

Kevin Simcoe

Subject:
Location: s 16

Start:
End:
Show Time As: Tentative

Recurrence: (none)

Meeting Status:

Organizer:

Hi – please plan to be there.

-----Original Appointment-----

From: Kandice.Nagel@gov.bc.ca [<mailto:Kandice.Nagel@gov.bc.ca>] **On Behalf Of** Meilleur, Len FIN:EX

Sent: August-29-16 3:54 PM

To: Meilleur, Len FIN:EX; Mazure, John C FIN:EX; Wenezenki-Yolland, Cheryl FIN:EX; 'Flore, Cara'; 'kevin.hackett@cfseu.bc.ca'; Paul Dadwal; Steenvoorden, Tom PSSG:EX; Amanda Hobson; Rob Kroeker; Jaggi-Smith, Michele FIN:EX; DeMott, Rachel FIN:EX; Ackles, Ken FIN:EX; Boychuk, Dave FIN:EX; Jim Lightbody

Subject: JIGIT Presentation at Green Timbers offices - Surrey

When: October-14-16 1:00 PM-2:30 PM (UTC-08:00) Pacific Time (US & Canada).

Where: s 16

There has been a scheduling conflict so the meeting has been moved to October. Hope all will be available to attend.

Thanx, Kandice

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Works perfectly. I have copied Nicole and will ask her to block off 11:00 a.m. to 1:30 p.m. that day in my calendar.

From: Ross Alderson
Sent: September-06-16 12:36 PM
To: Rob Kroeker
Subject: RE: Date for ACAMS speaking engagement

Does Nov 24 work for the ACAMS speaking engagement

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Tuesday, September 06, 2016 11:21 AM
To: Ross Alderson
Subject: RE: Date for ACAMS speaking engagement

Yes for sure. Not sure why you were not included. I will forward meeting invite to you.

From: Ross Alderson
Sent: September-06-16 11:16 AM
To: Rob Kroeker
Subject: RE: Date for ACAMS speaking engagement

I will let the board know and get back to you on dates.
I don't have anything down for JIGIT on that day. Should I put in a place holder?

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Tuesday, September 06, 2016 11:14 AM
To: Ross Alderson
Subject: RE: Date for ACAMS speaking engagement

Hi – I see a 30 min place holder in my calendar. However, we also have a key JIGIT meeting that day for 1:00 p.m. Can we move the lunch and learn to last two weeks of Nov or early Dec

From: Ross Alderson
Sent: September-06-16 11:09 AM
To: Rob Kroeker
Subject: Date for ACAMS speaking engagement

Rob,
Apparently the date booked for you to speak at the ACAMS lunch and Learn was Friday Oct 14.
Is usually from 12-1PM
Does that work?

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Not sure why we would report the project status on this GPEB? I am not aware of us doing so in the past.

The FOI request has just come to me for review. Has your team been over it in close detail to make sure we are not disclosing any capabilities?

From: Ross Alderson
Sent: September-06-16 3:34 PM
To: Rob Kroeker
Subject: RE: FOI 16-032_BCLC SAS AML software_draft_6 Sept 2016RA edits (2)

There is a FOI package pending for VP approval on the SAS project. As soon as that FOI package goes out Comms were aiming to send this info note to Govt.

There was a question around if GPEB knew about the potential delay with the project. I told Angela I was not sure on that as I knew you had a meeting scheduled with SAS either today or soon to talk about project status

Ross Alderson CAMS.

Director, AML & Investigations
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•Yes, and...•

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Tuesday, September 06, 2016 3:15 PM
To: Ross Alderson
Subject: RE: FOI 16-032_BCLC SAS AML software_draft_6 Sept 2016RA edits (2)

Who is this for and when are they asking to have it?

From: Ross Alderson
Sent: September-06-16 3:10 PM
To: Rob Kroeker
Subject: RE: FOI 16-032_BCLC SAS AML software_draft_6 Sept 2016RA edits (2)

Rob, With document attached

Ross Alderson CAMS.

Director, AML & Investigations
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•Yes, and...•

ralderson@bclc.com

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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.

From: Ross Alderson
Sent: Tuesday, September 06, 2016 3:09 PM
To: Sarah Morris; Laura Piva-Babcock
Cc: Angela Koulyras; Rob Kroeker
Subject: RE: FOI 16-032_BCLC SAS AML software_draft_6 Sept 2016RA edits (2)

Hi, give me 20 minutes, in a meeting
Rob is aware but I can't speak to Jim or GPEB.

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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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.

From: Sarah Morris
Sent: Tuesday, September 06, 2016 2:25 PM
To: Laura Piva-Babcock; Ross Alderson
Cc: Angela Koulyras
Subject: FOI 16-032_BCLC SAS AML software_draft_6 Sept 2016RA edits (2)

With my own comments in response, Laura...Ross, is GPEB up to speed on this project and timeline?

Kevin Simcoe

From:
Sent:
To:
Subject:

Good work on this Ross. Thanks.

From: Ross Alderson
Sent: September-12-16 10:18 AM
To: Rob Kroeker
Cc: Kevin Sweeney; Brad Desmarais; Jennifer Keim
Subject: RE: Follow up needed

Hi Rob,

This matter has been dealt with.

In summary:

s 15(1), s 22

FINDINGS

s 15(1), s 22

Let me know if you require further

Ross Alderson CAMS.

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•Yes, and...•

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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.

From: Rob Kroeker
Sent: Wednesday, August 31, 2016 7:11 AM
To: Ross Alderson
Cc: Kevin Sweeney; Nicole Wu; Brad Desmarais
Subject: Follow up needed
Importance: High

Good morning Ross

s 15(1), s 22

As to timing, if we can try to make inquiries over the next couple of weeks that would be appreciated.

Thanks,

Rob

From: Nicole Wu
Sent: August-30-16 4:04 PM
To: Rob Kroeker
Subject: Urgent & Confidential
Importance: High

Rob,
Jim has received the attached mail from a complainant s 15(1), s 22 dated August 23, 2016 and he would like you to review it and let him know your opinion.

Thanks,
Nicole

Nicole Wu
Executive Assistant

Corporate Security & Compliance

2940 Virtual Way, Vancouver BC V5M 0A6

T 604 228 3103 F 604 225 6488

• **Yes, and...** •

Kevin Simcoe

From:
Sent:
To:
Subject:
Attachments:

Just for your info at this point. I have only had a chance to look at very quickly. Some changes made it but looks like not many.

From: Jim D. Lightbody
Sent: September-14-16 3:39 PM
To: Rob Kroeker; Brad Desmarais; Susan Dolinski
Subject: Fw: Final MNP report

FYI. I haven't read yet, but let's discuss later.

Sent from my s 15(1)(l)

From: Fitzgerald, Anna FIN:EX <Anna.Fitzgerald@gov.bc.ca>
Sent: Wednesday, September 14, 2016 3:31 PM
To: Jim D. Lightbody
Cc: Mazure, John C FIN:EX
Subject: Final MNP report

Hello Jim,
I trust you are well.
I am attaching a copy of the final MNP report on John's behalf.
Please do not hesitate to let me know if you need anything further.
Regards,
Anna

Anna Fitzgerald CPA, CA, CIA
Senior Regional Director, Lower Mainland
Compliance Division
Gaming Policy and Enforcement Branch
604-660-0274
Know your limit, play within it.

If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.

Kevin Simcoe

From:
Sent:
To:
Subject:

Hi

No that letter has not gone and we should not get front of it with any communications. I understand you desire to get further clarity but we are going to have to be patient and let things play out further at the top end before we start communicating on this.

R

From: Ross Alderson
Sent: September-14-16 11:36 AM
To: Rob Kroeker
Subject: July 19 GCA Authorities

Hi Rob,
I know you mentioned Jim may follow up with a letter to John MAZURE regarding the presentation JM provided.
Do you know if that was ever done?
Reason I ask is, after the meeting with Anna the other day there is clearly still some miscommunication on just what GPEB's role is in relation to conducting Compliance audits and overall reporting.
The managers here are probably still a little in the dark as well as they are not privy to that presentation.
I would like to share the presentation with the BCLC Investigations and Compliance management team say prior to the next monthly BCLC/GPEB Compliance meeting so that the right questions can be asked.
I think now is a good time to clarify GPEB's audit access and everyone's expectations.
Regards

Ross Alderson CAMS.

Director, AML & Investigations
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•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Good. Have you talked to Anna about this. Maybe she can help with getting them to a better understanding of the issues in using \$ amounts.

From: Ross Alderson
Sent: September-16-16 2:52 PM
To: Ross Alderson; Laura Piva-Babcock; Angela Koulyras; Sarah Morris
Cc: Rob Kroeker; Kevin Sweeney; Jennifer Keim
Subject: Re: Str figures

Len is out of office so I forwarded to MAZURE

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Friday, September 16, 2016 2:49 PM
To: Laura Piva-Babcock; Angela Koulyras; Sarah Morris
Cc: Rob Kroeker; Kevin Sweeney; Jennifer Keim
Subject: Fw: Str figures

Fyi

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Ross Alderson <RAlderson@BCLC.com>
Sent: Friday, September 16, 2016 2:48 PM
To: Len Meilleur - BC Public Service
Subject: Str figures

Hi Len,
I spoke to Bob Stewart this afternoon. He indicated Govt wants to release UFT \$ figures for 2015 and 2016 to indicate the downward trend.

I would caution against using these figures particularly for 2016 as 20-25% of all UFT files are generally unsubstantiated. This could include a buy in from a previous casino win or an ATM withdrawal. There was also a spike in December and January due to the RRCCR under reporting issue so without context that could be misinterpreted

It would take a day next week for BCLC to provide you the accurate figures of exactly what was reported to FINTRAC. However GPEB already have that information as they get a copy of all str reports

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

Kevin Simcoe

From:
Sent:
To:
Subject:

Ross

Thanks for the input. We continue to push to find a path to success.

Rob

From: Ross Alderson
Sent: September-22-16 3:59 PM
To: Rob Kroeker
Subject: SAS AML meeting

Rob

I will miss the SAS meeting tomorrow afternoon however I met with Ranj today so he could give me an update.

s 17(1)

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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Kevin Simcoe

From:
Sent:
To:
Subject:

Is that a first draft on both notes or just one?

Sure send me what you have for now. Thanks.

From: Ross Alderson
Sent: September-23-16 9:26 AM
To: Rob Kroeker
Subject: Re: Travel Budgets FY18

s 22 I sent the first draft of the BN to Laura yesterday for her input. Was going to get her to add/ edit then send to you. I can send you what I have now if you want?

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Friday, September 23, 2016 9:22 AM
To: Ross Alderson
Subject: RE: Travel Budgets FY18

s 22

Was asking because I was wondering how the BN on the MNP audit and GPEB authorities are coming?

From: Ross Alderson
Sent: September-23-16 9:19 AM
To: Rob Kroeker
Subject: Re: Travel Budgets FY18

No,
s 22

Langley this afternoon to meet with Daryl.

then heading out to

s 22

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Friday, September 23, 2016 9:07 AM

To: Ross Alderson
Subject: RE: Travel Budgets FY18

Thanks – are you in the office today?

From: Ross Alderson
Sent: September-23-16 8:53 AM
To: Rob Kroeker; Nicole Wu; Kevin Sweeney; Jennifer Keim; Jennifer R. Barbosa
Cc: Mike Hays
Subject: Re: Travel Budgets FY18

Copy that Rob. We will make the necessary changes as per Executive direction.
Kris has already notified Mike. I believe the spreadsheets are locked.
Regards

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Friday, September 23, 2016 7:51 AM
To: Nicole Wu; Kevin Sweeney; Jennifer Keim; Jennifer R. Barbosa; Ross Alderson
Cc: Mike Hays
Subject: Travel Budgets FY18

Good morning everyone

Yesterday and the day before the executive team met to review the budget submissions for FY18 and the five year forecast we must provide to government. Overall requests for travel increased for FY18 by \$600,000 or ~ 21%. The rationales supporting the increases were reviewed. Despite the reasons provided for this increase, there are clear signals from government that Crowns will be expected to have tight controls on travel expenses. It would simply not meet the direction that has been signaled from government and the direction we expect to receive to propose a travel cost increase of this magnitude. Accordingly, the executive team took the decision to have FY18 travel budgets held flat to FY17 budgets by division. Travel budgets between cost centers within the division can be reallocated as necessary but the travel costs by division will need to be flat to FY17 budget. **Adjustments required to reflect this direction must be made by October 4th** (at the cost center level). Please work with Mike Hays to have necessary changes in your budgets in place by this date.

