

## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** November-01-18 4:13 PM  
**To:** Lara Gerrits; Jim D. Lightbody  
**Subject:** RE: IN - Tentative Agreement BCGEU Gateway Casinos

Thanks Lara – excellent news.

Sam

---

**From:** Lara Gerrits  
**Sent:** Thursday, November 1, 2018 3:13 PM  
**To:** Jim D. Lightbody ; MacLeod, Sam GPEB:EX  
**Subject:** FW: IN - Tentative Agreement BCGEU Gateway Casinos

Hi Jim and Sam,

You were missed on this distribution from a moment ago – please see attached Information Note regarding a tentative deal between BCGEU and Gateway Casinos.

Thanks,

Lara

Lara Gerrits  
Manager, Media & Issues Management  
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6  
T 604 228 3066 C s 17(1)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

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**From:** Evan Kelly  
**Sent:** November-01-18 3:10 PM  
**To:** 'Cadence.Mandybura@gov.bc.ca' <[Cadence.Mandybura@gov.bc.ca](mailto:Cadence.Mandybura@gov.bc.ca)>; 'nicole.fellinger@gov.bc.ca' <[nicole.fellinger@gov.bc.ca](mailto:nicole.fellinger@gov.bc.ca)>; 'Robert.Duffus@gov.bc.ca' <[Robert.Duffus@gov.bc.ca](mailto:Robert.Duffus@gov.bc.ca)>  
**Cc:** 'Aimee.Harper@gov.bc.ca' <[Aimee.Harper@gov.bc.ca](mailto:Aimee.Harper@gov.bc.ca)>; 'jeff.henderson@gov.bc.ca' <[jeff.henderson@gov.bc.ca](mailto:jeff.henderson@gov.bc.ca)>; 'Michele.JaggiSmith@gov.bc.ca' <[Michele.JaggiSmith@gov.bc.ca](mailto:Michele.JaggiSmith@gov.bc.ca)>; Laura Piva-Babcock <[L.Piva-Babcock@bclc.com](mailto:L.Piva-Babcock@bclc.com)>; 'Rachel.DeMott@gov.bc.ca' <[Rachel.DeMott@gov.bc.ca](mailto:Rachel.DeMott@gov.bc.ca)>; Sarah Morris <[SMorris@BCLC.com](mailto:SMorris@BCLC.com)>; Susan Dolinski <[SDolinski@BCLC.com](mailto:SDolinski@BCLC.com)>; Lara Gerrits <[LGerrits@bclc.com](mailto:LGerrits@bclc.com)>  
**Subject:** IN - Tentative Agreement BCGEU Gateway Casinos

Hi Cadence et al,

Please see the attached information note regarding today's report of a tentative deal between the BCGEU and Gateway Casinos.

Regards,

Evan

Evan Kelly

Communications Officer, Media & Issues

BCLC, 2940 Virtual Way, Vancouver B.C. V5M 0A6

T 604 225 6372 C s 17(1)

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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** November-08-18 3:14 PM  
**To:** Jim D. Lightbody  
**Subject:** BCLC and GameSense - Vancouver UX Awards

Jim

I understand that BCLC's GameSense.com redesign is up for an award at the Vancouver UX Awards.  
<https://www.linkedin.com/feed/update/urn:li:activity:6466383847834550272>

Congratulations and good luck to your team.

Sam

## Kevin Simcoe

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** November-09-18 7:16 AM  
**To:** Jim D. Lightbody  
**Subject:** AML Report

Jim

The House Finance Committee report on AML is out this morning at:

<http://www.ourcommons.ca/DocumentViewer/en/42-1/FINA/report-24>

Some very interesting recommendations

Sam



## Kevin Simcoe

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** November-15-18 3:42 PM  
**To:** Jim D. Lightbody; Scott, Douglas S AG:EX  
**Subject:** RE: FinTRAC Audit Letter

Thanks Jim – I will get a copy from Anna to review.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Thursday, November 15, 2018 3:34 PM  
**To:** Scott, Douglas S AG:EX ; MacLeod, Sam GPEB:EX  
**Subject:** FinTRAC Audit Letter

Doug and Sam;

We've just received the letter from FinTRAC regarding the audit they completed on BCLC's AML program for the period March 1/17 – Feb 28/18. We are currently reviewing it and developing our response as per the requirement. Once we've digested it, we'd be happy to take you through it in a week or so.

Anna Fitzgerald was cc'd on the letter if you want to see a copy.

Cheers,  
Jim

Jim Lightbody  
President & CEO

BCLC Head Office  
74 West Seymour Street, Kamloops BC V2C 1E2  
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BCLC Marketing & Sales Office  
2940 Virtual Way, Vancouver BC V5M 0A6  
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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-05-18 3:32 PM  
**To:** Jim D. Lightbody; Dave Boychuk  
**Cc:** Vear, Maureen GPEB:EX; Suzanne Rowley  
**Subject:** RE: BCLC - Draft Service Plan for review

Thanks Jim – we will have the feedback to you by the 11<sup>th</sup>.

Sam

### Sam MacLeod

Assistant Deputy Minister and  
General Manager  
Gaming Policy and Enforcement Branch

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**From:** Suzanne Rowley On Behalf Of Jim D. Lightbody  
**Sent:** Wednesday, December 5, 2018 2:53 PM  
**To:** MacLeod, Sam GPEB:EX ; Boychuk, Dave GPEB:EX  
**Cc:** Vear, Maureen GPEB:EX ; Suzanne Rowley ; Jim D. Lightbody  
**Subject:** BCLC - Draft Service Plan for review

Hi Sam,

As requested, attached is a DRAFT watermarked copy of BCLC's Service Plan for your review. Please have any feedback returned to us by **December 11 at 9 AM** to ensure we can adequately review and verbally talk our Board through any significant comments/changes during our December 12 Board meeting.

Following the Board meeting we will roll up all of the Board and Ministry's feedback into an updated draft for the Ministry's second review. This will be sent to the Ministry by noon on December 14<sup>th</sup> and the second round of feedback will be returned to BCLC by Dec. 18<sup>th</sup> and we'll clean it up and send an updated draft to CARO by the 19<sup>th</sup>.

Dec. 5	Send to Ministry for first review
<b>Dec. 11 – 9 AM</b>	<b>Ministry to send back first round of comments</b>
Dec. 12	Board meeting (any significant changes/comments from Ministry to be verbally shared with Board)
Dec. 14 – noon	Send SP to Ministry for second review (includes feedback from first Ministry review and Board)
<b>Dec. 18</b>	<b>Ministry to send back second round of comments</b>
Dec. 19	BCLC incorporates feedback from Ministry & Exec review
<b>Dec. 19</b>	<b>BCLC sends SP for CABRO review</b>

Thank you,

Jim Lightbody

President & CEO

BCLC Head Office

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-06-18 10:56 AM  
**To:** Jim D. Lightbody; Scott, Douglas S AG:EX  
**Subject:** RE: s 15(1)

Jim

I recommended they be advised.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Thursday, December 6, 2018 10:28 AM  
**To:** MacLeod, Sam GPEB:EX ; Scott, Douglas S AG:EX  
**Subject:** RE: s 15(1)

Sam,  
Just to confirm, are you saying DMC needs to be advised or approved?

Doug,  
I don't have the DMC terms of reference in front of me, but we should look at that and that might inform us whether the DMC approves each improvement or operational policy change that BCLC or GPEB makes or is just made aware of. Frankly, I'm fine either way, we just need clarity for our teams.  
It should also be said that ANY AML changes BCLC makes are and will always be collaborative with GPEB.

Thanks,  
Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Date:** December 6, 2018 at 9:48:44 AM PST  
**To:** Scott, Douglas S AG:EX <[Douglas.S.Scott@gov.bc.ca](mailto:Douglas.S.Scott@gov.bc.ca)>, Jim D. Lightbody <[JDLightbody@bclc.com](mailto:JDLightbody@bclc.com)>  
**Subject:** RE: s 15(1)

Doug

I do recommend DMC being advised prior to implementation.

Sam

---

**From:** Scott, Douglas S AG:EX  
**Sent:** Thursday, December 6, 2018 9:14 AM  
**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>; 'Jim D. Lightbody' <[JDLightbody@bclc.com](mailto:JDLightbody@bclc.com)>  
**Subject:** s 15(1)

Hi Sam, Jim,

See this item in briefing prep. I am thinking this is an item that would be approved by AML ADMC – let me know your thoughts.

Thanks,

**Doug**

Douglas S. Scott  
Associate Deputy Minister  
Ministry of Attorney General  
Government of British Columbia

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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-11-18 12:04 PM  
**To:** Jim D. Lightbody  
**Subject:** RE: Service Plan feedback

Jim

I will send you what we sent forward so you can consider it.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Tuesday, December 11, 2018 11:51 AM  
**To:** MacLeod, Sam GPEB:EX  
**Subject:** RE: Service Plan feedback

I'll send him a text, thanks

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Date:** December 11, 2018 at 11:46:10 AM PST  
**To:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Subject:** RE: Service Plan feedback

Jim

I shot it over to Doug as he wanted to include his comments as well. Do you want to reach out to him or do you want me to?

Sam

---

**From:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Sent:** Tuesday, December 11, 2018 11:31 AM  
**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** Service Plan feedback

Sam,  
Wondering if you have any feedback from our draft service plan? We need to prepare for our Board meeting tomorrow.  
Thanks  
Jim

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## Kevin Simcoe

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-11-18 12:04 PM  
**To:** Jim D. Lightbody  
**Cc:** MacLeod, Sam GPEB:EX  
**Subject:** FW: For your review - BCLC Service Plan  
**Attachments:** DRAFT 2019 Service Plan - Watermarked GPEB Updates.docx

Jim

These were our comments for consideration/information. For the most part minor points but the question from Jillian on the revenue (seems to be a conflict on whether it is increasing/decreasing) is worth considering.

