



Financial Crimes Enforcement Network

A bureau of the U.S. Department of the Treasury

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FOR IMMEDIATE RELEASE

July 1, 2009

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FinCEN Advisory: Structuring by Casino Patrons and Personnel New Information Prompts Advisory

VIENNA, Va. — The Financial Crimes Enforcement Network (FinCEN) today issued an [advisory](#) on apparent structuring by casino patrons and personnel. Structuring is described as breaking up transactions for the purpose of evading Bank Secrecy Act (BSA) reporting or recordkeeping requirements.

“Structuring is unlawful, and involves potential civil and criminal penalties under the BSA,” said FinCEN Director James H. Freis, Jr. “Each sector of the financial industry with BSA responsibilities plays an important role in defending our financial system from criminal abuse. The timely and accurate reporting of structuring, under the BSA, is a vital tool in law enforcement's arsenal against financial crime.”

FinCEN recently received information from law enforcement and regulatory authorities that raises concerns about the current level of compliance with the obligations to guard against structuring.

The BSA requires casinos to implement a compliance program, file reports, and maintain certain records. A casino's compliance program must be reasonably designed to manage the risk of illicit activity and ensure compliance with BSA requirements, including an obligation to detect and report evidence of structuring violations on FinCEN Form 102, Suspicious Activity Report by Casinos and Card Clubs. BSA reports and records are highly useful in criminal, tax, or regulatory investigations or proceedings.

The advisory is available on www.FinCEN.gov.

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The mission of the Financial Crimes Enforcement Network is to safeguard the financial system from the abuses of financial crime, including terrorist financing, money laundering, and other illicit activity. We achieve this mission by: administering the Bank Secrecy Act; supporting law enforcement, intelligence, and regulatory agencies through sharing and analysis of financial intelligence; building global cooperation with our counterpart financial intelligence units; and networking people, ideas, and information.