
From: Pat.Agnellini@marina.trump.com
Sent: Monday, May 22, 2006 7:06 PM
To: Comments, Regulation
Subject: RIN 1506-AA84

Please accept the following comments on behalf of Trump Entertainment Resorts, Inc. with respect to the above referenced RIN.

(i) Bills inserted into electronic gaming devices - 103.22(b)(2)(i)(I). This proposal would require a casino to track all cash inserted into a slot machine and aggregate that cash and if the reporting threshold is reached, generate a CTR. First, unlike a gaming table or cage window, no human interaction occurs with this type of transaction. Therefore, since the tracking system does not currently differentiate between cash, token, coin, ticket or promotional coupon, it would be impossible to delineate how much of the "coin-in" was actually cash. Second, assuming a software programming fix would allow this tracking to occur, the cost in manpower to monitor and interact with patrons would be significant. Finally, we believe this process would be so cumbersome because of the magnitude of bills that would have to be individually inserted and the number of times tickets would have to be cashed to avoid the possibility of a Suspicious Activity Report, that it would not be a conduit for money laundering and therefore, any minimal benefit would be dramatically outweighed by the cost of any potential programming fix.

(ii) Tickets and other gaming instruments - 103.22(b)(ii)(A). This proposal would require a casino to track the dollar amount of tickets redeemed and aggregate those tickets and if the reporting threshold is reached, generate a CTR. Again, unlike a table game or cage window, the process of cashing out a ticket does not involve any human interaction if done at a ticket redemption machine. Since the tickets are not identified to any particular individual, a casino has no way of knowing who has cashed out a ticket at a ticket redemption machine.

For the foregoing reasons, we respectfully request that these amendments not be implemented. If you have any questions or would like to discuss these points in more detail, please do not hesitate to contact me. Thank you for your time.

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5/24/2006