Sam



## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-18-18 11:31 AM  
**To:** Jim D. Lightbody  
**Cc:** Jennifer Gallaway; Rob Kroeker; Hazel, Jillian GPEB:EX  
**Subject:** RE: City of Victoria

Jim

Jillian will be the point of contact and will assign as required.

Thanks  
Sam

---

**From:** Jim D. Lightbody  
**Sent:** Tuesday, December 18, 2018 11:01 AM  
**To:** MacLeod, Sam GPEB:EX  
**Cc:** Jennifer Gallaway ; Rob Kroeker  
**Subject:** RE: City of Victoria

Thanks, Sam, that's great. We'll be putting together the presentation deck this week. Who in your shop should we work with to include your portion?

Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Sent:** Tuesday, December 18, 2018 10:49 AM  
**To:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Subject:** RE: City of Victoria

Jim

I would be happy to participate or, if more appropriate, one of my staff.

Sam

---

**From:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Sent:** Tuesday, December 18, 2018 10:32 AM  
**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** City of Victoria

Sam;

I was going to discuss this with you on our call this week, but I just saw that you had to decline. I want to give you the heads up that I am sending a letter to the Mayor and Council of the City of Victoria to ask if they would like a briefing on AML. As we had discussed previously, I would appreciate it if you or a member of your staff could join us in this briefing. I do not know when it will occur yet, but I wanted to let you know. I will cc you on the letter too.

Jim

Jim Lightbody  
President & CEO

BCLC Head Office



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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-18-18 3:13 PM  
**To:** Jim D. Lightbody  
**Cc:** MacLeod, Sam GPEB:EX  
**Subject:** RE: AML Discussion

Jim

Further on this, - our discussion of the Minister's request to me to collect the information on AML is over a month old and our first request for information on AML is about the same. To date we have not received any actual information.

Would it be possible to start with the bigger picture – AML Organization Chart, job/role descriptions for the various units and the direct cost of the AML Team.

The teams can then drill down for the additional information that Jillian requested and work to provide that.

Thanks  
Sam

---

**From:** Jim D. Lightbody  
**Sent:** Tuesday, December 18, 2018 9:04 AM  
**To:** MacLeod, Sam GPEB:EX  
**Subject:** RE: AML Discussion

Thanks, Sam. This is consistent with my understanding as well. I appreciate your comments and while it wasn't your fault, the apology for the impression on our staff. They will appreciate this as well.

Best regards,  
Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Sent:** Tuesday, December 18, 2018 8:59 AM  
**To:** Jim D. Lightbody <[JDLightbody@bcl.com](mailto:JDLightbody@bcl.com)>  
**Cc:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** AML Discussion

Jim

As you are aware, the Minister has asked us to look at BCLC's current resource allocation to AML in gambling facilities and provide advice on the role the regulator should have in AML going forward. This work will help us respond to R30 (that AML be a responsibility of the regulator) and is the scope of the work Jennifer and Jillian have been coordinating between GPEB and BCLC.

As agreed upon at the December 3<sup>rd</sup> meeting of our ADM Committee, GPEB and BCLC will s 13(1)

Sam

**Sam MacLeod**

Assistant Deputy Minister and

General Manager

Gaming Policy and Enforcement Branch

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-18-18 4:48 PM  
**To:** Jim D. Lightbody  
**Subject:** Automatic reply: AML Discussion

s 22 If this is an urgent matter you may direct your enquiry to Jamie Lewis  
at Jamie.L.Lewis@gov.bc.ca or by phone at 250 952-3120

Please be advised that your message will not auto-forward. Thank you - Sam MacLeod, Assistant Deputy Minister and General Manager, Gaming Policy & Enforcement Branch.

## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-20-18 7:01 AM  
**To:** Jim D. Lightbody  
**Cc:** MacLeod, Sam GPEB:EX  
**Subject:** RE: s 15(1)

Thanks Jim

I did discuss these items with Jillian after we met last week and I know her team is working on them. I agree also on your point on assumptions. I think a formal request and approval process for both GPEB/BCLC would ensure issues are dealt with in a timely manner and that a record of decision/input/feedback is maintained.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Wednesday, December 19, 2018 12:33 PM  
**To:** MacLeod, Sam GPEB:EX  
**Subject:** s 15(1)

Sam;

To follow up on one of our discussion items from last week, as we agreed, I have asked Jennifer Gallaway to follow up with Jillian on our plan to improve s 15(1) as part of BCLC's AML program. s 15(1)

As we go through this current phase of identifying and clarifying roles and responsibilities, I think it is wise for us to ensure we have documented agreement on things like this, so we don't make any assumptions. I hope you understand, but if you'd like to discuss, I'm certainly open to it.

Thanks,  
Jim

Jim Lightbody  
President & CEO

BCLC Head Office  
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2940 Virtual Way, Vancouver BC V5M 0A6  
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## Kevin Simcoe

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-21-18 4:40 PM  
**To:** Jim D. Lightbody; Hazel, Jillian GPEB:EX  
**Cc:** Jennifer Gallaway; Jennifer Keim  
**Subject:** RE: BCLC contact for GCA

Thanks Jim

---

**From:** Jim D. Lightbody  
**Sent:** Friday, December 21, 2018 3:44 PM  
**To:** MacLeod, Sam GPEB:EX ; Hazel, Jillian GPEB:EX  
**Cc:** Jennifer Gallaway ; Jennifer Keim  
**Subject:** BCLC contact for GCA

Sam and Jillian;

I wanted to follow up to confirm that the point person for any GCA amendments where you wish BCLC feedback will continue to be Jennifer Keim, our General Counsel.

Thanks you and Happy Holidays,

Jim

Jim Lightbody  
President & CEO

BCLC Head Office  
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Ts 17(1)

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-21-18 5:05 PM  
**To:** Jim D. Lightbody  
**Cc:** MacLeod, Sam GPEB:EX; Jennifer Gallaway; Hazel, Jillian GPEB:EX  
**Subject:** s 15(1)

Jim

I just wanted to provide some initial thinking/questions/concerns on the BCLC briefing document – s 15(1)

s 15(1)

Again, just initial thoughts Jim and any additional clarification on these points would be helpful. We are looking into these changes in some detail and we will provide a more fulsome response once we have completed our assessment.

Sam

**Sam MacLeod**  
Assistant Deputy Minister and  
General Manager  
Gaming Policy and Enforcement Branch

## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-22-18 6:37 AM  
**To:** Jim D. Lightbody  
**Cc:** Scott, Douglas S AG:EX; Chris Fairclough  
**Subject:** Re: World Jrs

Jim

Thanks so much for the offer but s 22  
the opportunity.

I know there are many ardent fans out there that would enjoy

Thanks again

Sam

Sent from my s 15(1)(l)

On Dec 21, 2018, at 3:55 PM, Jim D. Lightbody <JDLightbody@bclc.com<mailto:JDLightbody@bclc.com>> wrote:

Doug and Sam;

As you may know, BCLC is a sponsor of the IIHF World Jr tournament in Victoria and Vancouver. It aligns with our positioning of BCLC giving back to communities and creating entertainment. We have some tickets available that I would like to offer you for games in Victoria. There are games on Dec 26 (USA vs Slovakia) or Dec 31 (USA vs Finland).

If you are interested, please let us know and I will arrange through Chris Fairclough, to get you a pair of tickets each.

Best wishes and Happy Holidays,

Jim

Jim Lightbody  
President & CEO

BCLC Head Office  
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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-22-18 10:47 AM  
**To:** Jennifer Gallaway  
**Cc:** Jim D. Lightbody; Hazel, Jillian GPEB:EX; Rob Kroeker  
**Subject:** Re: BCLC AML Info

Thanks Jennifer - appreciate that.

Have a awesome Holiday Season

Sam

Sent from my s 15(1)(l)

On Dec 22, 2018, at 10:45 AM, Jennifer Gallaway <JGallaway@BCLC.com<mailto:JGallaway@BCLC.com>> wrote:

Hello Sam,

Please find attached our AML Organizational Chart, and job descriptions for both the AML team as well as other supporting roles that carry out functions essential to support AML Programs.

We are working on a fulsome costing model as well and expect to be able to share that in early January.

Many thanks and if you have any questions, please don't hesitate to let us know.

Happy holidays!

Jennifer Gallaway, MBA  
Interim Director, AML Response  
BCLC  
2940 Virtual Way, Vancouver BC V5M 0A6  
T 604 228 3120 C s 17(1)

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Blog<<http://blogs.bclc.com/>> | bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

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<AML Program FTEs \_ 21 Dec 2018.pdf>

## Kevin Simcoe

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**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** December-24-18 9:00 AM  
**To:** Jim D. Lightbody  
**Cc:** Suzanne Rowley  
**Subject:** RE: s 16

Jim

I believe Rob attended the first meeting and if he and/or John could attend that would be great.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Monday, December 24, 2018 8:55 AM  
**To:** MacLeod, Sam GPEB:EX  
**Cc:** MacLeod, Sam GPEB:EX ; Suzanne Rowley  
**Subject:** Re: s 16

Sam,  
Unfortunately, I have a Board meeting that day that I cannot miss. I can send someone in my place if that works.  
Thanks  
Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Date:** December 24, 2018 at 8:15:16 AM PST  
**To:** Jim D. Lightbody <[JDLightbody@bcl.com](mailto:JDLightbody@bcl.com)>  
**Cc:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** s 16

Jim

Further to our discussion about a possible meeting with s 13(1), s 16 it appears that s 16 initiated by JIGIT to  
engage the s 13(1), s 15(1) is serving the same goal. The  
first meeting of s 16 occurred on October 24<sup>th</sup> and included s 13(1), s 16

s 13(1), s 16

The next meeting of this group is scheduled for January  
23 from 10-12 at s 13(1), s 16 I think it would be beneficial if we both attended this meeting Jim, to demonstrate the  
importance of the issue s 13(1), s 16 I will also be writing s 13(1), s 16 as we discussed.

