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for the Northern Mariana Islands
By _____
(Deputy Clerk)

9 Attorneys for the United States of America

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN MARIANA ISLANDS

12 UNITED STATES OF AMERICA,
13
14 Plaintiff,

15 vs.

16 HONG KONG ENTERTAINMENT
17 (OVERSEAS) INVESTMENTS, LTD.
18 dba TINIAN DYNASTY HOTEL & CASINO,
19 TIM BLYTHE, and GEORGE QUE,
20 Defendants.

CRIMINAL CASE NO.

COMPLAINT

**CONSPIRACY TO CAUSE A FINANCIAL
INSTITUTION TO FAIL TO FILE A
CURRENCY TRANSACTION REPORT**
[18 U.S.C. § 371]
(Count 1)

**CAUSING A FINANCIAL INSTITUTION
TO FAIL TO FILE A CURRENCY
TRANSACTION REPORT**
[31 U.S.C. §§ 5324(a)(1) and (d)(2);
and 18 U.S.C. §2]
(Counts 2 to 10)

NOTICE OF FORFEITURE
[31 U.S.C. § 5317(c)]

21 THE UNDERSIGNED COMPLAINANT CHARGES UPON INFORMATION AND BELIEF
22 THAT:
23
24

(Count 1)

**CONSPIRACY TO CAUSE A FINANCIAL INSTITUTION TO FAIL
TO FILE A CURRENCY TRANSACTION REPORT**

At all times material to this Complaint:

The Bank Secrecy Act

1. The Bank Secrecy Act (“BSA”), codified at 31 U.S.C. §§ 5313-5326, was a set of laws and regulations enacted by Congress to address an increase in criminal money laundering through financial institutions.

2. Casinos qualified as financial institutions within the meaning of BSA.

3. One of the BSA mechanisms to uncover criminal activity conducted through casinos was a requirement that casinos file a “Currency Transaction Report for Casinos” (“CTR”), Financial Crimes Enforcement Network (“FinCEN”) Form 103 or its electronic equivalent, with the Department of the Treasury, for any transaction involving more than \$10,000 in currency.

4. CTRs were filed with the FinCEN, a bureau of the Department of the Treasury.

5. A CTR consisted of three parts. Part I required the financial institution to verify and accurately record the name and address of the individual who conducted a reportable currency transaction, as well as to accurately record the identity, social security number, or taxpayer identification number of any person or entity on whose behalf the currency transaction was conducted. Part II required the financial institution to record the date, the amount of the transaction, and the form of the transaction. Part III required the name of the financial institution where the transaction occurred, the person completing the CTR, and the person approving the completion and filing of the CTR.

6. Beginning on or about May 3, 2012, the Internal Revenue Service – Criminal Investigation (“IRS-CI”) initiated an undercover operation to investigate possible illegal

1 activities at defendant, HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS,
2 LTD. dba TINIAN DYNASTY HOTEL & CASINO. Two IRS-CI undercover agents (“UCA-1”
3 and “UCA-2”) assisted in the undercover operation and posed as gamblers willing to use large
4 amounts of U.S. currency but not wanting any reports filed.

5 The Defendants

6 7. Defendant HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS,
7 LTD. dba TINIAN DYNASTY HOTEL & CASINO (sometimes referred to here as
8 “TDHC” or “TINIAN DYNASTY HOTEL & CASINO”) was a corporation organized under the
9 laws of the Commonwealth of the Northern Mariana Islands and located at One Broadway,
10 Tinian, Commonwealth of the Northern Mariana Islands. TDHC operated a casino located in
11 Tinian, Commonwealth of the Northern Mariana Islands.

12 8. Defendant TIM BLYTHE was the Casino Manager of the TDHC.

13 9. Defendant GEORGE QUE was a VIP Services Manager of the TDHC.

14 The Object of the Conspiracy

15 10. Beginning on or about September 2009, the exact date unknown, and continuing up
16 to and including the present date, in the District of the Northern Mariana Islands and elsewhere,
17 defendants HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba
18 TINIAN DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, together with
19 others unknown, knowingly conspired to commit the following offense against the United States:
20 knowingly and for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a), and
21 regulations prescribed thereunder, causing and attempting to cause defendant HONG KONG
22 ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN DYNASTY HOTEL
23 & CASINO, a domestic financial institution, to fail to file reports required under 31 U.S.C. §
24

1 5313(a), specifically, Currency Transaction Reports for Casinos – FinCEN Forms 103 or their
2 electronic equivalent, in violation of 31 U.S.C. §§ 5324(a)(1) and (d)(2).

3 A. The Manner and Means of the Conspiracy

4 11. From at least on or about September 2009 to the present, defendant HONG KONG
5 ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN DYNASTY HOTEL
6 & CASINO engaged in a pattern of accommodating gamblers to conduct transactions involving
7 more than \$10,000 in currency, without filing CTRs with FinCEN.

8 12. Defendants TIM BLYTHE and GEORGE QUE did not file any CTRs on such
9 transactions or cause anyone else to do so, even though they were well aware of such reporting
10 requirement.

11 B. Overt Acts

12 13. In furtherance of the conspiracy, and to accomplish its object, defendants HONG
13 KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN
14 DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, together with others
15 unknown, committed and caused to be committed the following overt acts, among others, in the
16 District of the Northern Mariana Islands:

17 a. On or about May 3, 2012, during a telephone conversation, GEORGE QUE
18 assured UCA-1 that a Russian businessman whom UCA-1 said he was representing could bring
19 and gamble with large amounts of currency, and TINIAN DYNASTY HOTEL & CASINO
20 would not file paperwork relating to such cash transactions.

21 b. On or about September 11, 2012, during a telephone conversation, GEORGE
22 QUE assured UCA-1 that despite any pending change in the ownership of TINIAN DYNASTY
23 HOTEL & CASINO, the casino's staff and management would remain the same, and the casino
24

1 would not create paperwork if UCA-1 desired to conduct large cash transactions at the casino.

2 c. On or about February 28, 2013, at the TINIAN DYNASTY HOTEL &
3 CASINO, GEORGE QUE assisted UCA-1 in purchasing a casino voucher in the name of UCA-2
4 for \$30,000 in U.S. currency. The TINIAN DYNASTY HOTEL & CASINO accepted that cash
5 and did not file a CTR-C report related to that transaction.

