

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

**IN THE MATTER OF  
GREENVILLE RIVERBOAT, LLC  
d/b/a LIGHTHOUSE POINT CASINO**

**No. 2003-03**

**ASSESSMENT OF CIVIL MONEY PENALTY**

**I. INTRODUCTION**

The Secretary of the United States Department of the Treasury has delegated to the Director of the Financial Crimes Enforcement Network (“FinCEN”) the authority to determine whether a financial institution has violated the Bank Secrecy Act, 31 U.S.C. §§5311 *et seq.* and 31 CFR Part 103 thereunder (“BSA”), and what, if any, sanction is appropriate.

In order to resolve this matter, and only for that purpose, Greenville Riverboat, LLC, d/b/a Lighthouse Point Casino (“Greenville” or “the Casino”) has entered into a CONSENT TO THE ASSESSMENT OF CIVIL MONEY PENALTY without admitting or denying FinCEN’s determinations described in Paragraphs III and IV below, except as to jurisdiction in Paragraph II below, which is admitted.

Greenville’s CONSENT TO THE ASSESSMENT OF CIVIL MONEY PENALTY, dated May 15, 2003, is incorporated herein by this reference.

**II. JURISDICTION**

Greenville, located in Greenville, Mississippi, is and was at all relevant times, a casino licensed by the state of Mississippi. Greenville is a “financial institution” within the meaning of 31 U.S.C. §5312(a)(2) and 31 CFR 103.11(n) of the BSA. Greenville had gross gaming revenue of approximately \$37 million for calendar year 2002.

**III. FINCEN’S DETERMINATIONS**

**A. Failure to File Currency Transaction Reports**

FinCEN has determined that from January 1, 1997, through July 31, 2002, Greenville willfully failed to file Currency Transaction Reports by Casino (“CTRC”) forms for 142 currency transactions exceeding \$10,000, as required by 31 U.S.C. §5313 and 31 CFR 103.22 of the BSA.<sup>1</sup>

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<sup>1</sup> The Internal Revenue Service (“IRS”) identified 81 failures to file CTRCs in an examination of Greenville. Greenville identified 61 failures to file CTRCs as the result of an internal audit of the period following the IRS examination. In addition, Greenville identified 19 transactions for which Greenville was required to amend a previously filed CTRC.

B. Compliance Program Violations

FinCEN has determined that Greenville failed to implement adequately a written compliance program reasonably designed to assure and monitor compliance with the requirements of the BSA, in violation of 31 U.S.C. §5318(h) and 31 CFR 103.64(a), and failed to implement internal controls to assure compliance with the BSA, as required by 31 CFR 103.64(a)(2)(i).

Although Greenville had a written compliance program, that program was not effectively implemented at the Casino. For example, the compliance program required weekly reviews and approvals of CTRCs by Greenville's Controller and tri-monthly preparation of CTRC mailing packages to the Internal Revenue Service – Detroit Computing Center. However, these procedures were not followed.

Greenville also failed to use available automated data processing systems to assure compliance with the BSA, as required by 31 CFR 103.64(a)(2)(vi). For example, although the Casino generated computer cage reports on a daily basis, these reports were not used to file timely, complete, and accurate CTRCs under the BSA.

C. Willful Violations

FinCEN has determined that Greenville willfully violated the BSA. Greenville failed to implement essential elements of its BSA program in a manner designed to assure compliance. In fact, no CTRCs were filed for almost two years. Therefore, Greenville knew, or was reckless in not knowing, that its BSA compliance program had not been implemented, or was not effective, and that CTRCs were not filed in a timely and accurate manner.

IV. CIVIL MONEY PENALTY

FinCEN has determined that by failing to file CTRCs and failing to implement an adequate compliance program as described in Paragraph III above, Greenville willfully violated the currency reporting and compliance program provisions of the BSA and a civil money penalty is due pursuant to 31 U.S.C. §5321 and 31 CFR 103.57(f).

V. ASSESSMENT AGAINST GREENVILLE

THEREFORE, the Department of the Treasury assesses against Greenville a civil money penalty of \$350,000.

By its execution of its CONSENT, Greenville, without admitting or denying FinCEN's determinations described in Paragraphs III and IV above, except as to jurisdiction in Paragraph II, which is admitted, consents to the assessment of a civil money penalty in the sum of \$350,000.

Greenville shall, under the terms of its CONSENT:

