



Last week, the Financial Crimes Enforcement Network (FinCEN) [permanently barred](#) former casino staffer George Que from working at financial institutions for willfully violating the reporting requirements of the Bank Secrecy Act (BSA).

Que, the former VIP Services Manager at the Tinian Dynasty Hotel & Casino in the Northern Mariana Islands, also agreed to pay a [\\$5,000 civil monetary penalty](#) in connection with these violations. According to FinCEN, Que helped high-end gamblers avoid detection of large cash transactions by agreeing not to file the Currency Transaction Reports (CTRs) or Suspicious Activity Reports (SARs) required by the BSA. During a criminal investigation, Que assured an undercover agent posing as a representative of a Russian businessman that the casino would not file the reports if his client brought large amounts of money to the casino. While FinCEN's

investigation into Tinian Dynasty is on-going, Director Jennifer Shasky Calvery noted that the ban and fine levied against Que reflect the "importance of the culture of compliance." FinCEN recently expounded upon this theme in a [six-page regulatory Advisory](#) aimed at financial institutions subject to the anti-money laundering statutes, which can include not only traditional banking entities, but money services businesses, broker-dealers, insurance companies, and those, like Tinian Dynasty, in the gaming industry. The regulatory Advisory highlights several general principles for improving and strengthening organizational compliance with the BSA, including the importance of information sharing, adequate resource allocation, and leadership investment and support. By incorporating these guidelines, financial institutions can foster a strong culture of compliance and avoid gambling with civil and criminal enforcement penalties.

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