

Written by Administrator
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The U.S. Department of Treasury issued a record \$75 million fine on a Pacific Island casino, alleging it committed “willful and egregious violations” of the Bank Secrecy Act.

Treasury’s Financial Crimes Enforcement Network, or FinCEN, announced late Wednesday that it imposed the civil fine on the Tinian Dynasty Hotel and Casino, located on Tinian, one of the Northern Mariana Islands, breaking the \$10 million record penalty on a casino it reached in March when [targeting](#) the Trump Taj Mahal.

The casino failed to develop and implement an anti-money laundering program, and no member of its staff was responsible for day-to-day compliance with the Bank Secrecy Act, FinCEN said. Casino workers were not trained in record-keeping, or in identifying, monitoring or reporting suspicious activity, it said.

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“Tinian Dynasty didn’t just fail to file a few reports,” said FinCEN Director Jennifer Shasky Calvey, [in a statement](#) .

A 158-count criminal indictment, filed in 2014 in Saipan, charged the casino and its owners with, among other things, 156 charges of failing to file currency transaction reports and failure to maintain an anti-money laundering program. On Monday, a federal judge rejected a motion by the casino to dismiss the charges.

Bruce Berline, a lawyer representing the casino and its owners in the criminal case, declined to comment. Representatives of the casino didn’t respond to a request for comment.

Before the indictment, Tinian Dynasty had never filed a single suspicious activity report, FinCEN said.

FinCEN, in August 2014, [fined](#) George Que, a former VIP services manager at Tinian Dynasty, \$5,000, and barred him from working at financial institutions.

Tinian Dynasty accommodated patrons seeking to conduct large transactions without the casino reporting them, FinCEN alleged. Alluding to the criminal investigation, FinCEN said undercover agents told casino staff they planned to gamble with large amounts of money and asked Tinian Dynasty not to report their transactions.

In some instances, Tinian Dynasty employees “provided detailed instructions” for patrons to conduct transactions without being reported to the U.S. government, or to attract scrutiny from law enforcement, FinCEN said.

In one case, FinCEN alleged, a casino VIP manager assured an undercover agent, posing as a representative of a Russian businessman, that his client could bring large amounts of money and the casino wouldn’t report on his transactions.

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The VIP manager advised undercover agents that whenever they did business in the U.S., Australia and New Zealand, they should keep their transaction amounts below \$10,000, which he called the “magic number” that would trigger a currency transaction report, FinCEN said. Further, FinCEN cited the manager saying several transactions made at \$9,900 would “appear suspicious.”

Law enforcement agents found a stack of more than 2,000 unfiled currency transaction reports during a 2013 search of the casino, FinCEN said, noting that the casino’s auditor said he assumed filing them was a “low priority,” because “nobody ever noticed that they were not being filed.”

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