6 d. On or about February 28, 2013, at the TINIAN DYNASTY HOTEL &
7 CASINO, GEORGE QUE assisted UCA-2 in purchasing a casino voucher for \$15,000 in U.S.
8 currency. The TINIAN DYNASTY HOTEL & CASINO accepted that cash and did not file a
9 CTR-C report related to that transaction.

10 e. On or about February 28, 2013, at the TINIAN DYNASTY HOTEL &
11 CASINO, UCA-1 purchased a casino voucher in the name of UCA-2 for \$40,000 in U.S.
12 currency. The TINIAN DYNASTY HOTEL & CASINO accepted that cash and did not file a
13 CTR-C report related to that transaction.

14 f. On or about February 28, 2013, at the TINIAN DYNASTY HOTEL &
15 CASINO, GEORGE QUE provided UCA-1 and UCA-2 with casino chips at a blackjack table.

16 g. On or about February 28, 2013, before UCA-1 and UCA-2 left the TINIAN
17 DYNASTY HOTEL & CASINO, GEORGE QUE suggested that they exchange their casino
18 chips for a voucher which could then be exchanged for a casino check on their next visit.
19 UCA-1 and UCA-2 gave their vouchers and casino chips to GEORGE QUE in exchange for a
20 voucher in the name of UCA-1 for \$60,000 in U.S. currency and \$16,500 in U.S. currency. The
21 TINIAN DYNASTY HOTEL & CASINO conducted such transactions and did not file a CTR-C
22 report related to the \$16,500 cash transaction.

23 h. On or about March 2, 2013, at the TINIAN DYNASTY HOTEL & CASINO,
24

1 UCA-1 purchased a casino voucher in the name of UCA-2 for \$60,000 in U.S. currency. The
2 TINIAN DYNASTY HOTEL & CASINO accepted that cash and did not file a CTR-C report
3 related to that transaction.

4 i. On or about March 2, 2013, at the TINIAN DYNASTY HOTEL & CASINO,
5 UCA-2 purchased two casino vouchers, each voucher for \$20,000 in U.S. currency, or an
6 aggregate sum of \$40,000 in U.S. currency. GEORGE QUE assisted UCA-2 when UCA-2
7 purchased one of the vouchers. The TINIAN DYNASTY HOTEL & CASINO accepted that
8 cash and did not file a CTR-C report related to that transaction.

9 j. On or about March 2, 2013, at the TINIAN DYNASTY HOTEL & CASINO,
10 GEORGE QUE and TIM BLYTHE informed UCA-1 and UCA-2 that the casino would not issue
11 them a check in exchange for their casino chips and/or vouchers. QUE advised UCA-1 and
12 UCA-2 that they were not yet established customers.

13 k. On or about March 4, 2013, at the TINIAN DYNASTY HOTEL & CASINO,
14 UCA-1 cashed in \$20,000 in U.S. currency at a blackjack table in exchange for casino chips.
15 The TINIAN DYNASTY HOTEL & CASINO accepted that cash and did not file a CTR-C
16 report related to that transaction.

17 l. On or about March 4, 2013, at the TINIAN DYNASTY HOTEL & CASINO,
18 TIM BLYTHE informed UCA-1 and UCA-2 that the casino would not issue them a check in
19 exchange for their casino chips and/or vouchers, and directed they receive their remaining funds
20 entirely in U.S. currency.

21 m. On or about March 4, 2013, UCA-1 and UCA-2 exchanged their casino chips
22 and vouchers, and the TINIAN DYNASTY HOTEL & CASINO provided UCA-1 with \$148,150
23 in U.S. currency and provided UCA-2 with \$80,480 in U.S. currency. The TINIAN DYNASTY
24

1 HOTEL & CASINO conducted such transactions and did not file CTR-C reports related to such
2 cash transactions.

3 All in violation of 18 U.S.C. § 371.

4 (Counts 2 to 10)

5 **CAUSING A FINANCIAL INSTITUTION TO FAIL TO FILE**
6 **A CURRENCY TRANSACTION REPORT**

7 On or about the dates set forth below, in the District of the Northern Mariana Islands, the
8 defendants, HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba
9 TINIAN DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, knowingly and
10 for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a) and the regulations
11 promulgated thereunder, caused and attempted to cause TINIAN DYNASTY HOTEL &
12 CASINO, a domestic financial institution, to fail to file a currency transaction report (“CTR”)
13 required under 31 U.S.C. § 5313(a), specifically, a Currency Transaction Report for Casinos –
14 FinCEN Form 103 or its electronic equivalent, and did so as part of a pattern of illegal activity
15 involving more than \$100,000 in a twelve-month period:

Count	Date	Cash Total	Description of Transaction
17 2	February 28, 2013	\$30,000	UCA-1 purchased voucher in name of UCA-2 for \$30,000 in U.S. currency
18 3	February 28, 2013	\$15,000	UCA-2 purchased voucher for \$15,000 in U.S. currency
19 4	February 28, 2013	\$40,000	UCA-1 purchased voucher in name of UCA-2 for \$40,000 in U.S. currency
20 5	February 28, 2013	\$16,500	UCA-1 and UCA-2 exchanged TDHC casino chips for \$16,500 in U.S. currency

1	6	March 2, 2013	\$60,000	UCA-1 purchased voucher in name of UCA-2 for \$60,000 in U.S. currency
2				
3	7	March 2, 2013	\$40,000	UCA-2 purchased two vouchers, each for \$20,000 in U.S. currency
4	8	March 4, 2013	\$20,000	UCA-1 cashed in \$20,000 in U.S. currency for TDHC casino chips
5				
6	9	March 4, 2013	\$148,150	UCA-1 received \$148,150 in U.S. currency in exchange for a \$46,250 voucher in name of UCA-2, a \$60,000 voucher in name of UCA-1, and TDHC casino chips worth \$41,900
7				
8	10	March 4, 2013	\$80,480	UCA-2 received \$80,480 in U.S. currency in exchange for a \$25,000 voucher in name of UCA-2, and TDHC casino chips worth \$55,480
9				
10				

11 All in violation of 31 U.S.C. §§ 5324(a)(1) and (d)(2), and 18 U.S.C. § 2.

12 **NOTICE OF FORFEITURE**

13 1. All of the allegations contained in this Complaint including Counts One through Ten
14 above are incorporated and realleged as though fully set forth in their entirety herein for the
15 purpose of alleging forfeiture pursuant to 31 U.S.C. § 5317(c).

