

**UNITED STATES OF AMERICA  
DEPARTMENT OF THE TREASURY  
FINANCIAL CRIMES ENFORCEMENT NETWORK**

**IN THE MATTER OF  
RIVERBOAT CORPORATION OF MISSISSIPPI**

**MATTER No. CAS-99-004**

**AGREEMENT**

**I.**

This AGREEMENT is by and between the United States Department of the Treasury, Financial Crimes Enforcement Network ("FinCEN") and Riverboat Corporation of Mississippi, d/b/a Isle of Capri Casino - Biloxi ("ICCB"), pursuant to 31 U.S.C. § 5321(a)(1) of the Bank Secrecy Act and 31 C.F.R. § 103.47(f), thereunder.

**II.**

Between January 1 through December 31, 1993, ICCB failed to file at least 44 Currency Transaction Report by Casinos ("CTRC") forms for currency transactions in an amount greater than \$10,000 within the time required by 31 C.F.R. § 103.22, promulgated under § 5313 of the Bank Secrecy Act.

**III.**

FinCEN has determined that in failing to file the CTRCs as described in Paragraph II, above, ICCB willfully violated the currency reporting provisions of the Bank Secrecy Act. Therefore, FinCEN has determined to assess a civil money penalty pursuant to 31 U.S.C. § 5321 and 31 C.F.R. § 103.47(f).

**IV.**

In order to resolve this controversy between the parties, and without admitting or denying the facts in Paragraph III, above, or admitting or denying liability under the Bank Secrecy Act, ICCB consents to payment of a civil money penalty in the amount of \$227,500.

## V.

ICCB agrees to pay the amount of \$227,500 within five (5) business days of the date of final and complete execution of this AGREEMENT in order to comply with the civil money penalty assessment by FinCEN. Such payment shall be:

- a. made by certified check, bank cashier's check or bank money order;
- b. made payable to the United States Department of Treasury;
- c. hand-delivered or sent by overnight mail to Nicholas A. Procaccini, Assistant Director, Office of Management and Chief Financial Officer, FinCEN, P.O. Box 39, Vienna, Virginia 22183;  
and
- d. submitted under a cover letter, which references the caption and file number in this matter.

## VI.

ICCB recognizes and states that it enters into this AGREEMENT freely and voluntarily, and that no offers, promises, or inducements of any nature whatsoever have been made by FinCEN or any employee, agent, or representative of FinCEN to induce ICCB to enter into this AGREEMENT, except for those specified in this Agreement.

## VII.

ICCB understands and agrees that this AGREEMENT embodies the entire agreement between ICCB and FinCEN relating to the assessment of civil money penalties under the Bank Secrecy Act. ICCB further understands and agrees that there are no express or implied promises, representations, or agreements between ICCB and FinCEN other than those expressly set forth or referred to in this document and that nothing in this document is binding on any other agency of government, whether federal, state, or local.

This Agreement constitutes a complete settlement of civil liability of ICCB for any reporting violations of the Bank Secrecy Act, and the regulations promulgated thereunder, which were identified by FinCEN in its letter to ICCB dated June 24, 1998.

Nothing in this Agreement shall preclude any proceedings brought by FinCEN to enforce the terms of this Agreement, nor shall it constitute a waiver of any right, power, or authority of any other representatives of the United States or agencies thereof, including the Department of Justice, to bring other actions deemed appropriate.

VIII.

ICCB waives any claim of double jeopardy or estoppel based upon this AGREEMENT, including the payment of any civil money penalty.

Riverboat Corporation of Mississippi, d/b/a Isle of Capri Casino - Biloxi

BY: //signed// Allan B. Solomon

TITLE: Executive V/P

DATED: 9/28/99

On this 28<sup>th</sup> day of September, 1999, Allan B. Solomon, a duly authorized officer of Riverboat Corporation of Mississippi, d/b/a Isle of Capri Casino - Biloxi, being known to me and who executed the foregoing AGREEMENT personally appeared before me and did duly acknowledge to me that he executed the same. Witness by hand and official seal.

//notarized// Official Seal/Darlene Frazer  
Notary Public, State of Illinois

Notary Public

FINANCIAL CRIMES ENFORCEMENT NETWORK

BY: //signed// James F. Sloan

TITLE: Director

DATED: 9/30/99