All Directors must work together to ensure overall divisional travel budgets submitted are flat to FY17 (or if increasing, must show the corresponding decrease in another cost center). If you have any questions, please contact myself or Mike Hayes. The management team across the company will need to work to find efficiencies (e.g. increasing car vs. air travel between offices) to hold FY18 travel flat. There are plans to provide an additional fleet vehicle and we encourage virtual meetings as much as possible with the tools and technology available. In FY18 I will be challenging us as a team to manage travel closely so that we meet the objective of being flat on travel while still meeting our business needs. We will discuss strategies to help us achieve this objective at our next managers meeting.

Please feel free to share this note with your managers.

Thank you in advance for your cooperation.

Rob Kroeker
Vice President | Corporate Security & Compliance
British Columbia Lottery Corporation

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks.

From: Ross Alderson
Sent: September-23-16 9:30 AM
To: Rob Kroeker
Subject: Fw: Minister Meeting topics

Here you go. I combined both onto one note and was going to defer to Laura for the appropriate format. As per my note to Laura. Haven't heard back from her yet

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Ross Alderson <RAlderson@BCLC.com>
Sent: Thursday, September 22, 2016 2:18 PM
To: Laura Piva-Babcock
Subject: RE: Minister Meeting topics

Hi Laura,
Here is my first stab. It's pretty long but I thought I would start with too much detail and we can cut back rather than other way around

I can't seem to find the final draft of the roles and Responsibilities document so if you can send that to me that would be awesome

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Wednesday, September 21, 2016 7:38 AM
To: Ross Alderson
Cc: Laura Piva-Babcock
Subject: FW: Minister Meeting topics

Hi Ross – on #4 please find attached a s 14

I will work with you and Laura
once you have rough first draft. Will touch base with you this morning when you are in the office.

s 14

Thanks,

R

From: Rob Kroeker
Sent: September-21-16 7:29 AM
To: Susan Dolinski; Ross Alderson
Cc: Nicole Wu
Subject: FW: Minister Meeting topics

Good morning Susan

Would you please advise who from your shop will be leading working on items # 1 and #4. I have copied Ross in on this and will ask him to lead from our end on getting first drafts of items #2 and #4 written up. I will work with Ross as well.

Thanks,

Rob

From: Jim D. Lightbody
Sent: September-19-16 3:21 PM
To: Susan Dolinski
Cc: Amanda Hobson; Rob Kroeker; Brad Desmarais; Suzanne Rowley
Subject: FW: Minister Meeting topics

Susan et al;

Can you please coordinate the briefing materials we'll need for our upcoming (Oct 13) meeting with the Minister (Bud and I will represent BCLC). Various people will provide materials and here's the list of topics. We can agree on our priority or order later when Bud is back.

1. Treasury Board Submission – Amanda
2. MNP report/AML progress – Rob
3. SP Commission and OSA – Brad
4. GPEB and BCLC roles/authority – Rob
5. 16/17 Mandate Letter priorities – Susan
6. Kamloops Facility Update – Amanda
7. Slot machine definition - Brad

See below for context.

We should look to having this completed by **October 7th** so we can review and perhaps send something in advance to the Minister for review beforehand.

Thanks everyone,
Jim

From: Wenezenki-Yolland, Cheryl FIN:EX [<mailto:Cheryl.WenezenkiYolland@gov.bc.ca>]
Sent: Monday, September 19, 2016 3:07 PM
To: Jim D. Lightbody
Cc: Mazure, John C FIN:EX; Klak, Steve M FIN:EX
Subject: RE: Minister Meeting topics

Hi Jim,

I would agree with all the items you have identified

The only items that I would add based on our discussions previously with the Minister would be:

s 12, s 13(1)

Thanks Jim.

Cheryl

From: Jim D. Lightbody [<mailto:JDLightbody@bclc.com>]
Sent: Monday, September 19, 2016 2:09 PM
To: Wenezenki-Yolland, Cheryl FIN:EX
Cc: Mazure, John C FIN:EX
Subject: Minister Meeting topics

Cheryl;

Here are some suggestions for topics to discuss with our Minister on October 13th:

1. Treasury Board Submission
2. MNP report
3. Service Provider Commission and Operating Service Agreement
4. GPEB and BCLC roles, responsibilities and authority

The last topic is one that we have been discussing at our Joint Executive meetings. It would be good for the Minister to understand how the GCA differentiates our roles and the role of GPEB as it pertains to BCLC (versus Charitable Gaming for instance).

Let me know if there are any other topics you or John would like to add.
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
bclc.com

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Kevin Simcoe

From:
Sent:
To:
Subject:

Hi Ross. Hope this is helpful.

s 13(1), s 14

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Friday, September 30, 2016 10:29 AM
To: Rob Kroeker
Subject: RE: Information Note

Lol...Its ok. I read it s 22

I made some comments as well but you have captured everything I had in my edits and then some.

I am reading through now

Ross Alderson CAMS.