Sam

**Sam MacLeod**  
Assistant Deputy Minister and  
General Manager  
Gaming Policy and Enforcement Branch

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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-04-19 12:21 PM  
**To:** Jim D. Lightbody  
**Subject:** RE: Toronto

Thanks Jim – I will reach out to them.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Friday, January 4, 2019 12:02 PM  
**To:** MacLeod, Sam GPEB:EX  
**Cc:** MacLeod, Sam GPEB:EX  
**Subject:** Re: Toronto

Happy New Year, Sam

I'd recommend you meet their CEO, Stephen Rigby and Lori Sullivan, their SVP, Governance, Legal and Compliance. Let me know how it goes,  
Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Date:** January 4, 2019 at 11:02:09 AM PST  
**To:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Cc:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** Toronto

Happy New Year Jim

I'm planning a visit to AGCO in the latter part of January to meet with John Major, Tom Munghan and Martha Otton. I also want to meet with OPP Chief Supt William Price to discuss their enforcement strategy.

I thought it might be a good opportunity to meet with OLG folks if they are available. Just wondering who you would recommend?

Thanks

Sam

**Sam MacLeod**

Assistant Deputy Minister and

General Manager

Gaming Policy and Enforcement Branch

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**Kevin Simcoe**

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-07-19 5:18 PM  
**To:** Jim D. Lightbody; Monica Bohm  
**Cc:** MacLeod, Sam GPEB:EX  
**Subject:** FATF Article

Jim/Monica

Page 34 of this Article references the BC investigation.

<http://www.fatf-gafi.org/media/fatf/documents/Professional-Money-Laundering.pdf>

Sam

## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-09-19 5:37 PM  
**To:** Jim D. Lightbody  
**Subject:** RE: Media Request - CBC Vancouver - AML

Thanks Jim – we have suggested using some wording from your Victoria letter but GCPE makes the call.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Wednesday, January 9, 2019 5:15 PM  
**To:** MacLeod, Sam GPEB:EX  
**Subject:** RE: Media Request - CBC Vancouver - AML

Sam;  
I appreciate you reaching out and I appreciate your perspective. Yes, I have seen this one. While it is detailed, we were hoping it didn't come across as defensive, but factual. As you know we have been challenged with third-party opinions and this challenge strikes at our integrity as an organization. It was our intention to answer the CBC's questions accurately and transparently.  
We appreciate your support on this.  
Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Sent:** Wednesday, January 09, 2019 4:39 PM  
**To:** Jim D. Lightbody <[JDLightbody@bclc.com](mailto:JDLightbody@bclc.com)>  
**Subject:** FW: Media Request - CBC Vancouver - AML  
**Importance:** High

Jim

Not sure of your process and whether you review these prior to them coming forward s 13(1)

Sam

---

**From:** Cheng, Rachel GPEB:EX  
**Sent:** Wednesday, January 9, 2019 4:25 PM  
**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** FW: Media Request - CBC Vancouver - AML  
**Importance:** High

---

**From:** BCLC Media Relations <[MediaRelations@bclc.com](mailto:MediaRelations@bclc.com)>  
**Sent:** Wednesday, January 9, 2019 3:47 PM  
**To:** Fellingner, Nicole GCPE:EX <[Nicole.Fellinger@gov.bc.ca](mailto:Nicole.Fellinger@gov.bc.ca)>; Hurrell, Lara GCPE:EX <[Lara.Hurrell@gov.bc.ca](mailto:Lara.Hurrell@gov.bc.ca)>; Duffus, Robert GCPE:EX <[Robert.Duffus@gov.bc.ca](mailto:Robert.Duffus@gov.bc.ca)>  
**Cc:** Evan Kelly <[EKelly@bclc.com](mailto:EKelly@bclc.com)>; Harper, Aimee GPEB:EX <[Aimee.Harper@gov.bc.ca](mailto:Aimee.Harper@gov.bc.ca)>; Henderson, Jeff



GPEB:EX <[Jeff.Henderson@gov.bc.ca](mailto:Jeff.Henderson@gov.bc.ca)>; Lara Gerrits <[L.Gerrits@bclc.com](mailto:L.Gerrits@bclc.com)>; XT:Piva-Babcock, Laura FIN:IN <[lpiva-babcock@bclc.com](mailto:lpiva-babcock@bclc.com)>; Lewis, Jamie GPEB:EX <[Jamie.L.Lewis@gov.bc.ca](mailto:Jamie.L.Lewis@gov.bc.ca)>; Monica Bohm <[MBohm@bclc.com](mailto:MBohm@bclc.com)>; Cheng, Rachel GPEB:EX <[Rachel.Cheng@gov.bc.ca](mailto:Rachel.Cheng@gov.bc.ca)>; Cousins, Sabrina GPEB:EX <[Sabrina.Cousins@gov.bc.ca](mailto:Sabrina.Cousins@gov.bc.ca)>; Sarah Morris <[SMorris@bclc.com](mailto:SMorris@bclc.com)>

**Subject:** Media Request - CBC Vancouver - AML

**Importance:** High

Good afternoon,

The CBC has asked for a response/interview with the BCLC regarding some of the points raised in the reports outlined below. We do not have a spokesperson available but have drafted a response in the attached.

Please advise if we can send it along—hoping to meet reporter's 6pm deadline.

Thank you.  
Sarah

**Reporter/Outlet:** Eric Rankin (and Paisley Woodward) / CBC Vancouver / [eric.rankin@cbc.ca](mailto:eric.rankin@cbc.ca)

**Deadline:** 6pm, today (January 9, 2019)

**Background/email correspondence:**

*Through a Freedom of Information request, we have obtained reports written by senior investigators with the Gaming Policy and Enforcement Branch. These reports, completed in October of 2013 and 2014, were sent to senior GPEB management, as well as officials with the BC Lottery Corporation and the ADM for gaming enforcement.*

*The 2013 report shows senior GPEB investigators were deeply alarmed over the increase in suspicious currency transactions pouring through BC casinos. One section states that suspicious currency transactions were coming very close to \$100 million PER YEAR.*

*The 2014 report highlights concern over the "significant and rapid acceleration of suspicious cash coming into predominately lower mainland casinos" which "again indicate(s) that all money-laundering measures that have been put into place since 2008 have not slowed or decreased the flow of suspicious currency coming into our casinos." The "again" refers to a similar conclusion in the previous October 2013 report.*

*The 2014 report also projected that suspicious cash transactions in 2014 would total more than \$185 million. A check by CBC News of the actual year-end figure shows the GPEB projection was very accurate.*

*Approximately 4 weeks after the October 2014 report was forwarded to BCLC and others, the 2 main authors-- GPEB's senior director of investigations Joe Schalk and executive director Larry Vander Graaf -- were dismissed.*

**Request:**

- 1) Joe Schalk says executives with BCLC wanted him to stop raising the alarm over money laundering. Schalk says he believes BCLC "was willfully blind" to what was happening. What is BCLC's response?
- 2) Joe Schalk says hard numbers and his projections show BC casinos handled approx. \$1 billion in suspicious cash transactions from 2010 to 2016. Our check of the figures provided through FOI's and compared to figures supplied by BCLC show the figure was at least somewhere between \$700 and \$800 million-- far in excess of the \$100 million-plus guessed by Peter German following his "Dirty Money" report. What is BCLC's reaction to the \$700 million to \$1 billion range of figures?

Response: On background (see attached)



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**Questions:**

- 1) Joe Schalk says executives with BCLC wanted him to stop raising the alarm over money laundering. Schalk says he believes BCLC "was willfully blind" to what was happening. What is BCLC's response?

**BCLC response:**

These claims are categorically false. BCLC and its employees recognized the risk that money-laundering poses to casinos, took action and continue to take action to increase controls as new threats emerge.

BCLC is one of five organizations responsible for mitigating the money-laundering risk to B.C. casinos, along with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), the Gaming Policy and Enforcement Branch (GPEB), Service Providers and police. BCLC's role and authority is to monitor for and report incidents of suspected illegal activity; the Corporation has no law enforcement or investigative powers.

BCLC reports all suspicious financial transactions to FINTRAC, GPEB and RCMP. BCLC also reports all conduct, activity or incident that involves the potential commission of an offence under the Criminal Code or Gaming Control Act to GPEB and law enforcement for potential investigation.

Beginning in 2012, BCLC identified concerns related to possible illegal activity in B.C. casinos and took action – including with increased customer due diligence efforts such as more in-depth interviews with customers where concerns around source of cash and source of wealth arose.

Our action continued into 2014 and 2015, when BCLC flagged its concerns to police and GPEB in numerous meetings. This includes a November 2014 meeting in which BCLC presented a proposal to the Combined Forces Special Enforcement Unit (CFSEU) for a targeted investigation of BCLC's list of individuals who appeared to be engaging in criminal activity in proximity to gaming facilities. It also includes a February 2015 meeting during which BCLC requested the RCMP's Federal Serious and Organized Crime (FSOC) consider initiating an investigation based on information BCLC had collected related to cash drops at casinos by an individual believed to be associated to organized crime. Shortly thereafter, RCMP advised BCLC of the start of its E-Pirate multinational money-laundering investigation.

In 2015 (and expanded on in 2018), BCLC implemented source of funds requirements for transactions of \$10,000 or more that include conducting background checks, including inquiries into the source and net worth of the customer, and requiring casino operators to collect and record specified information on customers' source of buy-in funds each transaction. In addition, the customer is required to affirm the accuracy of this information by signing a declaration in order to conduct the transaction. Where warranted, BCLC may place conditions on the customer's use of cash or ban a customer from conducting any transactions at casinos in B.C.