16 2. Defendants, HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS,
17 LTD. dba as TINIAN DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, if
18 convicted of any of the offenses charged under Counts One through Ten, shall forfeit to the
19 United States the following property:

20 a. All right, title, and interest in any and all property involved in the offense
21 committed in violation of 31 U.S.C. § 5324(a)(1), and the conspiracy to violate 31 U.S.C. §
22 5313(a), for which each defendant is convicted, and all property traceable to such property,
23 including, but not limited to, the following:
24

- 1 (1) all money or other property that was the subject of each transaction conducted
2 in violation of 31 U.S.C. § 5324(a)(1), or involved in a conspiracy to violate
31 U.S.C. § 5313(a);
- 3 (2) all property traceable to money or property described in this
4 paragraph 2.a.(1);
- 5 (3) Bank Account Number 0510-102684 and its contents held at Bank of Saipan,
6 in the name of Hong Kong Entertainment (Overseas) Ltd.;
- 7 (4) Bank Account Number 0510-102692 and its contents held at Bank of Saipan,
8 in the name of Hong Kong Entertainment (Overseas) Ltd.;
- 9 (5) Bank Account Number 103133228 and its contents held at Bank of Guam,
10 in the name of HongKong Entertainment Overseas Inv.;
- 11 (6) Bank Account Number 103108325 and its contents held at Bank of Guam,
12 in the name of HongKong Entertainment Overseas Inv.;
- 13 (7) Tinian Dynasty Hotel & Casino located at One Broadway, Tinian,
14 Commonwealth of the Northern Mariana Islands

15 b. a money judgment equal to the total amount of money involved in the
16 offense committed in violation of 31 U.S.C. § 5324(a)(1), or the conspiracy to violate 31 U.S.C.
17 § 5313(a), for which each defendant is convicted, or for which defendants HONG KONG
18 ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN DYNASTY HOTEL
19 & CASINO, TIM BLYTHE, and GEORGE QUE may be held jointly and severally liable;

20 3. If, as a result of any act or omission by defendants, HONG KONG
21 ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN DYNASTY HOTEL
22 & CASINO, TIM BLYTHE, and GEORGE QUE, any of the foregoing money or property (a)
23 cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or
24 deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has
been substantially diminished in value; or (e) has been commingled with other property that
cannot be subdivided without difficulty, then any other property or interests of defendants,

1 HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENT, LTD. dba TINIAN
2 DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, up to the value of the
3 money and property described in the preceding paragraph of this Complaint, shall be subject to
4 forfeiture to the United States.

5 COMPLAINANT FURTHER STATES:

6 I, TODD M. PETERSON, being first duly sworn on oath, depose and say:


7 See attached Affidavit in Support of Complaint, as Exhibit A.

8 Conclusion

9 As set forth in this affidavit, I submit that there is probable cause to believe that HONG
10 KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. dba TINIAN DYNASTY
11 HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE have committed offenses in violation
12 of 31 U.S.C. §§ 5313(a), 5324(a)(1) and (d)(2), and 18 U.S.C. §§ 371 and 2.

13
14 
15 TODD M. PETERSON
Special Agent, IRS-CI

16
17 SUBSCRIBED AND SWORN to before me on this 19th day of April, 2013.

18
19 
20 RAMONA V. MANGLONA
Chief Judge
21 District Court of the NMI
22
23
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AFFIDAVIT IN SUPPORT OF COMPLAINT

I, TODD PETERSON, being first duly sworn on oath, depose and say:

1. I am a Special Agent with the Internal Revenue Service Criminal Investigation (hereafter referred to as "IRS-CI") and have been so employed since July 2001. My official duties and responsibilities include the investigation of alleged criminal violations of the Internal Revenue laws and related offenses. I have conducted and assisted in the investigation of suspected tax fraud, money laundering, and currency reporting violations. I have also participated in the execution of many search warrants sought by and issued to myself and other special agents of the Internal Revenue Service, Criminal Investigation.

2. I have successfully completed nine weeks of criminal investigative training at the Federal Law Enforcement Training Center in Brunswick, Georgia. My training included courses in law enforcement techniques, Federal criminal statutes, conducting criminal investigations, and the execution of search warrants. I have also successfully completed a nine week Special Agent Basic Training course at the Federal Law Enforcement Training Center, which includes courses in financial investigative techniques, legal principles and statutes representing criminal violations of the United States Code as enumerated in Titles 18, 26 and 31. I have attended Continuing Professional Education seminars and periodic training exercises throughout my career. In addition, I have attended a weeklong advanced training course in International Banking and Money Laundering at the Federal Law Enforcement Training Center. I received a bachelor's degree in accounting and marketing/logistics in 2001.

3. My federal criminal investigative experience has involved the use of consensual monitoring, surveillance, financial records analysis, interviews, and other investigative techniques. Through the course of these investigations, I have also personally interviewed witnesses, informants, and persons arrested for white collar and other crimes. I have spoken with more experienced investigators with whom I work concerning the practices of white collar and other criminals, and the best methods to use in the investigations of such individuals and organizations. Through the course of my investigations and conversations with more experienced investigators, I have become familiar with the various types of evidence found during the searches of residences, businesses, vehicles and storage areas used by white collar and other criminals.

4. I am familiar with the information contained in this affidavit, either through personal knowledge or discussions with other law enforcement officers, government agencies, and Internal Revenue Service employees who have obtained information that they have reported to me, and publicly reported information gathered during the course of this investigation. Since this affidavit is being submitted for the limited purpose of securing arrest warrants for HONG KONG ENTERTAINMENT (OVERSEAS) INVESTMENTS, LTD. ("HKEOIL") dba TINIAN DYNASTY HOTEL & CASINO, TIM BLYTHE, and GEORGE QUE, I have not included every fact known to me concerning this investigation, and have set forth only the facts that I believe are necessary to establish probable cause for this Complaint.