Director, AML & Investigations

Corporate Security and Compliance Division, BCLC

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•Yes, and...•

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Friday, September 30, 2016 9:45 AM
To: Ross Alderson
Subject: FW: Information Note
Importance: High

Hi
Try not to get too excited about this.
Can you take a look as well – especially at numbers they are using around STR \$ amounts.
Rob

From: Rob Kroeker
Sent: September-30-16 8:51 AM
To: Amanda Hobson; Susan Dolinski; Laura Piva-Babcock
Subject: RE: Information Note
Importance: High
s 13(1)

Rob

From: Rob Kroeker
Sent: September-30-16 8:14 AM
To: Amanda Hobson; Susan Dolinski; Laura Piva-Babcock
Subject: Fw: Information Note

Amanda
s 13(1)

Your thoughts?
Sent from my s 15(1)(l)

From: Jaggi-Smith, Michele FIN:EX <Michele.JaggiSmith@gov.bc.ca>
Sent: Thursday, September 29, 2016 2:38 PM
To: Amanda Hobson; Rob Kroeker; Swan, Angela FIN:EX
Cc: Hazel, Jillian FIN:EX; Henderson, Jeff FIN:EX
Subject: Information Note

Hi,
Please find attached a draft MNP AML Information note for the Minister for your review and comments. Thanks.
Michele

Michele Jaggi-Smith | Executive Director

Strategic Policy and Projects Division

Gaming, Policy and Enforcement Branch

Direct: 250.356.1109 | Fax: 250.356.1910 | Email: michele.jaggismith@gov.bc.ca

Kevin Simcoe

From:
Sent:
To:
Subject:

What are they after?

From: Ross Alderson
Sent: September-30-16 4:24 PM
To: Rob Kroeker
Cc: Kevin Sweeney
Subject: RE: FYI - Project Sienna

I just off an hour long phone call with Anna.
I am hopeful we can move forward constructively.

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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From: Rob Kroeker
Sent: Friday, September 30, 2016 4:00 PM
To: Ross Alderson
Cc: Kevin Sweeney
Subject: Re: FYI - Project Sienna

Thanks Ross

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Friday, September 30, 2016 12:03 PM
To: Rob Kroeker
Cc: Kevin Sweeney
Subject: FYI - Project Sienna

Rob,
I am told Rob BARBER from GPEB is asking questions of our staff around project sienna specifically the process s 15(1)

There were a number of cases where BCLC and the SP worked together s 15(1)

I will talk to Anna today to see if there is a specific project underway but I wanted to give you a heads up in case something arises.

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Ok Look forward to the meeting. Need to understand exactly which new requirement Equifax will be covering off.

From: Ross Alderson
Sent: October-06-16 12:42 PM
To: Rob Kroeker
Subject: Re: Google Alert - anti-money laundering

Good question. s 15(1)

and we will certainly
cover that off in the meeting later this month. I have had a few chats with eGaming ops

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Thursday, October 6, 2016 12:18 PM
To: Ross Alderson
Subject: RE: Google Alert - anti-money laundering

Compliant with which aspect?

From: Ross Alderson
Sent: October-06-16 11:45 AM
To: Rob Kroeker
Subject: RE: Google Alert - anti-money laundering

Heard from eGaming.

They are aware. Isn't a new product per se, but rather a new set of codes that has been added to the EID suite that BCLC already use. The new codes will drop s 15(1) at the end of November and there will changes thereafter to ensure we are compliant by June 2017.

Ross Alderson CAMS.

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•Yes, and...•

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Thursday, October 06, 2016 7:14 AM
To: Ross Alderson; Bal Bamra
Subject: Fw: Google Alert - anti-money laundering

See the Equifax article. They might have a new ID tool

Sent from my s 15(1)(l)

From: Google Alerts <googlealerts-noreply@google.com>
Sent: Thursday, October 6, 2016 7:05 AM
To: Rob Kroeker
Subject: Google Alert - anti-money laundering



anti-money laundering

Daily update · October 6, 2016

NEWS

Presuming the Basics: New York's Anti-Money Laundering Rule

Bloomberg BNA

This article focuses on New York's recently adopted Rule 504 requiring banks to demonstrate that their anti-money laundering transaction monitoring ...



Flag as irrelevant

Equifax Canada Announces New Anti-Money Laundering Capabilities to Improve Compliance and ...

Marketwired (press release)

Equifax Canada, a leading provider of anti-money laundering (AML) compliance solutions, today announced its new capabilities designed to assist ...

[Ottawa will attempt to close Fintracs lawyer loophole](#) - Vancouver Sun

Full Coverage



Flag as irrelevant

PWD director claims trial to money laundering charges

The Star Online

Khalid, 56, was charged with money laundering activities by having RM1,984,797 ... He was accused of Section 4(1)(b) of the Anti-Money Laundering, ...



Flag as irrelevant

Malacca PWD director hit with two more money laundering charges

Malay Mail Online

His first charge today was under Section 4(1)(b) of the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ...

[Malacca state works department director charged with money laundering](#) - The Sun Daily

[Melaka PWD director faces two more money laundering charges, involving RM4.1m](#) - Astro Awani

Full Coverage



Flag as irrelevant

[Corruption Currents: Yahoo Used Spam Filter to Comply With Search Order](#)

Wall Street Journal (blog)

South Korean industries are figuring out how to comply with new anti-graft laws. ... A regional body agreed to help Nigeria fight money laundering and ...



Flag as irrelevant

[Swiss private bank Falcon says not for sale](#)

Reuters

The inspection was part of Singapore's money laundering probe linked to Malaysian state fund 1Malaysia Development Bhd (1MDB), under which the ...



Flag as irrelevant

[cash 'from unknown sources'](#)

The Press

It appeared Robinson was "structuring" his deposits to avoid the banks' requirements under anti-money laundering measures, to report suspicious ...



Flag as irrelevant

[OCC Issues Guidance on AML/BSA Risk Management](#)

ABA Banking Journal (blog)

The guidance addresses the recent "derisking" trend in anti-money laundering and Bank Secrecy Act compliance. The guidance directs banks to ...



Flag as irrelevant

[CCAB urges government to strengthen AML regime](#)

CCH Daily Inc Accountancy Live (subscription) (blog)

CCAB, the collective of five accountancy bodies - ICAEW, ACCA, CIPFA, ICAS and Chartered Accountants Ireland, has published its first Manifesto for ...



Flag as irrelevant

[Galdes appointed as partner of ARQ Group](#)

Times of Malta

Dr Galdes will also be joining the law firm as a partner, heading the law firm's compliance and AML practice. Dr Galdes has been involved in the ...