BCLC implemented the Reasonable Measures process in 2017 in alignment with new federal regulations and to monitor and control third-party transactions. Casino operators are required to ascertain and document the ownership of funds for all cash buy-ins and disbursements of \$10,000 or more within a 24-hour period.

Following BCLC's ongoing actions and commitment to improving its anti-money laundering controls, suspicious transactions in B.C. casinos reduced significantly since 2015, as outlined in the data previously provided to CBC and as demonstrated in the attached chart.

- 2) **Joe Schalk says hard numbers and his projections show BC casinos handled approx. \$1 billion in suspicious cash transactions from 2010 to 2016. Our check of the figures provided through FOI's and compared to figures supplied by BCLC show the figure was at least somewhere between \$700 and \$800 million-- far in excess of the \$100 million-plus guessed by Peter German following his "Dirty Money" report. What is BCLC's reaction to the \$700 million to \$1 billion range of figures?**

**BCLC response:**

BCLC can't speak to others' estimates as we are not privy to how those calculations were completed.

Our industry, regulators and law enforcement share the public's concern about money laundering in the province and we have taken, and continue to take, actions to mitigate the ever-evolving risks of criminal activity.

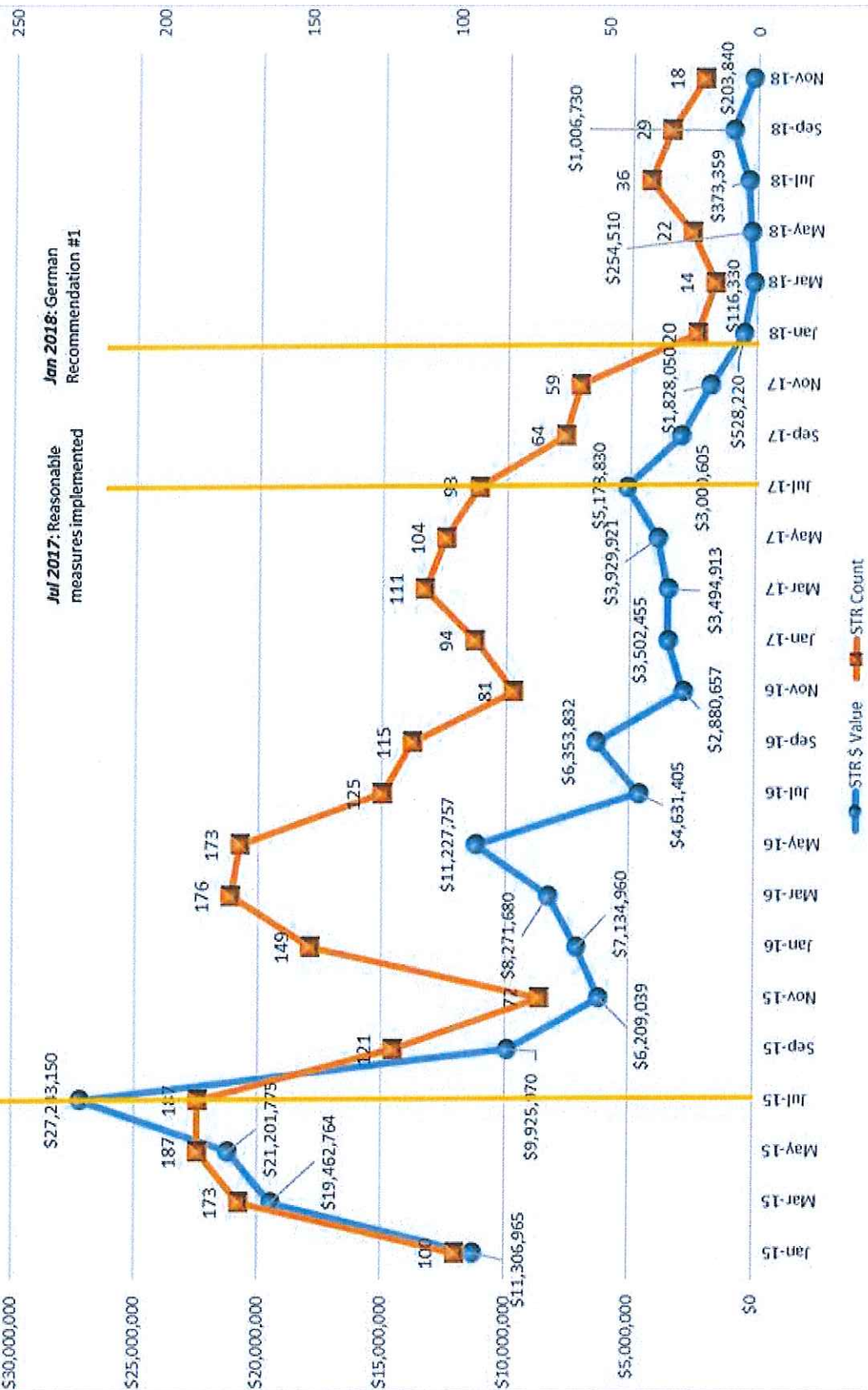
BCLC reports every suspicious transaction to FINTRAC and provides copies of those reports to police and GPEB for investigation of any money laundering or terrorist financing activities. In addition, where BCLC believes there are indicators of criminals targeting casinos, it will take additional steps to alert police and request investigation as it did with E-Pirate. Where police or GPEB conduct an investigation, BCLC will provide any support and take any actions requested of it by police or GPEB.

In concert with Casino Service Providers, regulators (GPEB and FINTRAC) and law enforcement, we remain steadfast in our commitment to ensuring that gambling facilities remain safe for players, employees and communities.

BCLC is actively working with the Province to address the recommendations in Dr. Peter German's review and, together, we have completed nine of the 48 recommendations from Dr. German's review.

# Suspicious Financial Transaction - Value & Count January 2015 - November 2018

Jul 2015: Intro of BCLC  
Source of Funds Requirement



## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-10-19 2:18 PM  
**To:** Jim D. Lightbody  
**Cc:** Harper, Aimee GPEB:EX  
**Subject:** RE: Media Request - CBC Vancouver - AML

Jim

That would be good and they can go to Aimee Harper (cc'd) and she can then disseminate as appropriate within GPEB.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Thursday, January 10, 2019 1:22 PM  
**To:** MacLeod, Sam GPEB:EX  
**Subject:** RE: Media Request - CBC Vancouver - AML

Sam;  
I couldn't agree more. Thank you for recognizing and appreciating this. It has put our teams in difficult positions and moving forward this should improve the efficiency and effectiveness for responding to media requests. This is a great example of us clarifying roles and responsibilities.

If you agree it would be helpful, we could provide whomever you designate, a copy of the final message or release that goes to the media. Let me know on that.

Thanks,

Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Sent:** Thursday, January 10, 2019 1:10 PM  
**To:** Jim D. Lightbody <[JDLightbody@bccl.com](mailto:JDLightbody@bccl.com)>  
**Subject:** RE: Media Request - CBC Vancouver - AML

Jim

This back and forth left me wondering why GPEB needs to review your media releases. I spoke to my staff here as to the history/requirement for this and was advised it was at the request of GCPE. I see absolutely no need for this oversight/check and balance and will be advising GCPE and my folks that we will not continue that practice in the future.

Sam

---

**From:** Jim D. Lightbody <[JDLightbody@bccl.com](mailto:JDLightbody@bccl.com)>  
**Sent:** Wednesday, January 9, 2019 5:15 PM  
**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>  
**Subject:** RE: Media Request - CBC Vancouver - AML



Sam;

I appreciate you reaching out and I appreciate your perspective. Yes, I have seen this one. While it is detailed, we were hoping it didn't come across as defensive, but factual. As you know we have been challenged with third-party opinions and this challenge strikes at our integrity as an organization. It was our intention to answer the CBC's questions accurately and transparently.

We appreciate your support on this.

Jim

---

**From:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>

**Sent:** Wednesday, January 09, 2019 4:39 PM

**To:** Jim D. Lightbody <[JDLightbody@bclc.com](mailto:JDLightbody@bclc.com)>

**Subject:** FW: Media Request - CBC Vancouver - AML

**Importance:** High

Jim

Not sure of your process and whether you review these prior to them coming forward<sup>s</sup> 13(1)

Sam

---

**From:** Cheng, Rachel GPEB:EX

**Sent:** Wednesday, January 9, 2019 4:25 PM

**To:** MacLeod, Sam GPEB:EX <[Sam.MacLeod@gov.bc.ca](mailto:Sam.MacLeod@gov.bc.ca)>

**Subject:** FW: Media Request - CBC Vancouver - AML

**Importance:** High

---

**From:** BCLC Media Relations <[MediaRelations@bclc.com](mailto:MediaRelations@bclc.com)>

**Sent:** Wednesday, January 9, 2019 3:47 PM

**To:** Fellingner, Nicole GCPE:EX <[Nicole.Fellinger@gov.bc.ca](mailto:Nicole.Fellinger@gov.bc.ca)>; Hurrell, Lara GCPE:EX <[Lara.Hurrell@gov.bc.ca](mailto:Lara.Hurrell@gov.bc.ca)>;

Duffus, Robert GCPE:EX <[Robert.Duffus@gov.bc.ca](mailto:Robert.Duffus@gov.bc.ca)>

**Cc:** Evan Kelly <[EKelly@bclc.com](mailto:EKelly@bclc.com)>; Harper, Aimee GPEB:EX <[Aimee.Harper@gov.bc.ca](mailto:Aimee.Harper@gov.bc.ca)>; Henderson, Jeff

GPEB:EX <[Jeff.Henderson@gov.bc.ca](mailto:Jeff.Henderson@gov.bc.ca)>; Lara Gerrits <[LGerrits@bclc.com](mailto:LGerrits@bclc.com)>; XT:Piva-Babcock, Laura FIN:IN

<[lpiva-babcock@bclc.com](mailto:lpiva-babcock@bclc.com)>; Lewis, Jamie GPEB:EX <[Jamie.L.Lewis@gov.bc.ca](mailto:Jamie.L.Lewis@gov.bc.ca)>; Monica Bohm

<[MBohm@bclc.com](mailto:MBohm@bclc.com)>; Cheng, Rachel GPEB:EX <[Rachel.Cheng@gov.bc.ca](mailto:Rachel.Cheng@gov.bc.ca)>; Cousins, Sabrina GPEB:EX

<[Sabrina.Cousins@gov.bc.ca](mailto:Sabrina.Cousins@gov.bc.ca)>; Sarah Morris <[SMorris@bclc.com](mailto:SMorris@bclc.com)>

**Subject:** Media Request - CBC Vancouver - AML

**Importance:** High

Good afternoon,

The CBC has asked for a response/interview with the BCLC regarding some of the points raised in the reports outlined below. We do not have a spokesperson available but have drafted a response in the attached.