Statutory Authority

5. The Bank Secrecy Act ("BSA"), codified at Title 31, United States Code,

Sections 5313-5326, is a set of laws and regulations enacted by Congress to address an increase in criminal money laundering through financial institutions.

6. Title 31, United States Code, Section 5324(a) provides that: "No person shall, for the purpose of evading the reporting requirements of section 5313(a) or 5325 or any regulation prescribed under any such section, the reporting or recordkeeping requirements imposed by any order issued under section 5326, or the recordkeeping requirements imposed by any regulation prescribed under section 21 of the Federal Deposit Insurance Act or section 123 of Public Law 91-508 -- (1) cause or attempt to cause a domestic financial institution to fail to file a report or to maintain a record required by an order issued under section 5326, or to maintain a record required pursuant to any regulation prescribed under section 21 of the Federal Deposit Insurance Act or section 123 of Public Law 91-508; (2) cause or attempt to cause a domestic financial institution to file a report required under section 5313(a) or 5325 or any regulation prescribed under any such section, to file a report or to maintain a record required pursuant to any regulation prescribed under section 21 of the Federal Deposit Insurance Act or section 123 of Public Law 91-508, that contains a material omission or misstatement of fact".

7. Title 31, United States Code, Section 5313(a) provides that: "When a domestic financial institution is involved in a transaction for the payment, receipt, or transfer of United States coins or currency (or other monetary instruments the Secretary of the Treasury prescribes), in an amount, denomination, or amount and denomination, or under circumstances the Secretary prescribes by regulation, the institution and any other participant in the transaction the Secretary may prescribe shall file a report on the

transaction at the time and in the way the Secretary prescribes. A participant acting for another person shall make the report as the agent or bailee of the person and identify the person for whom the transaction is being made.”

8. The implementing regulations are contained in Title 31, Code of Federal Regulations, Part 103, which are now contained in Chapter X within the same Title effective March 1, 2011.

9. The definition of a financial institution for the purposes of the BSA is defined in Title 31, Code of Federal Regulations, Section 1010.100(t) and includes “A casino or gambling casino that: Is duly licensed or authorized to do business as such in the United States, whether under the laws of a State or of a Territory or Insular Possession of the United States, or under the Indian Gaming Regulatory Act or other Federal, State, or tribal law or arrangement affecting Indian lands (including, without limitation, a casino operating on the assumption or under the view that no such authorization is required for casino operation on Indian lands), and has gross annual gaming revenue in excess of \$1 million. The term includes the principal headquarters and every domestic branch or place of business of the casino. It is important to note that activities related, but separate, to the operation of a casino, such as a hotel or food and beverage services, do not fall under the definition of a “financial institution” for purposes of the Bank Secrecy Act.

10. One of the BSA mechanisms to uncover criminal activity conducted through financial institutions is a requirement that casinos and other financial institutions file a “Currency Transaction Report for Casinos” (hereafter referred to as a “CTR”), FinCEN

Form 103 or its electronic equivalent, with the Department of the Treasury, for any transaction involving more than \$10,000 in U.S. currency.

11. A CTR consists of three parts. Part I requires the financial institution to verify and accurately record the name and address of the individual who conducted a reportable currency transaction, as well as to accurately record the identity, social security number, or taxpayer identification number of any person or entity on whose behalf the currency transaction was conducted. Part II requires the financial institution to record the date, the amount of the transaction, and the form of the transaction. Part III requires the name of the financial institution where the transaction occurred, the person completing the CTR, and the person approving the completion and filing of the CTR. A CTR is required to be filed no later than the 15th calendar day after the day of the transaction.

12. Title 31, United States Code, Section 5313(a) and related regulations, including Title 31, Code of Federal Regulations, Sections 1010.312 and 1021.312, require a financial institution to verify and record the name and address of the individual presenting a transaction, as well as record the identity, account number, and the social security number or taxpayer identification number, if any, of any person or entity on whose behalf such transaction is to be effected. Verification of the identity of an individual who indicates that he or she is an alien or is not a resident of the United States must be made by passport, alien identification card, or other official document evidencing nationality or residence. Verification of identity in any other case shall be made by examination of a document, other than a bank signature card, that is normally acceptable within the banking community as a means of identification for nondepositors.

The specific identifying information used in verifying the identity of the customer shall be recorded on the report, and the mere notation of “known customer” or “bank signature card on file” on the report is prohibited.

13. Title 31, United States Code, Section 5313(a) and related regulations, including Title 31, Code of Federal Regulations, Sections 1010.980 and 1021.313, require that casinos treat multiple currency transactions as a single transaction and file a CTR if the financial institution has knowledge that the multiple transactions were by or on behalf of any person and resulted in either cash in or cash out totaling more than \$10,000 (or an equivalent amount of foreign currency) during any one gaming day.

14. Another BSA mechanism to uncover criminal activity conducted through financial institutions is a requirement that casinos, like other financial institutions, file a “Suspicious Activity Report by Casinos” (hereafter referred to as a “SAR”), or its equivalent, with the Department of Treasury, for any suspicious transaction (as defined in Title 31, Code of Federal Regulations, Section 1021.320) no later than 30 calendar days after the date of the initial detection by the casino of facts that may constitute a basis for filing a SAR.

15. In addition, Title 31, United States Code, Section 5318(h) and related regulations, including Title 31, Code of Federal Regulations, Section 1021.210, requires casinos to develop, implement, and maintain an effective anti-money laundering program reasonably designed to prevent the casino from being used to facilitate money laundering.

Case Background

16a. As part of my duties as a Special Agent, I have been assigned to investigate the activities of TDHC and its agents and employees to determine whether their activities constitute violations of federal laws, specifically Title 31. As set forth in detail below, in this investigation, I have found evidence indicating that employees and agents of TDHC have violated Title 18, United States Code, Section 371, Title 31, United States Code, Sections 5324(a)(1), (a)(2), and/or (d)(2), and Title 31, United States Code, Sections 5318(h), and 5322.