Flag as irrelevant

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Kevin Simcoe

From:
Sent:
To:
Subject:

I will ask him if we can see it or a portion of it.

From: Ross Alderson
Sent: October-06-16 2:13 PM
To: Rob Kroeker
Cc: Bal Bamra; Daryl Tottenham
Subject: RE: OLG / BCLC Meeting

Looks good to me.

7e hopefully includes the AML SP training video that they have as I would like to see that. Shauna mentioned yesterday she had seen it.

I will sit down with Bal and Daryl early next week to view our presentation (7c and d)

Regards

Ross Alderson CAMS.

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•Yes, and...•

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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.

From: Rob Kroeker
Sent: Thursday, October 06, 2016 1:48 PM
To: Ross Alderson; Bal Bamra; Daryl Tottenham
Subject: FW: OLG / BCLC Meeting

Take a look at the agenda and let me know what you think

From: Michael Petrocco [<mailto:mpetrocco@olg.ca>]
Sent: October-06-16 10:24 AM
To: Rob Kroeker
Subject: OLG / BCLC Meeting

Rob
I put together a draft agenda for our meeting on October 20th. I attach a soft copy to this email. Feel free to edit items on the

agenda or add others. Once we finalize I will distribute a clean version.
Looking forward to the meeting.
Michael



Michael J. Petrocco

VP, Corporate Compliance

Bus Phone: 416-224-4901

Mobile: S 22

Email: mpetrocco@olg.ca

4120 Yonge St. Suite 500, Toronto, ON M2P 2B8

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Friday, October 7, 2016 9:23 AM
To: Rob Kroeker
Subject: RE: Thank you for your nomination for AML Professional of the Month

Yep, I will follow up with Comms
Ross Alderson CAMS.
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•Yes, and...•

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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.

From: Rob Kroeker
Sent: Friday, October 07, 2016 8:36 AM
To: Ross Alderson; Bal Bamra
Subject: Re: Thank you for your nomination for AML Professional of the Month
Great. Will you and Bal speak to communications?
Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Friday, October 7, 2016 8:16 AM
To: Bal Bamra; Rob Kroeker
Subject: Re: Thank you for your nomination for AML Professional of the Month
Spoke to Daryl, he is good with recognition including a yak article .
Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Bal Bamra
Sent: Wednesday, October 5, 2016 3:42 PM
To: Ross Alderson
Subject: Re: Thank you for your nomination for AML Professional of the Month
We just submitted the picture so it should be out soon. Will send it along when I get it.
Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Wednesday, October 5, 2016 2:58 PM
To: Rob Kroeker; Bal Bamra
Subject: RE: Thank you for your nomination for AML Professional of the Month

I can talk to him tomorrow.

Bal I am on the website and can't see the link to monthly winners only where to nominate. Can you send me a snapshot or link to the page.

Thx

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●Yes, and...●

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Wednesday, October 05, 2016 2:51 PM
To: Bal Bamra
Cc: Ross Alderson
Subject: RE: Thank you for your nomination for AML Professional of the Month
Hi – if Daryl is comfortable with it, we need to get this to communications so we can announce this internally. Its great news.

From: Bal Bamra
Sent: October-05-16 10:51 AM
To: 'Karla Monterrosa (Miami)'
Cc: Ross Alderson; Rob Kroeker
Subject: RE: Thank you for your nomination for AML Professional of the Month
Thank you Karla! That's great news ☺

Bal Bamra B.Com, CAMS
Manager, AML Intelligence
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C's 17(1)

●Yes, and...●

bbamra@bcl.com

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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.

From: Karla Monterrosa (Miami) [<mailto:KMonterrosa@acams.org>]

Sent: Wednesday, October 05, 2016 10:11 AM

To: Bal Bamra

Subject: Thank you for your nomination for AML Professional of the Month

Hi Bal,

Thank you for your nomination. Daryl Tottenham has been selected as the *ACAMS AML Professional of the Month* for October. Please look for the *ACAMS AML Professional of the Month* on ACAMSToday.org and ACAMS.org.

Thank you again!

Kind regards,

Karla Monterrosa-Yancey, CAMS, MBA

Editor-in-Chief

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www.acamstoday.org

www.moneylaundering.com

Follow us on Twitter! [@acams_aml](https://twitter.com/acams_aml)

Kevin Simcoe

From:
Sent:
To:
Subject:

Just saw this – ignore my last note on this.

From: Ross Alderson
Sent: October-07-16 11:53 AM
To: Rob Kroeker
Subject: RE: JIGIT Meeting Next Friday

Yes I am available. I have already spoken to Paul. I think it makes sense that I am there

Ross Alderson CAMS.

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•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Friday, October 07, 2016 10:10 AM
To: Ross Alderson
Subject: JIGIT Meeting Next Friday

Hi

There is an executive briefing on JIGIT set for next Friday. We just got the agenda. Looks more operationally focussed. Are you available 1 – 2:30 to attend with Jim, Amanda and I?

R

Kevin Simcoe

From:
Sent:
To:
Subject:

I saw this in another publication which suggested this was a money laundering event in which LVS participated and speculated given their recent large fine there could be a response from FinCEN

From: Ross Alderson
Sent: October-07-16 9:44 AM
To: AML; Rob Kroeker; Kevin Sweeney; Bal Bamra; Daryl Tottenham; Kris Gade
Subject: FW: Casino's attempt to collect debt exposes world of Chinese high rollers

An interesting read.

Ross Alderson CAMS.

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•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks.

s 14

From: Ross Alderson
Sent: October-07-16 2:02 PM
To: Rob Kroeker
Subject: RE: meeting with GPEB this morning

s 22

GPEB are apparently doing a PIA on info sharing processes and we agreed that both organizations should be involved and Kevin will have team in the process. Anna and Ken were there and were very reasonable and I am optimistic that we can reach a common goal. They get it although there were some outstanding items. s 14

Brandi took notes and I will prepare a summary for you.

Ross Alderson CAMS.

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•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Friday, October 07, 2016 1:56 PM
To: Ross Alderson
Subject: RE: meeting with GPEB this morning

I haven't heard much, just there might be a minister shuffle.

