

UNITED STATES DEPARTMENT OF THE TREASURY



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FinCEN Bars Casino Official from the Financial Industry

VIP Services Manager Helped Customers Avoid BSA Reporting

WASHINGTON, DC – The Financial Crimes Enforcement Network (FinCEN) has reached an agreement with Mr. George Que, the former VIP Services Manager at the Tinian Dynasty Hotel & Casino in the Northern Mariana Islands, to permanently bar him from working in financial institutions as a result of his willful violations of the Bank Secrecy Act (BSA). Mr. Que also agreed to a [civil monetary penalty](#) for these violations.

For at least a year, Mr. Que helped high-end gamblers avoid detection of large cash transactions by agreeing not to file either Currency Transaction Reports (CTRs) or Suspicious Activity Reports (SARs) that were required under the BSA. During a criminal investigation undercover agents, posing as casino patrons, told Mr. Que that they planned to gamble large amounts of money, and expressly requested that the casino not report their gaming transactions. Among other instances, on May 3, 2012, Mr. Que assured an undercover agent, posing as the representative of a Russian businessman, that his client could bring large amounts of currency to the casino and gamble, and that the casino would not file reports.

“There is nothing wrong with a casino being hospitable to its clients,” noted FinCEN Director Jennifer Shasky Calvery. “However, there is everything wrong when a casino – or a casino official – facilitates the unlawful activities of these clients, and agrees to look the other way. Today’s enforcement action not only stresses the importance of the culture of compliance, but also ensures that Mr. Que will not have the opportunity to engage in similar misconduct in the future.”

Mr. Que has admitted that his conduct violated the Bank Secrecy Act. He consented to an undertaking in which he agreed to permanently cease participating, directly or indirectly, in the conduct of the affairs of any financial institution that is located within the United States or that conducts business within the United States and agreed to the assessment of a \$5,000.00 civil money penalty.

FinCEN's investigation into the activities of Tinian Dynasty Hotel & Casino is continuing.

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FinCEN's mission is to safeguard the financial system from illicit use and combat money laundering and promote national security through the collection, analysis, and dissemination of financial intelligence and strategic use of financial authorities.