16b. Title 18, United States Code, Section 371 and Title 31, United States Code, Sections 5318(h) and 5322 make it a crime to conspire to fail to maintain an effective anti-money laundering program. The elements of this offense are:

- a. There was an agreement between two or more persons to fail to maintain an effective anti-money laundering program;
- b. A defendant became a member of the conspiracy knowing of at least one of its objects and intending to help accomplish it; and
- c. One of the members of the conspiracy performed at least one overt act for the purpose of carrying out the conspiracy.

16c. Title 31, United States Code, Sections 5318(h) and 5322 make it a crime to fail to maintain an effective anti-money laundering program. The elements of this offense are:

- a. TDHC operated as a casino or gambling casino and was a financial institution located in the CNMI, an insular possession of the United States;
- b. A defendant caused TDHC to fail to implement one or more of the following minimal requirements set forth by regulation by the Secretary of the Treasury:
 1. Have effective written policies, procedures and controls for one or more the following: (i) verifying customer identification; or (ii) filing

- reports, such as currency transaction reports; or (iii) creating and retaining records; or (iv) responding to law enforcement requests;
- 2. Designate a person to assure day to day compliance with the anti-money laundering program, including assuring that: (i) the check cashier properly files reports, creates and retains records, in accordance with applicable requirements, such as filing currency transaction reports; and (ii) the program is updated as necessary to reflect new requirements; or
- 3. Provide education and/or training of appropriate personnel concerning their responsibilities under the program; and

c. A defendant acted willfully in failing to develop, implement, and maintain an effective anti-money laundering program.

16d. Title 18, United States Code, Section 371 and Title 31, United States Code, Sections 5313, 5324(a)(1), and 5324(d)(2) make it a crime to conspire to cause or attempt to cause a domestic financial institution to fail to file a report under Section 5313(a) of Title 31 of the United States Code. The elements of this offense are:

- a. There was an agreement between two or more persons to cause or attempt to cause a domestic financial institution to fail to file a currency transaction report, as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period;
- b. Defendant became a member of the conspiracy knowing of at least one of its objects and intending to help accomplish it; and
- c. One of the members of the conspiracy performed at least one overt act for the purpose of carrying out the conspiracy.

16e. Title 31, United States Code, Sections 5313, 5324(a)(1), and 5324(d)(2) make it a crime to cause or attempt to cause a domestic financial institution to fail to file a report - - i.e., a currency transaction report - - under Section 5313(a) of Title 31 of the United States Code. The elements of this offense are:

- a. The defendant knew of the currency transaction reporting requirement;
- b. The defendant knowingly caused or attempted to cause a domestic financial institution to fail to file a currency transaction report, as part of a

pattern of illegal activity involving more than \$100,000 in a 12-month period; and

c. The defendant acted with the purpose to evade a transaction reporting requirement.

Information Obtained from FinCEN Data and Bank Records

17. FinCEN is a bureau of the US Department of the Treasury and is responsible for the central collection, analysis, and dissemination of data reported under FinCEN's regulations and other related data in support of government and financial industry partners at the Federal, State, local, and international levels.

18. According to FinCEN records, from 1998 until September 2009, TDHC routinely filed CTRs for reportable cash transactions it conducted with casino customers. Since 1998, TDHC had filed approximately 6,789 CTRs. On September 12, 2009, however, TDHC abruptly stopped filing CTRs with FinCEN. According to FinCEN records, TDHC has never filed a SAR with FinCEN.

19. FinCEN records show that TDHC uses two financial institutions to conduct its banking activities, the Bank of Saipan and the Bank of Guam. CTRs are frequently filed by the Bank of Guam (Account No. 103133228 and Account No. 103108325) and the Bank of Saipan (Account No. 0510-102684 and Account No. 0510-102692) relating to transactions conducted by, or on behalf of, TDHC. The bank accounts are held in the name of Hong Kong Entertainment (Overseas) Ltd. (Bank of Saipan) and Hongkong Entertainment Overseas Inv. (Bank of Guam). The current bank account balances are unknown. To protect the integrity of this investigation, the government will serve grand jury subpoenas to the banks requesting their account records upon execution of a search warrant.

20. FinCEN Reports of International Transportation of Currency or Monetary Instruments (hereafter referred to as "CMIR") filed by (or on behalf of) TDHC show that the TDHC imported \$7.9 million in US currency from China and Hong Kong in 2010 and 2011 and exported approximately \$3.5 million in a mix of US currency, Japanese Yen, and South Korean Won during the same time period. A CMIR is filed by an individual or business that transports, or causes the transportation of \$10,000 or more in currency or other negotiable instruments into or out of the United States.

21. TDHC registered with FinCEN on or about October 14, 2011 as a Money Service Business for "Currency Dealer or Exchanger" activities, which further demonstrates TDHC's familiarity with FinCEN regulatory requirements.

22. During the investigation, agents obtained bank records relating to the financial activities of an individual with the initials "WX". According to the bank records, WX is the owner of two companies, one in Saipan and one in Pohnpei, Federated States of Micronesia. The bank inquired with WX to determine the purpose of many of his cash transactions. As noted below, WX reported that he was conducting transactions at the TDHC casino. The Bank of Guam filed CTRs for the cash transactions, but TDHC did not file any CTRs for the transactions identified by WX as having been conducted at the TDHC casino. WX engaged in the following transactions:

<u>Date</u>	<u>Description of Transactions</u>
9/21/2009	Deposit of \$86,000 cash with notation "Won in a Black Jack Game at Tinian Dynasty"
9/22/2009	Deposit of \$15,700 cash with notation "Winnings from Tinian Dynasty"
9/24/2009	Deposit of \$58,000 cash with notation "Won at Tinian Dynasty"
9/26/2009	Withdrawal of \$20,000 cash with notation "Casino purposes"
11/5/2009	Withdrawal of \$25,000 cash with notation "Going to Tinian Dynasty to Play Black Jack"

4/28/2010 Cash Deposit of \$50,000 for unknown purpose
5/20/2010 Cash Withdrawal of \$30,000 for unknown purpose
5/24/2010 Deposit of \$80,000 Bank of Saipan Cashier's Check, which is the bank used by TDHC. The remitter is listed as WX, but WX may have purchased the cashier's check from TDHC funds. On the same date, three (3) Checks were negotiated from WX's account totaling \$100,000 and payable to Hong Kong Entertainment (Overseas) Investment Ltd.