What was Bob's reaction to our response on his STR comment?

Did you get my note about attending the JIGIT meeting next Friday?

From: Ross Alderson
Sent: October-07-16 12:26 PM
To: Rob Kroeker
Subject: meeting wth GPEB this morning

Anna mentioned this morning that there may be possible changes in the Ministers office this weekend? You heard anything like that?

As for the meeting, amicable for most part and a good starting point. There were some interesting statements made by GPEB.
s 22 We challenged
him on that

Ross Alderson CAMS.

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•Yes, and...•

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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.

Kevin Simcoe

From:

Sent:

To:

Subject: Jigit

You will be added to the attendees for next week's meeting.

Kevin Simcoe

From:
Sent:
To:
Subject:

Hi Ross –

Would you please set up a brief call for you, I, Pat, Bill and Mike H to discuss before we start gathering signatures on this.

Thanks,

Rob

From: Ross Alderson
Sent: October-11-16 12:49 PM
To: Rob Kroeker
Subject: FW: Project Variance Form- SAS

Rob, before I approve I wanted to first check in with you as am aware that you may have had further discussion with SAS senior management.

I also checked with Mike HAYES see what the estimated forecast was at the 5+7 and at that time it was expected to be over by \$250K. So we had earmarked an additional \$250K of capital dollars this fiscal year. If this request is approved for \$363K then we will effectively increase the forecast by \$113K.

Let me know how you would like to proceed.

Ross Alderson CAMS.

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•Yes, and...•

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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.

From: Bal Bamra
Sent: Tuesday, October 04, 2016 1:14 PM
To: Ross Alderson
Cc: Bal Bamra
Subject: Project Variance Form

Hi Ross,

Please review the attached project variance form for capital costs around SAS. While the dates are still to be confirmed, Ranj needs to execute a project variance to allocate additional capital if they are going to keep going until then.

The budget is attached in the second tab.

Thanks,

Bal Bamra B.Com, CAMS
Manager, AML Intelligence
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•Yes, and...•

bbamra@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:

Thanks Ross, I knew you guys would be on top of it.

From: Ross Alderson
Sent: October-12-16 8:59 AM
To: Rob Kroeker
Cc: Bal Bamra; Daryl Tottenham; Nicole Wu
Subject: RE: BCLC Proposed Agenda for October 20th, 2016 Session at Ajax

No problem Rob.
We already had slides with the gaming structure in BC – BCLC, GPEB, JIGIT and SP's.
We will add a slide describing CSC's role and I can speak to Compliance processes

Ross Alderson CAMS.

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•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Wednesday, October 12, 2016 8:48 AM
To: Ross Alderson
Cc: Bal Bamra; Daryl Tottenham; Nicole Wu
Subject: FW: BCLC Proposed Agenda for October 20th, 2016 Session at Ajax

Hi all

See the agenda for next week's meeting. While our initial focus was on money laundering you will see there is some reference to compliance more generally. May I please ask you to ensure that we provide an overview of our SP monitoring/audit program generally and not just in terms of AML. I recognize this will require one of you to speak to operations in Kevin and Laird's areas but I am sure you are sufficiently familiar with the subject matter to do so.

Additionally, if you have not already done so, may I please impose upon you to draft up 3-4 intro slides for me to speak to and that give an overall picture of CS&C and our roles and responsibilities. Can be quite high level starting with the structure in BC – BCLC, GPEB and now also JIGIT.

Thanks,

R

From: Michael Petrocco [<mailto:mpetrocco@olg.ca>]
Sent: October-12-16 6:56 AM
To: Rob Kroeker
Subject: Fw: BCLC Proposed Agenda for October 20th, 2016 Session at Ajax

Rob
I made the additions to the agenda that you suggested. I attach a revised version. If you are OK with it we will attach it to the meeting invite so that everyone has it. Thanks



Michael J. Petrocco

VP, Corporate Compliance
Bus Phone: 416-224-4901
Mobiles 22
Email: mpetrocco@olg.ca
4120 Yonge St. Suite 500, Toronto, ON M2P 2B8
----- Forwarded by Michael Petrocco/OLC on 12-10-2016 09:42 AM -----

From: Nancy Spinks/OLC
To: Michael Petrocco/OLC@OLC
Date: 12-10-2016 09:37 AM
Subject: BCLC Proposed Agenda for October 20th, 2016 Session at Ajax

FYI per your request.

Nanc



Nancy Spinks

Executive Assistant to the
Vice President, Corporate Compliance, OLG
Phone: 416-224-4929
Fax: 416-224-7070
Email: NSpinks@OLG.CA

Please update your address book: OLG has recently changed its email domain name from @olg.ca to @olg.ca.
Veuillez mettre à jour votre carnet d'adresses : OLG a récemment remplacé le nom du domaine de son adresse de courriel @olg.ca par @olg.ca.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks. Looks like it was a tough discussion.

From: Ross Alderson
Sent: October-12-16 9:21 AM
To: Rob Kroeker
Subject: Meeting minutes for information sharing

As discussed. Here are the summarized minutes from Friday's meeting.
If you have any questions I am happy to clarify
Regards

Ross Alderson CAMS.

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Kevin Simcoe

From:
Sent:
To:
Subject:

I think you have laid it out well

From: Ross Alderson
Sent: October-14-16 11:13 AM
To: Daryl Tottenham; Bal Bamra; Rob Kroeker
Subject: International EFT's to BC casinos

This is what I intend to send to FINTRAC. Appreciate any feedback before I do so. I did leave a voice message this morning as well and I want to ensure I have captured our concerns fully

Good morning gentlemen,

s 15(1)

s 15(1)

If there is another preferred method for BCLC to make this request please let me know and I will do so.

Respectfully

Ross ALDERSON

GUIDE 8A <http://www.fintrac.gc.ca/publications/guide/Guide8A/nseft-eng.asp#s3-4>

3.4 All other reportable electronic funds transfers (non-SWIFT)

The rest of this guideline provides information about the reporting requirement for international "non-SWIFT" EFTs. This applies to you if you are a financial entity, a money services business or a casino. An EFT is the transmission of instructions for a transfer of funds through any electronic, magnetic or optical device, telephone instrument or computer. In this context, SWIFT EFT messages are excluded, as explained in subsection 3.3.

