail requests** without any purchase requirement.
- **Social media giveaways** or other free promotional methods.
- **Daily login bonuses**, allowing participants to receive free SC.

No purchase is ever required to participate in the sweepstakes, ensuring compliance with sweepstakes regulations.

## 7. Record-Keeping & Compliance Reporting

Golden Ticket Online Arcade maintains **transaction records and user verification data** for a minimum of **five (5) years** to comply with AML regulations. The platform may provide records to regulatory authorities when legally required.

## 8. Account Freezing & Termination

Golden Ticket Online Arcade reserves the right to:

- Freeze accounts suspected of engaging in suspicious activity.
- Reject transactions that fail to meet AML compliance requirements.
- Permanently suspend accounts involved in fraudulent behavior or financial crimes.

## 9. Employee AML Training & Internal Controls

All staff members involved in financial transactions or player verification are trained to:

- Identify potential money laundering activities.
- Properly handle **KYC verification** and **reporting processes**.
- Escalate **suspicious activity reports** to the appropriate authorities.

## 10. Refunds & Transaction Reversals

Golden Ticket Online Arcade maintains a strict policy that purchases of Gold Coins are generally final and non-refundable except where required by applicable law, in cases of unauthorized transactions, payment processing errors, or where otherwise determined necessary for compliance or fraud prevention. Transactions identified as originating from restricted or Excluded Territories may be voided and refunded, subject to applicable administrative and payment processing fees. All refund requests and transaction reviews are handled in accordance with the Platform's Refund Policy and applicable AML and fraud prevention requirements.

## 11. Contact Information for AML Inquiries

For any AML-related inquiries, users may contact:

- **Email:** [compliance@gtocard.com](mailto:compliance@gtocard.com)
- **Phone:** 702-356-3435

Golden Ticket Online Arcade is committed to upholding the highest standards of integrity and compliance to ensure a **fair, transparent, and legally compliant** sweepstakes gaming environment.

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