Please advise if we can send it along—hoping to meet reporter's 6pm deadline.

Thank you.

Sarah

**Reporter/Outlet:** Eric Rankin (and Paisley Woodward) / CBC Vancouver / [eric.rankin@cbc.ca](mailto:eric.rankin@cbc.ca)

**Deadline: 6pm, today (January 9, 2019)**

**Background/email correspondence:**

*Through a Freedom of Information request, we have obtained reports written by senior investigators with the Gaming Policy and Enforcement Branch. These reports, completed in October of 2013 and 2014, were sent to senior GPEB management, as well as officials with the BC Lottery Corporation and the ADM for gaming enforcement.*

*The 2013 report shows senior GPEB investigators were deeply alarmed over the increase in suspicious currency transactions pouring through BC casinos. One section states that suspicious currency transactions were coming very close to \$100 million PER YEAR.*

*The 2014 report highlights concern over the "significant and rapid acceleration of suspicious cash coming into predominately lower mainland casinos" which "again indicate(s) that all money-laundering measures that have been put into place since 2008 have not slowed or decreased the flow of suspicious currency coming into our casinos." The "again" refers to a similar conclusion in the previous October 2013 report.*

*The 2014 report also projected that suspicious cash transactions in 2014 would total more than \$185 million. A check by CBC News of the actual year-end figure shows the GPEB projection was very accurate.*

*Approximately 4 weeks after the October 2014 report was forwarded to BCLC and others, the 2 main authors-- GPEB's senior director of investigations Joe Schalk and executive director Larry Vander Graaf -- were dismissed.*

**Request:**

- 1) Joe Schalk says executives with BCLC wanted him to stop raising the alarm over money laundering. Schalk says he believes BCLC "was willfully blind" to what was happening. What is BCLC's response?**
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**Response: On background (see attached)**

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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-17-19 7:17 AM  
**To:** Rob Kroeker; Hazel, Jillian GPEB:EX; Jennifer Gallaway; Anna Fitzgerald; Cary Skrine  
**Cc:** Jim D. Lightbody  
**Subject:** RE: For Info: New Guidance on suspicious transactions - FINTRAC

Thanks for sharing this Rob.

Sam

---

**From:** Rob Kroeker  
**Sent:** Thursday, January 17, 2019 7:04 AM  
**To:** MacLeod, Sam GPEB:EX ; Hazel, Jillian GPEB:EX ; Jennifer Gallaway ; Fitzgerald, Anna GPEB:EX ; Skrine, Cary J GPEB:EX  
**Cc:** Jim D. Lightbody  
**Subject:** For Info: New Guidance on suspicious transactions - FINTRAC

Last year the federal Dept of Finance and Fintrac approached provincial gaming crowns and others to work on updating Fintrac's suspicious transaction guidance. The provincial crowns created a working group to support that work and BCLC participated in the working group. The new guidance was published today.

The newly published indicators of money laundering and terrorist financing in the casino sector may be found here:  
[http://www.fintrac-canafe.gc.ca/guidance-directives/transaction-operation/indicators-indicateurs/casinos\\_mltf-eng.asp](http://www.fintrac-canafe.gc.ca/guidance-directives/transaction-operation/indicators-indicateurs/casinos_mltf-eng.asp)

This guideline is FINTRAC's interpretation of the statutory language and reflects the requirements to which it will expect reporting entities to comply.

Regards,

**Rob Kroeker**

Chief Compliance Officer & VP Legal, Compliance, Security  
British Columbia Lottery Corporation

2940 Virtual Way, Vancouver BC V5M 0A6  
T 604.228.3077 | Ms 17(1) | F 604.225.6488

Connect with us:  
Twitter @BCLC | Facebook BCCasinos | Blog | bclc.com

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.



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## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-24-19 2:59 PM  
**To:** Jim D. Lightbody  
**Subject:** s 13(1), s 15(1)

Thanks Jim

Sent from my s 15(1)(f)

On Jan 24, 2019, at 2:08 PM, Jim D. Lightbody <JDLightbody@bclc.com<mailto:JDLightbody@bclc.com>> wrote:

Sam;  
I want to provide this to you. I also am providing to Doug, Derrick and Megan. They asked for s 13(1), s 15(1)  
We can discuss tomorrow.  
Cheers,  
Jim

---

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s 13(1), s 15(1)

## Kevin Simcoe

---

**From:** Jim D. Lightbody  
**Sent:** January-25-19 9:08 AM  
**To:** Sam MacLeod  
**Subject:** Call this morning

Sam;  
Are you able to do our call this morning?  
Cheers,  
Jim

**Jim Lightbody**  
President & CEO

BCLC Head Office  
74 West Seymour Street, Kamloops BC V2C 1E2  
Ts 17(1)

BCLC Marketing & Sales Office  
2940 Virtual Way, Vancouver BC V5M 0A6  
Ts 17(1)

[jdlightbody@bclc.com](mailto:jdlightbody@bclc.com)  
[bclc.com](http://bclc.com)

**Kevin Simcoe**

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-25-19 9:44 AM  
**To:** Jim D. Lightbody  
**Subject:** 557997 - BN - Unregulated Online Gambling Update  
**Attachments:** 557997 - BN - Unregulated Online Gambling Update.pdf

Jim

As discussed.

Sam

**Sam MacLeod**  
Assistant Deputy Minister and  
General Manager  
Gaming Policy and Enforcement Branch

**MINISTRY OF ATTORNEY GENERAL  
GAMING POLICY AND ENFORCEMENT BRANCH  
BRIEFING NOTE**

**PURPOSE:** For INFORMATION for Sam MacLeod  
Assistant Deputy Minister, GPEB

**ISSUE:** Status update on efforts to address unregulated online gambling

**SUMMARY:**

- The Gaming Policy and Enforcement Branch (GPEB), Legal Services Branch (LSB), and the British Columbia Lottery Corporation (BCLC) are continuing work to address unregulated online gambling, including:

- s 13(1), s 14

- GPEB-BCLC Online Gambling Working Group: meeting monthly and undertaking analysis of options;
- Online gambling prevalence study: A final report measuring the prevalence of online gambling in BC will be complete in February. Analysis is underway to compare the findings with BCLC data;
- Complaint to Advertising Standards Canada (ASC): Regulators in BC, Alberta, Manitoba, and Nova Scotia have made a complaint to the ASC about the advertisement of unregulated gambling sites. s 13(1)  
the regulators to resubmit as separate complaints for each advertiser; and
- s 13(1)

**BACKGROUND:**

- PlayNow.com, BCLC's online gambling platform, is BC's only commercial online gambling platform that operates within the legal framework created by the *Criminal Code* and BC's *Gaming Control Act* (GCA). All other commercial online gambling platforms operate outside the legal framework. This exposes BC patrons to risks such as fraud, changing odds, lack of responsible gambling features, and access by minors.
- The Attorney General (AG) has provided direction to GPEB and BCLC to form a working group to jointly explore options to address unregulated online gambling websites. s 14

#### *BCLC-GPEB Online Gambling Working Group*

- GPEB and BCLC have formed a working group that meets monthly. The terms of reference have been signed off and the group's mandate is "to provide advice, information, and data, as well as to make recommendations jointly to address unregulated online gambling in BC."
- The working group is considering three main options (the options):  
s 13(1)
- In early 2018, BCLC contracted Ernst & Young (EY) to conduct an impact analysis of the options, s 13(1) BCLC and GPEB are undertaking further analysis to refine assumptions and the likelihood of success of each option.
- Essential to the analysis of each option is the legal feasibility under the *Criminal Code*.  
s 13(1), s 14

#### *Online Gambling Prevalence Survey*

- GPEB and BC Stats contracted RA Malatest and Associates to conduct a population survey of the prevalence of online gambling among British Columbians. The intent of the survey is to seek data to inform the analysis of options. The survey asked respondents about their online gambling participation and play frequency on PlayNow.com as well as unregulated sites.
- Malatest will provide a final report and presentation to GPEB on February 6, 2019.
- GPEB and BCLC are jointly reviewing the draft report s 13(1)
- GPEB's Responsible and Problem Gambling team and BCLC's Player Health team are also jointly conducting an additional study to understand problem gambling prevalence among online gamblers. s 13(1)  
Completion of this study also fulfills a commitment from the Plan for Public Health and Gambling.