You have to send a non-SWIFT EFT report to FINTRAC for the following transactions.

Outgoing EFTs

These are instructions sent electronically for the transfer of \$10,000 or more outside Canada at the request of a client in the following manner:

in a single transaction; or

in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:

if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or

if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Outgoing International Non-SWIFT EFT Report (EFTO) to FINTRAC.

It can happen that a client requests a transfer of funds and, instead of sending the EFT yourself, you order someone else that is a financial entity, a money services business or a casino in Canada to send it. In this case, you have to make the related EFT report (EFTO) to FINTRAC unless you provide them with the client's name and address. In other words, if you give them your client's name and address, you do not have to report the EFT. See Appendix 3 for example scenarios of this type of situation.

If you send an EFT on your own behalf (not on behalf of a client) to an individual or entity in Canada, you do not have to report it, even if the final recipient of the funds is outside Canada

Incoming EFTs

These are instructions sent electronically for the transfer of \$10,000 or more from outside Canada at the request of a client in the following manner:

in a single transaction; or

in two or more transfers of less than \$10,000 each (that total \$10,000 or more) in the following 24-hour rule situations:

if you are an entity, your employee or senior officer knows the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity; or

if you are an individual, you know the transfers were made within 24 consecutive hours of each other by or on behalf of the same individual or entity.

This type of EFT requires that you send an Incoming International Non-SWIFT EFT Report (EFTI) to FINTRAC.

If you are a financial entity, a money services business or a casino and you received instructions for a transfer of funds from outside Canada, you have to make the related EFT report (EFTI) to FINTRAC, even if you have to forward the same instructions to another financial entity, money service business or casino in Canada. However, if you receive instructions for a transfer of funds from outside Canada from another financial entity, money services business or casino in Canada, **you do not have to make an incoming EFT report, as long as the EFT contained the name and address of the beneficiary.** If the EFT did not contain the name and address of the beneficiary and the original sender was outside Canada, you also have to make an incoming EFT report. This is true even if you do not get a copy of the instructions received by the other financial entity, money services business or casino.

Guide 10A

<http://www.fintrac.gc.ca/publications/guide/Guide10A/10A-eng.asp#s2-2>.

2.2 When does a casino disbursement report have to be made?

In the context of casino disbursement reports, only disbursements that you pay out in the following types of transactions must be reported:

- **redemptions of slot tickets, chips, tokens or plaques;**
- **front cash withdrawals;**
- safekeeping withdrawals;
- advances on any form of credit, including advances by markers or counter cheques;
- payments on bets, including slot jackpots;
- payments to clients of funds received for credit to that client or any other client;
- cashing of cheques or other negotiable instruments; and
- reimbursements to clients of travel and entertainment expenses.

This includes amounts paid out in cash, by cheque, by transfer or many other methods, but it only includes amounts paid out to a casino client or patron and only if they were paid out for the types of transactions listed above. However, in this context, disbursements exclude any amounts that you pay out in casino chips, tokens or slot tickets.

A disbursement does not include the following:

- a payment for services or goods to the casino's staff, suppliers or entertainers
- **an amount deposited to the casino's bank account**
- an amount deposited to a front money account
- an amount applied to a casino credit account
- an advance on a client's credit card, unless the credit card was issued by the casino
- a "comp" (complimentary) payment or redemption of player points
- a cash bonus payment (rewards program)
- cash received by the casino (see *Guideline 7: Submitting Large Cash Transaction Reports to FINTRAC* for information about when receipts of cash are reportable)

Ross Alderson CAMS.

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•Yes, and...•

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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.

Kevin Simcoe

From:
Sent:
To:
Subject: s 15(1)

Ross

Thanks for taking action on this so quickly. This looks really encouraging.

Given the low cost, once your team and Dan assess the tool, if you find it satisfactory I think we should implement immediately. I believe I have sufficient funds in my consulting budget to more than cover this. I have copied Nicole and will ask her to verify that is the case.

So to summarize next steps:

- Your team and Dan will assess the s 15(1) module.
- If satisfactory we will implement immediately.
- We will need to assess the s 15(1) module against the functioning we expect to get from the SAS tool if possible.

From: Ross Alderson
Sent: October-14-16 8:23 PM
To: Rob Kroeker
Subject: s 15(1) BI

Hi Rob,

In relation to the s 15(1) BI tool:

The BI tool has been installed in the Secure Staging environment (with prod data) and ready for s 15(1) to s 15(1), s 17(1) Dan THOMPSON will be able to remotely host the application and pass control to s 15(1) during the meeting, and can facilitate access to the tool afterwards.

James MOORE has come back with the following information:

- The cost to install the s 15(1), s 17(1)
- There is no difference in cost for adding to s 15(1) platform vs web based; it is one and the same. According to Dan THOMPSON, all of s 15(1) is now web based, s 15(1), s 17(1), so there is no additional hardware costs. s 15(1), s 17(1)
- The timeframe for integrating this tool would be immediate as s 15(1) out of the box is fully integrated into most existing s 15(1) modules;
- James has confirmed that the planned upgrade for s 15(1), s 17(1)

s 15(1), s 17(1)

Let me know if you need anything else.

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

This is outstanding. Great work.

From: Ross Alderson
Sent: October-17-16 3:05 PM
To: Rob Kroeker
Subject: MNP response plan

Draft version 1.0 attached

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks. Very disappointing.

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Tuesday, October 18, 2016 3:28 PM
To: Rob Kroeker
Subject: SAS update

Hi Rob,
Just came from a SAS AML project schedule review meeting with Ranj and some of the operational folks. Ranj received a revised schedule from SAS.
They are now claiming **June – August 2017** as a potential launch date contingent on us holding their hand through the process. Ranj will provide you an email later today with more details.