23. Thomas Liu, the General Manager of the TDHC, and/or an individual believed to be Liu's wife (hereinafter referred to as "Liu's wife") have made frequent cash deposits into their joint personal bank account at First Hawaiian Bank totaling \$111,500 since December 29, 2010. Two of the deposits were made by Liu's wife on December 29, 2010, and January 6, 2011, each in the amount of \$9,500. One of the two deposits consisted solely of \$100 bills. The teller asked Liu's wife for identification, but she told the teller that identification was not required to make a deposit and would not elaborate on the source of funds. These funds were subsequently transferred by check to an account at another bank controlled by Dianne Liu (unknown relation). Dianne Liu later transferred a majority of these funds to yet another bank account, ownership unknown. On January 12, 2012, another deposit of \$22,000 was made by Liu's wife, all in \$100 bills. These funds appear to have been used to pay off a \$21,820.99 joint credit card balance, which consisted almost exclusively of purchases from the DFS Galleria (a duty free luxury goods retailer in Saipan).

24. A company named "Tinian Dynasty Travel Co. Ltd." conducted several large cash transactions in conjunction with, or on behalf of, HKEOI. Tinian Dynasty Travel Co. Ltd. lists only a Hong Kong Address without a US Employer ID Number. A vast majority of these transactions are also conducted in conjunction with Star Marianas Air, Inc., the charter airline flying between Saipan and Tinian. The CTRs involving

Tinian Dynasty Travel Company total \$7,406,751 in “cash-in” transactions between May 20, 2011 and March 1, 2013. It is unusual for companies to make large cash transactions of this nature into accounts belonging to other corporations. The relationship between TDHC, Tinian Dynasty Travel Co. Ltd., and Star Marianas Air, Inc. is unknown.

Information Obtained from Telephonic Undercover Operations

25. An IRS-CI undercover agent placed a consensually monitored telephone call on May 3, 2012. The undercover agent initially contacted Saipan Travel. Saipan Travel referred the undercover agent to the TDHC where the undercover agent eventually made contact with George Que (hereafter referred to as “Que”), who referred to himself as the “VIP Services Manager” at the TDHC. The undercover agent advised Que that the Russian businessman he was representing wanted to bring large amounts of currency to the TDHC, but he did not want any paperwork filed as a result of using this currency to gamble. Que assured the undercover agent that paperwork relating to the use of large amounts of currency would not be filed by the TDHC. The undercover agent asked Que if he understood the type of paperwork that he was referring, to which Que stated that he did. Que did advise the undercover agent that the currency should be reported to CNMI Customs at the Saipan airport, but that was the only form that would need to be filed.

26. A second consensually monitored telephone call was placed by the undercover agent on September 11, 2012. The undercover agent again contacted George Que and inquired about the pending change in TDHC’s ownership. Que responded that TDHC’s previous policies would remain largely unchanged and that the

staff and upper management would remain at the TDHC, despite the change in ownership. Que assured the undercover agent that there was nothing to worry about relating to the undercover agent's desire to conduct large cash transactions without any paperwork being created. Que confirmed that he recalled the previous conversation with the undercover agent.

Information Obtained from In-Person Undercover Operations

27. Two IRS-CI undercover agents made three in-person visits to the TDHC on February 28, 2013, March 2, 2013, and March 4, 2013.

28. On February 28, 2013, the two undercover agents traveled to the TDHC and met with George Que, who identified himself as the "VIP Services Manager". Before conducting any transactions, Que told the undercover agents that they could cash in their casino chips and receive a casino check or wire transfer at the conclusion of their gambling activities. Que assisted the undercover agents in purchasing two TDHC "vouchers" at the casino cashier cage. One undercover agent (hereafter "UCA-1") purchased a voucher with \$30,000 in US currency, while the second undercover agent (hereafter "UCA-2") purchased a voucher with \$15,000 in US currency. However, at the request of the undercover agents, both vouchers were made in the name of UCA-2, even though it was made apparent that the funds were from two separate individuals. Two CTRs were required by law to be filed by TDHC for the \$30,000 and \$15,000 cash transactions, including the name of the person actually conducting the transaction and the person on whose behalf the transaction was conducted (if different from the transactor). Both vouchers were later used by the undercover agents to receive an equivalent value of casino chips from Que at a blackjack table within the casino. After

playing blackjack, the undercover agents exchanged their remaining chips with Que for two vouchers, in the amount of \$30,000 and \$11,500 for UCA-1 and UCA-2, respectively. Both vouchers were again made in the name of UCA-2.

29. Following lunch, UCA-1 independently purchased an additional voucher in the name of UCA-2 with \$40,000 in US currency. George Que later brought an equivalent amount of TDHC casino chips to the blackjack table. One CTR was required by law to be filed by TDHC for the \$40,000 cash transaction, including the identities of both UCA-1 and UCA-2. At the end of this session of blackjack, Que informed the undercover agents that the casino would be unable to redeem the vouchers and/or casino chips for a casino check due to the unavailability of one of the two signers needed to sign a TDHC check. Que suggested that the undercover agents instead exchange their casino chips for a voucher, which could then be exchanged for a casino check on their next visit. Que then exchanged their two vouchers (for \$30,000 and \$11,500) and \$35,000 in TDHC casino chips for a \$60,000 voucher in UCA-1's name and \$16,500 in US currency. One CTR was required by law to be filed by TDHC for the \$16,500 cash transaction, including the identities of UCA-1 and UCA-2.

