

**DSTATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF BUSINESS REGULATION  
JOHN O. PASTORE CENTER, BLDG. 68-1  
1511 PONTIAC AVENUE  
CRANSTON, RHODE ISLAND 02920**

IN THE MATTER OF	:	
	:	
KATHLEEN BONER,	:	DBR No. 14RA017
	:	
RESPONDENT.	:	
	:	

**CONSENT AGREEMENT**

The Division of Racing and Athletics (“Division”) of the Rhode Island Department of Business Regulation (“Department”) enters into this Consent Agreement (“Agreement”) with Respondent Kathleen Boner (“Respondent”) to resolve the above-captioned matter pursuant to its authority under R.I. Gen. Laws § 42-35-9(d).

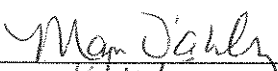
It is hereby agreed by and between the Division and the Respondent that:

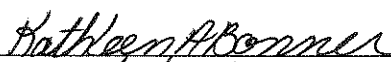
1. On June 6, 2013, the Department issued an Operation Employee License (“License”) to the Respondent.
2. Pursuant to R.I. Gen. Laws § 41-4-9.1(c), the Department “may suspend or revoke for good cause any license issued by it after a hearing held in accordance with chapter 35 of title 42.”
3. Violation of federal and state law is “good cause” within the meaning of R.I. Gen. Laws § 41-4-9.1(c).
4. 31 C.F.R. § 1010.314 prohibits “structuring” which is defined as making a series of transactions in order to avoid the requirement that transaction over \$10,000 be reported to the Department of Treasury.

5. R.I. Gen. Laws § 11-9.1-15(a)(4)(ii) prohibits conducting a financial transaction knowing that the transaction is designed to avoid a transaction reporting requirement under the laws of this state or of the United States.
6. The Department alleges that on October 5, 2014, the Respondent exchanged table game chips for cash in a series of smaller transactions in violation of 31 C.F.R. § 1010.314 and R.I. Gen. Laws § 11-9.1-15(a)(4)(ii).
7. In order to resolve this matter without a hearing, but without admitting or denying the allegations, the Respondent voluntarily surrenders the License.
8. The Respondent shall not be eligible to apply for any gaming license under the Department's jurisdiction in the future.
9. By signing this Agreement, Respondent acknowledges and understands that, with respect to the voluntary surrender of the License, she voluntarily waives any right to an administrative hearing or appeal to Superior Court under the Rhode Island Administrative Procedures Act, R.I. Gen. Laws § 42-35-1 *et seq.*

For the Division:

For the Respondent:

  
\_\_\_\_\_  
Date: 7/16/15  
Maria D'Alessandro  
Deputy Director of Racing and  
Athletics

  
\_\_\_\_\_  
Date: 7/16/15  
Kathleen Boner  
Respondent