*Provincial Regulators' Complaint to Advertising Standards Canada (ASC)*

- The widespread advertising of unregulated gambling websites on television, radio and the internet creates the illusion that these sites are offering services that are safe and secure for BC residents.
- GPEB led other provincial regulators in sending an official complaint to the ASC in December 2018. The signatories included the heads of GPEB; Alberta Gaming, Liquor & Cannabis; Liquor, Gaming and Cannabis Authority of Manitoba; and The Alcohol, Gaming, Fuel and Tobacco Division of Service Nova Scotia.
- The complaint outlined instances in which unregulated online gambling platforms had violated the Canadian Code of Advertising Standards. It requested that the ASC instruct unregulated online gambling providers to withdraw their ads and provide notification that similar advertising is not permitted by Canadian media.
- ASC's Vice President, Standards, responded with a request to revise the complaint and resubmit as four separate complaints – one for each advertiser and their alleged violations. This will allow ASC to forward complaints directly to the advertisers for their response. In the initial response, the ASC has advised that complaints about advertising to 18-year-olds in provinces where the minimum gambling age is 19 have the most merit.

s 13(1), s 16, s 17(1)

Prepared by:  
Kirk Hepburn  
Policy Analyst  
Gaming Policy and Enforcement Branch  
778 974-3451

Approved by:  
Jillian Hazel  
Executive Director  
Gaming Policy and Enforcement Branch  
778 698-2223



## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-30-19 9:21 AM  
**To:** Jim D. Lightbody  
**Cc:** Anna Fitzgerald; Hazel, Jillian GPEB:EX  
**Subject:** Fwd: Decision Note

Jim

I've cc'd Jillian/Anna for their info/assistance as required.

Sam

Sent from my<sup>s</sup> 15(1)(l)

Begin forwarded message:

From: "Scott, Douglas S AG:EX" <Douglas.S.Scott@gov.bc.ca<mailto:Douglas.S.Scott@gov.bc.ca>>  
Date: January 30, 2019 at 11:35:44 AM EST  
To: "JDLightbody@bclc.com<mailto:JDLightbody@bclc.com>" <JDLightbody@bclc.com<mailto:JDLightbody@bclc.com>>,  
"MacLeod, Sam GPEB:EX" <Sam.MacLeod@gov.bc.ca<mailto:Sam.MacLeod@gov.bc.ca>>  
Subject: Decision Note

Morning Jim,

Sam and I discussed this during our meeting Monday. s 13(1), s 15(1)

If you could work with Sam's team on that. I believe Sam would like Anna to be the point for GPEB.

Thanks

Doug

Douglas S. Scott  
Associate Deputy Minister  
Ministry of Attorney General

## Kevin Simcoe

---

**From:** MacLeod, Sam GPEB:EX <Sam.MacLeod@gov.bc.ca>  
**Sent:** January-30-19 4:33 PM  
**To:** Jim D. Lightbody  
**Cc:** Rob Kroeker; Anna Fitzgerald; Cary Skrine; Vear, Maureen GPEB:EX  
**Subject:** s 16

Thanks Jim

I am in TO until Friday but would like to discuss. I will ask Maureen to set up a call.

Sam

---

**From:** Jim D. Lightbody  
**Sent:** Wednesday, January 30, 2019 4:28 PM  
**To:** MacLeod, Sam GPEB:EX  
**Cc:** Rob Kroeker  
**Subject:** s 16

Sam;  
s 17(1), s 21

If you or anyone in your organization want to discuss, please advise Rob or myself.

Best regards,  
Jim

---

**From:** Rob Kroeker <[RKroeker@bcllc.com](mailto:RKroeker@bcllc.com)>  
**Sent:** Wednesday, January 30, 2019 4:00 PM  
**To:** Jim D. Lightbody <[JDLightbody@bcllc.com](mailto:JDLightbody@bcllc.com)>  
**Subject:**

---

This email is intended only for the addressee. It may contain confidential or proprietary information that cannot be disclosed without BCLC's permission. If you have received this email in error, please notify the sender immediately and delete the email.



*Know your limit, play within it.*

November 7, 2018

Jim Lightbody  
CEO, British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

Dear Jim:

Re: October 10, 2018 letter regarding VIP Operational Standards, Policies & Procedure

Thank you for your October 10, 2018, letter regarding recommendations for the development and implementation of VIP Operational Standards, Policies & Procedures. I appreciate your commitment for BCLC to immediately undertake the work necessary to draft policies and procedures that will govern service provider interactions with VIP customers.

In response to your request for clarification of the definition of VIP rooms and based on the findings and conclusions of the GPEB Final Investigation Report on Casino VIP Operations, the focus for policy development should be the private VIP rooms in facilities.

I have considered your comments related to expanding the requirement for corporate rather than personnel registration for all service provider employees who have a role in VIP operations. At this time, GPEB will continue with the requirement for one VIP room guest services director (or equivalent) for each of the five lower mainland casinos while continuing to assess the need to expand the registration as you have suggested.

In relation to your suggestion that all senior hosting staff report directly to the general manager of a facility, I've asked the Director of Corporate Registration to have further discussions with your staff to understand the potential benefits of such a requirement and GPEB's authority to do so.

.. /2

We look forward to working closely with your BCLC team to ensure that effective controls are implemented for service provider interactions with VIP players understanding that any BCLC policy must not contravene labour or tax laws or have BCLC standing in place of the service provider as the employer.

Sincerely,

Sam MacLeod

s 22

Assistant Deputy Minister and General Manager,  
Gaming Policy and Enforcement Branch

cc. Kim Bruce, ED, LRC Division  
Brad Desmarais, BP, Casino & Community Gaming, BCLC  
Rob Krocker, CCO & VP, Legal, Compliance, Security

CLIFF: 555930



December 4, 2018

556862

Mr. Jim Lightbody, CEO  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V2C 1E2

s 15(1)

Dear Jim:

s 15(1)

Sincerely,

s 22

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General

**Ministry of  
Attorney General**

Gaming Policy and  
Enforcement Branch  
Assistant Deputy  
Minister's office

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December 7, 2018

556914

Mr. Jim Lightbody  
President and CEO  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver BC V5M 0A6

Dear Jim:

I am writing to inform you of a change in the GPEB executive team.

Michele Jaggi-Smith, Executive Director, Strategic Policy and Projects Division (SPPD), has accepted a position with the Ministry of Transportation. Michele's last day is Dec. 7, 2018. Effective Dec. 10, 2018, Jillian Hazel will assume the role of A/Executive Director, SPPD, while maintaining responsibility and oversight of the Anti-Money Laundering Project Team.

We are very grateful for Michele's seven years of excellent service to GPEB and wish her well in her future endeavours.

Sincerely,

s 22

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General

**GPEB is a 2018 recipient of the BC Public Service Top Work Unit Award**

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December 11, 2018

557029

Jim Lightbody, Chief Executive Officer,  
BC Lottery Corporation  
2940 Virtual Way  
Vancouver, BC  
V5M 0A6

Dear Mr. Lightbody,

As you are aware, the Gaming Policy and Enforcement Branch (GPEB) is responsible for the overall integrity of gambling in the province. Under section 34(1)(f)(i) of the Gaming Control Regulation, it is a condition of registration for gaming service providers to obey the standard operating procedures (BCLC Standards) and rules of play set out by the British Columbia Lottery Corporation (BCLC).

GPEB considers the Source of Funds Policy BCLC, implemented in January 2018 and incorporated into the Standards in September 2018, an integral control in anti-money laundering efforts, and service provider compliance with this policy is critical for upholding the integrity of gambling in BC.

GPEB conducted an audit of transactions from May to June 2018 and a follow up audit of transactions in August 2018 at the five largest Lower Mainland casinos to verify compliance to BCLC's Source of Funds Policy. Our audit found non-compliance with this policy, specifically around incomplete or missing documentation required to substantiate the source of the patron's funds. In addition, preliminary results from the work being performed by Deloitte have identified continued non-compliance with Source of Funds Policy.

As a result of these findings, I sent letters on November 28, 2018 to the three largest casino service providers in the Lower Mainland outlining GPEB's expectations of their compliance with BCLC's Source of Funds Policy. These letters outlined that continued non-compliance will result in escalating administrative sanctions, which could include additional conditions being imposed on their registration, fines, suspensions and/or cancellation of registration.

/2

Ministry of  
Attorney General

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GPEB's audits also found service provider confusion during the roll-out of the Source of Funds Policy. The policy has been in effect for 11 months and formally incorporated into BCLC Standards for two months, yet non-compliance remains at unacceptable levels. As BCLC is responsible for the conduct and management of gambling in the province, including the implementation of this policy, GPEB requests that BCLC support service providers in their efforts to achieve and maintain full compliance. This may include analysis to determine the reasons behind non-compliance and additional training and increased onsite support from BCLC as necessary.

GPEB expects service providers to be in full compliance as required under section 34(1)(f)(i) of the Gaming Control Regulation. GPEB will be conducting another source of funds audit in early 2019 to review BCLC's program and to verify service provider compliance with the policy.

GPEB is committed to ensuring the integrity of gambling in BC and supporting BCLC in its anti-money laundering efforts.

Sincerely,

s 22

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch

**GPEB is a 2018 recipient of the BC Public Service Top Work Unit Award**

December 17, 2018

Gaming Policy & Enforcement Branch  
3rd Floor - 910 Government Street  
PO BOX 9310 STN PROV GOVT  
Victoria, BC V8W 9N1

Attention: **Sam MacLeod**  
Assistant Deputy Minister

Dear Sam:

**Re: Source of Funds Declaration Identification Threshold**

Thank you for your letter dated December 4, 2018 regarding the British Columbia Lottery Corporation's (BCLC) amended Source of Funds (SOF) Declaration Identification Threshold policy. These amendments are intended to mitigate risk related to the increased source of funds requirements and the associated shift in player behavior towards lower buy-in amounts. We appreciate your feedback and will continue keeping the Gaming Policy and Enforcement Branch (GPEB) apprised of any further actions or developments related to this policy.


As per your recommendation, we will be sharing this information with the Anti-Money Laundering (AML) Deputy Minister's Committee prior to implementation. As per BCLC's usual practice for procedural changes, we will provide detailed notice and implementation instructions to service providers on this change as well as in-person training and support as needed. BCLC will take this opportunity to remind service providers of their obligations in regard to the identification and reporting of all suspicious transactions.

The date the policy will take effect has not yet been confirmed, but will occur in early 2019

Thank you again for taking the time to provide us with your comments and feedback.