30. During the visit on February 28, 2013, George Que discussed a pending sale of the casino to Howarm (referring to a possible, but apparently not imminent, sale of the TDHC to Howarm Construction of Taiwan) and confirmed that the sale had not been completed. Que stated that the new owner was not taking 100% interest in the TDHC, but that the new owner would be a majority owner. Que identified Mr. Kwan as the "Chairman" of the TDHC, Tom Liu as the General Manager of the TDHC, and Tim Blythe as the Casino Manager of the TDHC. Que told the undercover agents that the

casino is the main source of TDHC's revenue and that the gaming revenue pays the bills. Que stated that he saw a TDHC customer lose \$2 million from a TDHC credit line over the span of a few days. UCA-2 asked Que, "I'm sure you see that sometimes, too, just coming in with a big briefcase full of cash", to which Que responded "Yeah, a few hundred thousand sometimes. The Japanese." Que also confirmed to the undercover agents that the CNMI is subject to federal law and that federal law supersedes local law. Que also referenced the reporting requirements for individuals departing the CNMI with over \$10,000 in US currency, and mentioned that TDHC has assisted its customers "hundreds of times" with filling out the customs form. The fact that the TDHC is aware that those customers are often carrying in excess of \$10,000 of US currency (or its foreign equivalent) strongly suggests that the customer received in excess of \$10,000 in US currency (or its foreign equivalent) directly from TDHC.

31. On March 2, 2013, the two undercover agents again traveled to the TDHC and met with George Que. UCA-1 purchased a voucher for \$60,000 in US currency under UCA-2's name at the cashier cage, even though it was made clear that the funds came from UCA-1. In separate transactions, UCA-2 purchased two additional vouchers for \$20,000 each in US currency under his own name at the cashier cage. Que assisted UCA-2 with one of the \$20,000 cash transactions. One CTR was required by law to be filed by TDHC for the \$60,000 transaction (identifying both UCA-1 and UCA-2) and another CTR for the \$40,000 transaction for UCA-2 (the aggregate of the two \$20,000 cash transactions).

32. During the visit on March 2, 2013, George Que advised the undercover

agents that the undercover agents would not be able to receive a TDHC casino check, but that it is something they might be able to do once a relationship was established. Tim Blythe (hereinafter referred as to "Blythe"), who represented himself as the Casino Manager, confirmed that the TDHC would not issue a check in exchange for the casino chips and/or vouchers, but agreed that the undercover agents can receive the funds via wire transfer. Blythe discussed the currency reporting requirements that apply to financial institutions if the undercover agents deposited their cash at the Bank of Guam. Blythe also commented that structuring transactions into \$9,900 transactions is also illegal. Blythe confirmed that the currency reporting requirements apply to the TDHC and that a report might have already been filed for the \$16,500 cash the undercover agents received on February 28, 2013. Blythe stated that TDHC files several reports each day with the "local finance office" but was unsure exactly where the reports were actually filed or what happens to them after they are filed. (According to BSA regulations, casinos are required to file the reports directly with FinCEN, and therefore filing these reports with any local office does not comply with BSA regulations absent specific authorization from FinCEN.) Blythe and Que both commented that TDHC could not force a customer to provide their name and would therefore file reports based solely on a general description of the person. Blythe also stated that the Tinian Gambling Commission has about 20 employees, with at least two Commission employees at the casino at all times. The Tinian Gambling Commission, among other duties, reviews TDHC's financial records.

33. Tim Blythe stated that it is not unusual for customers to bring with them

\$100,000 or more in cash to the TDHC. George Que and Blythe also discussed the minimum buy-in and maximum bet limits for the VIP rooms at the back of the casino. They explained that the minimum buy-in is \$1 million and the maximum bet is \$80,000.

34. At the end of the undercover agents' visit on March 2, 2013, the undercover agents exchanged their TDHC casino chips for vouchers. UCA-1 received a \$46,250 voucher in UCA-2's name and kept \$20,000 in TDHC casino chips. UCA-2 received a \$25,000 voucher and kept \$20,200 in TDHC casino chips.

35. On March 4, 2013, the undercover agents traveled a third time to the TDHC. UCA-2 began playing baccarat with the \$20,200 in TDHC casino chips from the previous visit. UCA-1 later joined UCA-2 at a blackjack table. UCA-1 cashed in \$20,000 in US currency and had \$12,000 in TDHC casino chips from the previous visit. One CTR was required by law to be filed by TDHC for the \$20,000 cash transaction conducted by UCA-1.

36. On March 4, 2013, George Que suggested to the undercover agents that asking the questions about the currency transaction reports made Blythe uncomfortable, but assured them that the only report that might be filed by the back office would be relating to their \$16,500 cash out transaction on February 28, 2013. Que again mentioned that they file reports on cash out transactions over \$10,000 every day for anybody. Que also volunteered that UCA-1 is clean except for the \$16,500 transaction and that the copy of his driver's license had been "disposed of," so that TDHC does not have the information necessary to file reports relating to his transactions. Que and the undercover agents discussed a Chinese gentleman that UCA-2 saw carrying an estimated 12-inch stack of currency near the casino cashier. UCA-2 asked Que if this

much currency caused any problems or issues, to which Que responded that it does not cause any problems. Que stated that the chairman of HKEOIL, Mr. Kwan, will remain a partial owner of TDHC even after the sale to Howarm is completed.

37. Later on March 4, 2013, Tim Blythe again met with the undercover agents and notified them that they will not issue a casino check and that the chairman of the TDHC would not sign off on a wire transfer to the undercover agents for anything other than their winnings. If the undercover agents had initially wired their funds to the casino, the casino would wire back all of the funds to them after their play. Blythe reiterated that they are highly regulated by the Tinian Gambling Commission and the Federal Government, and that any cash transaction over \$10,000 would cause a currency transaction report to be filed. Blythe added that the procedures are there for a reason and that he "can't ask his employees to do anything illegal". The undercover agents stated on multiple occasions that they were not asking TDHC to do anything illegal and wanted TDHC to follow their normal procedure to avoid raising any red flags. At Blythe's direction, the undercover agents had to receive their remaining funds entirely in US currency, which would necessarily require the filing of a CTR.

38. At the end of the undercover agents' visit on March 4, 2013, the undercover agents exchanged their TDHC casino chips and vouchers for a total of \$228,630 in US currency. UCA-1 received \$148,150 in US currency in exchange for a \$46,250 voucher in UCA-2's name, a \$60,000 voucher in UCA-1's name, and the remainder in TDHC casino chips. UCA-2 received \$55,480 in US currency for his TDHC casino chips and in a separate transaction, received \$25,000 in US currency for a TDHC voucher. One CTR was required by law to be filed by TDHC for the \$148,150 cash transaction and

another CTR for \$80,480 transaction for UCA-2 (the aggregate of the \$55,480 and \$25,000 cash transactions).