Yours truly,

s 22

 Jim Lightbody  
President & CEO



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*Know your limit, play within it.*

January 18, 2019

Cliff #557971

Jim Lightbody, Chief Executive Officer,  
BC Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

Dear Mr. Lightbody,

Thank you for your email on December 11, 2018 which shared the BCLC Action Plan Response to the recent FINTRAC examination and cover letter. We are also in receipt of FINTRAC'S acknowledgement of your plan dated December 19, 2018. I apologize for the delay in my response.

My team will be reaching out to your AML unit to request more detail about how the plan will be implemented. GPEB will be monitoring the plan's implementation progress, which may also include audit work.

We look forward to continuing to work together with BCLC in this regard.

Sincerely,

s 22

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch

**GPEB is a 2018 recipient of the BC Public Service Top Work Unit Award**

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Attorney General**

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*Know your limit, play within it.*

January 24, 2019

Cliff: 558176

Jim Lightbody  
President and CEO  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

**Updated GPEB Policy Framework for Novelty Betting**

Dear Mr. Lightbody:

The Gaming Policy and Enforcement Branch has recently updated the policy framework for novelty betting PlayNow.com in order to:

- clarify the applicable legislation and standards that BCLC must follow in offering novelty betting,
- ensure that the definition of novelty betting is consistent between the technical gaming standards and the policy framework, and,
- consolidate and clarify the special considerations applicable to novelty betting.

Please review the revised policy and acknowledge your acceptance of the terms by way of email to David.Nicholson@gov.bc.ca. Please contact us if you have any questions or concerns.

Sincerely,

s 22

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch

*Attach.*

**GPEB is a 2018 recipient of the BC Public Service Top Work Unit Award**

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## GPEB Policy Framework for Novelty Betting in British Columbia

### Context

The Gaming Policy and Enforcement Branch (GPEB) has updated and reissued this policy framework for novelty bets offered by the British Columbia Lottery Corporation (BCLC). This policy framework covers novelty bet types currently known and permitted by law.

### Objectives

- To ensure the integrity of gaming in British Columbia.
- To clarify the standards that apply to novelty betting in British Columbia.

### Authority and Application

Section 27(2)(d) of the *Gaming Control Act* authorizes the General Manager of GPEB to establish public interest standards for the gambling industry. The following public interest standards apply to BCLC and all other gaming services providers.

### Definition

- Novelty bets are wagers on events/markets which will result in the future and whose outcomes are determined by occurrences independent of BCLC.
- Novelty bets will not be based on the outcome of, or contingencies occurring within, a sporting event, race, fight, or athletic contest (e.g. final scores, half-time scores, placement of contestants, etc.).

### Applicable Laws, Policies and Public Interest Standards

BCLC must ensure novelty betting activities are conducted in compliance with the applicable laws, policies and public interest standards, including:

- *Criminal Code* of Canada
- *Gaming Control Act*
- Gaming Control Regulation
- TGS5 - Technical Gambling Standards for Internet Gambling Systems (IGSs) Technical Standards Document (TSD)
- Responsible Gambling Standards for the BC Gambling Industry
- Advertising and Marketing Standards for Gambling in British Columbia
- Relevant privacy legislation.

Issued by:

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General  
January 24, 2019

February 4, 2019

Gaming Policy & Enforcement Branch  
3rd Floor - 910 Government Street  
PO BOX 9310 STN PROV GOVT  
Victoria, BC V8W 9N1

Attention: **Sam MacLeod**  
Assistant Deputy Minister

Dear Sam:

**Re: Status Update on Implementing Recommendations from the Plan for  
Public Health & Gambling**

As per the requirements in BCLC's Mandate Letter, please find attached a copy of the joint BCLC/GPEB status update on the progress BCLC is making implementing the recommendations from the Plan for Public Health and Gambling. I am pleased to report on some significant developments since the last report to the Ministry of the Attorney General:


- BCLC has completed technical testing of PlayPlanner, a new time and money budgeting tool available to Encore members, and a province-wide rollout is planned for this summer.
- The GameSense Advisor program continues to expand into all facilities province-wide, with completion anticipated by September 2019. Research to date indicates that customers who interact with GameSense Advisors are more likely to be aware of player health resources and feel they are more educated and equipped for informed play.
- BCLC and GPEB signed a new agreement in November 2018 to renew funding to the Centre for Gambling Research at UBC through to FY 2022/23.

BCLC and GPEB continue to work collaboratively to enhance the overall health of our player population through these commitments and other priority areas of our business. Our ongoing efforts to continuously renew and improve our player health programs and initiatives will help make gambling in British Columbia as safe and enjoyable as possible. Thank you to your organization for working with us on this very important priority.

Should you have any questions please do not hesitate to contact me.

Yours truly

s 22

 Jim Lightbody  
President & CEO

cc: File

Enclosures x1



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## Plan for Public Health and Gambling Status Summary

Commitment Category	Total number of Commitments 21			Number of Completed Commitments 13			Number of Outstanding Commitments 8		
	GPEB	BCLC	Joint	GPEB	BCLC	Joint	GPEB	BCLC	Joint
<i>Problem Gambling Prevention for Youth and Young Adults</i>	5	0	0	5	0	0	0	0	0
<i>Promoting Healthy Choices</i>	0	8	2	0	4	0	1	4	1
<i>Problem Gambling Support and Treatment Services</i>	1	0	0	1	0	0	0	0	0
<i>Responsible and Problem Gambling Policy and Research</i>	1	0	4	1	0	2	0	0	2
<b>TOTAL</b>	7	8	6	7	4	2	1	4	3

February 4, 2019

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
	<b>Problem Gambling Prevention for Youth and Young Adults</b>			
1	The provincial Responsible & Problem Gambling program will link with the University of Victoria's Centre for Addictions Research and other researchers to work towards linking problem gambling education with broader issues of substance use, including preventing and addressing dependence and fostering positive mental health and social and personal responsibility.	GPEB	<ul style="list-style-type: none"> <li>GPEB engaged with CARBC and Education to develop education modules to be in line with the new British Columbia school curriculum.</li> <li>The modules were developed under the iMinds brand and are now available via CARBC and the BC Responsible Gambling Program websites.</li> </ul>	Status: Complete

February 4, 2019

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
2	<p>Within available resources, the provincial Responsible and Problem Gambling Program is shifting its prevention services to incorporate a greater focus on problem solving and critical thinking to ensure programs are as effective as possible for students.</p>	GPEB	<ul style="list-style-type: none"> <li>• In consultation with CARBC, the new modules were created to focus on competency based decision making, not strictly gambling.</li> <li>• In addition to the new modules, the BC RPGP held training workshops for contracted staff to ensure knowledge of the new materials and curriculum. This knowledge is in place to support facilitation and increase effectiveness. Educators can contact the BC RPGP or CARBC for support if and when needed.</li> </ul>	<p>Status: Complete</p>



	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
3	<p>The Ministry of Education will share the findings of the PHO Report on Gambling as well as current research related to youth gambling with the Physical and Health Education curriculum development teams and other relevant specialist associations such as school counsellors.</p>	GPEB	<ul style="list-style-type: none"> <li>GPEB worked with Education and engaged CARBC, commissioning a review of existing prevention and education materials. CARBC provided a report and recommendations for the implementation of gambling related research in to the curriculum.</li> </ul>	<p>Status: Complete</p>

February 4, 2019

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
4	<p>Links to responsible gambling education materials will be added to the new Physical and Health Education curriculum as well as to the Healthy Schools BC website and promoted in the Healthy Schools BC newsletter.</p>	GPEB	<ul style="list-style-type: none"> <li>GamIQ materials posted to Healthy Schools website.</li> <li>iMinds curriculum material posted on BC Responsible Gambling website and at CARBC (Oct. 2017)</li> <li>Educational materials branded under iMinds are to be uploaded to Healthy Schools website by CARBC, who developed the materials and who hold the iMinds account.</li> <li>Upon completion of upload, the RPGP will draft a newsletter article.</li> </ul>	Status: Complete
5	<p>The Ministries of Education, AG and Health will work together to increase awareness about the need for problem gambling education and its links with broader issues of risk-taking behaviour, and promote related education materials.</p>	GPEB	<ul style="list-style-type: none"> <li>Working group was formed and brought about the curriculum described, which focuses on broader issues of addiction. These ministries are consulted as and when required to provide information relevant to curriculum updates.</li> </ul>	Status: Complete

February 4, 2019



Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
<b>Promoting Healthy Choices</b>			
<p>6</p> <p>BCLC is working with other gambling jurisdictions in Canada on constructive approaches to communicating 'odds' and 'return to player' on Electronic Gaming Machine screens to dispel myths about control and ability to win.</p>	BCLC	<ul style="list-style-type: none"> <li>Engaged with the UBC Centre for Gambling Research through a working group focused on conducting a jurisdictional scan of methods for communicating odds.</li> <li>Ontario Lottery and Gaming (OLG) has invested a significant amount into piloting an initiative to classify slot machines. s 13(1)</li> <li>As such, we have decided to proceed with our own plan to fulfill this recommendation.</li> </ul>	<p>Status: Partially Complete</p> <p>Next Steps</p> <p>BCLC is working on providing point-of-play information on the average return to player across all EGMs in the province and directing players to seek a more detailed understanding from knowledgeable GSAs at the local GSICs by Summer 2019. This would entail:</p> <ul style="list-style-type: none"> <li>Providing information, via iView on slot machines, on the average return to player of slot machines in BC in the past year</li> <li>Reinforcing this information through CoolSigns (digital displays in facilities)</li> <li>Directing players to visit local GSICs and their educational activities</li> </ul>