39. The cash-out process on March 4, 2013, took about 45 minutes as the casino cashiers had to receive approvals by telephone before cashing the vouchers. This process alerted additional casino staff to the large cash transactions and provided ample time for TDHC staff to request identifying information and/or prepare CTRs relating to these transactions. In addition, the casino provided a shopping bag for the undercover agents to carry their cash, further demonstrating their direct knowledge of the amount of cash they were receiving.

40. A small sign is displayed at the TDHC cashier cage window detailing the CMIR filing requirements. This further demonstrates TDHC's knowledge of the BSA filing requirements.

41. Based on the conversations and representations made by the undercover agents to TDHC employees and management in conjunction with their cash transactions, TDHC was required by law to file at least one Suspicious Activity Report.

42. To date, TDHC has failed to file with FinCEN any CTR(s) or SAR(s) relating to any of the cash transactions conducted by the undercover agents on February 28, 2013, March 2, 2013, or March 4, 2013.

Estimated Unreported TDHC Currency Transaction Reports

43. TDHC filed frequent CTRs through August, 2009 (and two reports in September, 2009). For the period from January, 2007 through September, 2009, TDHC filed a total of 1,916 CTRs, or an average of 58 reports per month. The total amount of reportable cash-in transactions during this period was \$25,114,002 and reportable cash

out transactions during this period was \$43,690,410. The reports were filed in the following amounts:

<u>Year</u>	<u>Reports</u>	<u>Cash In</u>	<u>Cash Out</u>
2007	852	\$9,875,081.00	\$21,083,470.00
2008	656	\$9,721,757.00	\$14,490,600.00
2009	408	\$5,517,164.00	\$8,099,740.00

44. It is difficult, if not impossible, to accurately calculate the exact number or dollar amounts of CTRs that TDHC failed to file for cash transactions conducted for the period from October, 2009 through March, 2013 without obtaining TDHC's own business records. However, an analysis of the previous CTR filings made by TDHC provides a reasonable basis to estimate the number of forms TDHC failed to file and the total amount of cash transactions it failed to report.

45. Based on an analysis of TDHC's CTR filing history, it appears that the period from February, 2009 to September, 2009 would provide the most relevant "baseline" from which to extrapolate TDHC's potential non-filed CTRs. In addition, using this most recent data provides a more conservative estimate, since the average CTR filings in 2009 are less than 2007 or 2008 on an absolute or average basis. January, 2009 was excluded from the calculations, as TDHC failed to file any CTRs in that month. This "baseline" indicates that TDHC filed an average 51 reports per month, with an average reportable cash in of \$689,645.50 per month and an average reportable cash out of \$1,014,542.50 per month.

46. Using the CTR data for reports filed by TDHC for the period from February 1,

2009 through September 30, 2009 as a baseline, TDHC would be expected to file 2,142 CTRs for the period from October, 2009 through March, 2013, reporting cash-in of \$28,965,111.00 and cash-out of \$42,610,785.

47. This extrapolation is supported by an analysis of the CTR filings made by the Bank of Guam and Bank of Saipan for reportable cash transactions conducted by TDHC relative to Bank of Guam accounts 103108325 and 103133228 and Bank of Saipan accounts 210102692 and 510102684, as well as others. These CTRs do not show TDHC's source of funds. However, there is probable cause to believe that funds in the accounts are from the operation of the casino. All four of these accounts involve large cash transactions. Also, during the undercover operation, George Que told undercover agents that the casino is TDHC's main source of revenue and that the gaming revenue pays the bills.

48. The analysis of the CTR filings by the Bank of Guam and Bank of Saipan further shows that TDHC's own large cash transaction activity remained relatively consistent after September 2009 (when TDHC ceased filing CTRs for cash transactions with TDHC customers). In fact, 2012 saw increased reportable cash deposits by TDHC over the years 2007-2011. The reportable cash-in amounts by year are as follows:

2007	\$4,910,639.00
2008	\$6,608,579.00
2009	\$6,344,234.00
2010	\$6,800,679.00
2011	\$5,971,825.00
2012	\$11,628,334.00

TDHC's higher reportable cash deposits in 2012 provide a reasonable indication that casino revenue did not decline after September, 2009 and that the form of customer transactions has not changed significantly from cash to other forms of payment that might explain the sudden cessation of CTR filings by TDHC.

Additional Financial Analysis

49. Based upon my training and experience, businesses typically deposit at least a portion of their daily receipts into their business bank accounts on a regular basis. As such, it is likely that at least a portion of the cash received from cash transactions in which a CTR was required to be filed would be deposited into TDHC's business bank accounts.

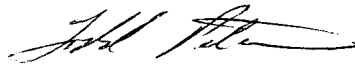
50. The CTR filings by TDHC, Bank of Guam, and Bank of Saipan seem to indicate that TDHC was extremely cash negative. For instance, between January, 2007 and September, 2009, TDHC filed cash-out CTR's of \$43,690,410 and cash-in CTRs of \$25,114,002.00, resulting in net cash-out of \$18,576,408.00 from reportable cash transactions. During the same period, TDHC deposited into its own bank accounts \$16,038,931.00 in reportable cash transactions and withdrew only \$2,779,610.00 in reportable cash transactions, resulting in a net cash "outflow" of \$13,259,371.00. Taken together, TDHC disbursed in currency \$31,831,179.00 more than it received in reportable transactions. This massive amount of outgoing cash, without an apparent corresponding legitimate source, seems to indicate that TDHC was either under-reporting its reportable cash receipts (when it was still filing CTRs), or is receiving large amounts of cash through other means that have not been identified.

51. Newspaper articles report that TDHC has been struggling financially. On

April 3, 2013, the Marianas Variety newspaper reported that TDHC has failed to pay employee wages for the six pay periods since January 2013. A Saipan Tribune July 5, 2012 article reported that HKEOIL settled a \$30 million tax bill owed to the CNMI government for \$6.1 million, as part of the negotiation to sell the TDHC to Howarm.

Request for Sealing

52. I respectfully request that this affidavit, and other associated court records be sealed until further order of the Court.

 4/19/2013
TODD PETERSON