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
7	Beginning in 2015, BCLC will offer new time and money budgeting tools to its Encore Rewards members. Similarly, enhanced tools have been developed for implementation on PlayNow.com.	BCLC	<ul style="list-style-type: none"> <li>PlayPlanner is BCLC's new, optional budgeting tool that allows players to set and manage daily maximums for how much time or money they want to spend playing on a slot machine.</li> <li>s 13(1)</li> <li>PlayPlanner was successfully tested by quality assurance and onsite production validation.</li> <li>BCLC completed technical testing on July 22, 2018, after a three month pilot at two sites in Kamloops. Player usage and feedback was limited due to ongoing labour action.</li> </ul>	Status: Partially Complete  Next Steps <ul style="list-style-type: none"> <li>Provincial rollout of the tool is planned for Spring/Summer 2019.</li> </ul>
8	BCLC has conducted its third review of the Appropriate Response Training (ART) program for gaming facility staff, and will be incorporating new approaches to problem gambling identification and response as recommended by the Responsible Gambling Council (RGC).	BCLC		Status: Complete

February 4, 2019



	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
9	In implementing changes to the Appropriate Response Training program, BCLC will incorporate mandatory staff training about the cognitive effects of alcohol and the resulting increase in impulse behaviour.	BCLC		Status: Complete
10	GPEB and BCLC plan to implement a GameSense Advisor presence in community gaming centres.	GPEB & BCLC	<ul style="list-style-type: none"> <li>Engaged in dialogue with BCLC.</li> <li>Decision note for the Minister responsible was reviewed and approved by MO</li> <li>In December 2017, BCLC and GPEB announced the GameSense Advisors (GSA) will transition to BCLC employee positions beginning April 1, 2018</li> </ul>	<p>Status: Partially Complete</p> <p>This transition has now occurred and BCLC will continue to incrementally add staff to expand the GSA program to all facilities province-wide with completion anticipated by September 2019.</p> <p>Next Steps</p> <ul style="list-style-type: none"> <li>The next wave of hiring will begin in late January, with onboarding scheduled to begin March 26, 2019.</li> </ul>
11	BCLC is implementing a new Appropriate Response Training course that is specific to customer telephone support to assist staff in recognizing and responding to callers who may be exhibiting signs of problem gambling.	BCLC		Status: Complete

12	<p>BCLC will implement customized responsible gambling messaging to PlayNow.com account holders as well as BCLC Encore members.</p>	<p>BCLC</p>	<ul style="list-style-type: none"> <li>In 2014, BCLC partnered with the Manitoba Gambling Research Program, and researchers from UCLA, UNLV, and Southern Cross University to evaluate customized responsible gambling messaging to PlayNow.com account holders as well as Encore members. The field experiment began in fall 2016 and was discontinued due to a low rate of engagement and above average unsubscribe rate.</li> <li>Following consultation with BCLC business units and external researchers, Strategic Science was engaged to conduct a review on how to effectively reach BC gamblers through customized responsible gambling messaging. They presented their findings and recommendations to BCLC executive and key staff on June 29, 2018.</li> <li>A cross-enterprise working group has been established to review the best practices report and identify key</li> </ul>	<p><b>Status: Partially Complete</b></p> <p><b>Next Steps</b></p> <ul style="list-style-type: none"> <li>Research examining the predictive ability of key risk factors to predict indicators of harm will be completed by May 31, 2019.</li> <li>Once risk factors are validated, customized messages will be developed and research conducted to measure the impact of these messages on reducing risk.</li> <li>BCLC has an NDA in place with the company that specializes in artificial intelligence methods, and a SOW is in development.</li> <li>The next step is to share a sample of data to determine the feasibility of this method. To be completed by March 31, 2019.</li> </ul>
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	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
			<p>indicators to apply to historical PlayNow data.</p> <ul style="list-style-type: none"> <li>As well, BCLC is consulting with a company that specializes in Artificial Intelligence to examine opportunities to apply AI methods to identify increased risk using Encore data.</li> </ul>	
13	BCLC will engage an international team of researchers in a longitudinal research project to evaluate the impact of customized messaging on player behaviour.	BCLC		<p><b>Status: Partially Complete</b></p> <p>This research project is pending commitment 12 that will be instructive for research design on this item.</p> <p><b>Next Steps</b></p> <ul style="list-style-type: none"> <li>Once testing has completed, an appropriate implementation strategy will be developed.</li> </ul>

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
14	<p>BCLC has worked with the Responsible Gambling Council in developing and implementing their new Responsible Gambling Check accreditation program for online gaming.</p> <p>In anticipation of being the first online gaming platform to officially participate in this program, BCLC has identified a number of changes in its approach to online responsible gambling, including better documentation of processes, policy reviews, and customer support training.</p>	BCLC		Status: Complete

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	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
15	GPEB will update its Responsible Gambling Standards to include online gambling on PlayNow.com. These standards must be followed by BCLC and all gaming service providers in British Columbia.	GPEB	<ul style="list-style-type: none"> <li>GPEB commissioned Strategic Science, an independent research firm to conduct a review of academic research, international standards for online gaming, and behaviour analytics to make recommendations about how GPEB's Responsible Gambling Standards can better incorporate online gambling. Strategic Science presented initial findings to GPEB on November 16, 2015. Full report was delivered in March 2016.</li> <li>As a result, and using these findings, BCLC and GPEB have engaged in dialogue around the form these standards might take.</li> </ul>	<p>Status: Partially Complete</p> <p>Next Steps</p> <ul style="list-style-type: none"> <li>GPEB is forming a working group to develop new standards</li> </ul>
Problem Gambling Support and Treatment Services				



	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
16	The Ministry of Finance will partner with the Ministry of Health to further explore problematic gambling screening and collaborative care planning for clients with co-occurring issues with the goal of improving the overall continuity of care.	GPEB	<ul style="list-style-type: none"> <li>GPEB has worked with Northern Health and have shared gambling screening tools for their use.</li> <li>GPEB has proposed a collaborative case management approach for further collaboration with provincial health entities.</li> </ul>	Status: Complete
	<b>Responsible and Problem Gambling Policy and Research</b>			
17	The Ministries of Health and Finance, with BCLC, will be responsible for maintaining a working group with stakeholders and the Ministry of Education, to continue a dialogue regarding policy and legislative decisions that involve expansion of gambling in the province, issues related to the public health risks of gambling, and alignment of policies and practices.	GPEB, & Ministries of Health & Education, & BCLC	<ul style="list-style-type: none"> <li>Collaborative work and research led to the municipal information package to inform local governments on the public health risks of gambling.</li> <li>Working group formed to examine social risk factors (ongoing). A Health Impact Assessment model has been implemented.</li> </ul>	Status: Complete

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
18	The provincial government will develop a standardized package of information outlining the public health risks of gambling. It will be offered to municipalities to assist decision makers in their analysis of gaming expansion and ensure that they have a full understanding of the risks and benefits of expanding gambling in their communities. The package will include information about problem gambling prevalence, availability of alcohol, high-risk games, and revenue generated from problem gamblers.	GPEB	<ul style="list-style-type: none"> <li>Working research group with multiple partners (Health, Education, UBC)</li> <li>Document finalized and drafted. <ul style="list-style-type: none"> <li>Includes information about problem gambling prevalence, availability of alcohol, high-risk games, and revenue generated from problem gamblers.</li> </ul> </li> </ul>	<p><b>Status: Complete</b></p> <ul style="list-style-type: none"> <li>Document is finalized – is currently in desktop publishing</li> </ul> <p><b>Next Steps</b></p> <ul style="list-style-type: none"> <li>Document will need to be distributed</li> </ul>
19	Government and BCLC will consider long-term funding of the Centre for Gambling Research at the University of British Columbia in fall 2017.	GPEB & BCLC	<ul style="list-style-type: none"> <li>GPEB/BCLC funding provided to the UBC centre as of 14/15.</li> <li>Decision note on funding beyond the 2017/18 fiscal year has been approved for funding support for a five year term.</li> </ul>	<p><b>Status: Complete</b></p> <p>UBC Research Centre funded to 2022/23.</p>



Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
<p>GPEB and BCLC will undertake research to determine the impacts of reducing or minimizing higher risk features of Electronic Gaming Machines.</p>	<p>GPEB &amp; BCLC</p>	<ul style="list-style-type: none"> <li>Engaging with UBC and BCLC on research methodologies.</li> <li>UBC, with GPEB support, is currently involved in a phase of associated research on this topic.</li> <li>BCLC and GPEB have engaged Gambling Research Exchange Ontario (GREO) to undertake a review to examine the impacts of reducing or minimizing higher risk features of Electronic Gaming Machines. Funding is from the withheld jackpot fund.</li> </ul>	<p><b>Status: In progress</b></p> <p>BCLC and GPEB provided feedback to GREO on the draft report.</p> <ul style="list-style-type: none"> <li>Expert consultation is underway and the final report is expected in early 2019.</li> </ul>

	Commitment	Lead / Support	Actions Taken	Status Update and Next Steps
21	<p>GPEB and BCLC will undertake research to estimate online gambling prevalence and problem gambling prevalence among online players in British Columbia.</p>	<p>GPEB &amp; BCLC</p>	<ul style="list-style-type: none"> <li>Online Gambling Prevalence study planned for 2018.</li> <li>The UBC Centre for Gambling Research completed a study that characterized level of play (Pareto analyses) on the PlayNow platform in one month.</li> <li>BCLC and GPEB plan to expand the investigation to examine gambling and problem gambling characteristics using both survey and player data.</li> </ul>	<p><b>Status: In Progress</b></p> <p><b>Next Steps</b></p> <ul style="list-style-type: none"> <li>GPEB posted an RFP to BC Bid for a contractor to conduct the prevalence study for online problem gambling. The RFP closed December 18, 2018.</li> <li>Research will be funded from the withheld jackpot fund.</li> <li>BCLC and GPEB completed scoring of the two proposals on January 12, 2019 and a proponent to conduct the research selected.</li> </ul>