Regards

Ross Alderson CAMS.
Director, AML & Investigations
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2940 Virtual Way, Vancouver, BC, V5M 0A6
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●Yes, and...●

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks for all the work on this Ross.

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Tuesday, October 18, 2016 3:01 PM
To: Rob Kroeker
Subject: RE: OLG Draft presentation

Done. Will send out final copy shortly
Ross Alderson CAMS.
Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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●Yes, and...●

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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.

From: Rob Kroeker
Sent: Tuesday, October 18, 2016 2:56 PM
To: Ross Alderson
Subject: Re: OLG Draft presentation

Hi.

Looks good. On slide 5 can we adjust it so BCLC and GPEB are at the same level

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Tuesday, October 18, 2016 9:42 AM
To: Rob Kroeker
Subject: RE: OLG Draft presentation

Hi Rob, please find attached an updated PPT with requested changes
Please let me know if these meet your needs, or alternatively you would like additional changes
Regards

Ross Alderson CAMS.
Director, AML & Investigations
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●Yes, and...●

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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.

From: Rob Kroeker
Sent: Monday, October 17, 2016 3:07 PM
To: Ross Alderson
Subject: RE: OLG Draft presentation
Thanks Ross.

From: Ross Alderson
Sent: October-17-16 3:06 PM
To: Rob Kroeker
Subject: RE: OLG Draft presentation
No problem. Will get those changes done for tomorrow
Ross Alderson CAMS.
Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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●Yes, and...●

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Monday, October 17, 2016 2:21 PM
To: Ross Alderson
Subject: RE: OLG Draft presentation
Great effort.
Few changes on the slides I'll speak to:
Slide 3

- Can you list out areas instead of org chart/photos

Slide 4

- In the speaking points – can you please add notes with total # of casino service providers, % of business the big three comprise of total casino/bingo business.

Slide 5

- Rather than screen shot can we have org chart style slide with Government at the top - then Minister of Finance below on second line – then BCLC and GPEP on the third and final line each showing a separate connection up to Minister of Finance.

Slide 6

- As with slide 5, can we move from screen shot to just a summary of JIGIT mandate – (way too much text for a ppt slide)
- Bullet noting JIGIT is a section within CFSEU
- Bullet noting CFSEU is administratively run by RCMP but comprised of both RCMP and Municipal police members.

Thanks!

R

From: Ross Alderson
Sent: October-17-16 1:26 PM
To: Rob Kroeker
Subject: OLG Draft presentation
Hi Rob.

Here is the draft presentation.

Let me know if you would like to see any changes

I have you doing the intro and 6 slides which sets up the landscape.

It works out to an average of 1 min per slide which should give us ample time for questions

Ross Alderson CAMS.

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●*Yes, and...*●

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Hi Ross

I am not comfortable approving the amount proposed until we decide direction. Can you discuss with Mike approving sufficient funds to get us to the end of November instead?

Rob

From: Ross Alderson
Sent: October-23-16 4:38 PM
To: Rob Kroeker
Subject: Fw: AML Variance
Importance: High

Hi Rob,
How would you like me to move forward?
This is the additional \$370k I have so far held back on
Regards

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Ranj Panikkar <RPanikkar@bcllc.com>
Sent: Sunday, October 23, 2016 2:51 PM
To: Ross Alderson; Bill White
Subject: FW: AML Variance

Hi Ross, Bill,

As you know I have submitted a project variance form for additional funding to the end of this fiscal year. I understand that the extension on this project and any further funding for internal resources is still under discussion, however, I need to point out the implication of delaying past the end of October: the project is essentially out of funding and will not be able to continue past October 31 without an increase in available capital or exemption of some kind to pay the vendors for work already incurred. I would appreciate your advice on how to move forward.

Regards,
Ranj

From: Jennifer Blasko
Sent: Thursday, October 20, 2016 8:04 AM
To: Ranj Panikkar
Subject: AML Variance

Hi Ranj,

I checked with Finance regarding the approvals of the 2 PR's pending - their response: *"It would go against our controls to let that when through, especially with the sensitivity around the variance right now. Mike Hays said that the SC is meeting on Friday to determine the direction, so hopefully a decision will be made on how to deal with the variance to date."*

We'll have to wait until the decision tomorrow, assuming it's this Friday Mike was talking about?

Keep me posted and hopefully we can get them out of the queue soon.

Regards,
Jennifer

Jennifer Blasko
Senior Project Analyst
BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2
T 250 828 5515 C s 17(1)

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[bclc.com](#)

Kevin Simcoe

From:
Sent:
To:
Subject:

I don't have a copy as of yet. I think Jim wants to see what GPEB has to say about it on Thursday.

I have attached what I drafted, but don't know to what extent Jim edited it, so not for sharing. I will let you know when I get a copy.

R

From: Ross Alderson
Sent: October-25-16 3:20 PM
To: Rob Kroeker
Subject: Jim's Letter to JM

Hi Rob, is it ok if I can get a copy of Jims letter to John Mazure for my records and to give me an understanding of our position prior to my next meeting with Anna.

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Ross

s 22

Thanks for the follow up on this.

Rob

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Wednesday, October 26, 2016 2:45 PM
To: Rob Kroeker
Subject: RE: VP Sign Off: BCLC FOI Request 16-056

Rob,
I met with Noah and Kris on Monday to discuss current practices around sports betting.
At a high level in summary:

Y/The landscape in 1994 was very different with s 15(1)

Y/In land based lottery there are a number of controls s 15(1)

Y/On line there are similar controls s 15(1)

Let me know if you require further

Regards

Ross Alderson CAMS.

Director, AML & Investigations

Corporate Security and Compliance Division, BCLC

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•Yes, and...•

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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.

From: Rob Kroeker
Sent: Friday, October 21, 2016 3:16 PM
To: Ross Alderson
Subject: RE: VP Sign Off: BCLC FOI Request 16-056
Thanks Ross

From: Ross Alderson
Sent: October-21-16 3:11 PM

To: Rob Kroeker

Subject: RE: VP Sign Off: BCLC FOI Request 16-056

Hi Rob,

I just reviewed the file. Yes, interesting request considering its 24 years ago.

While we still have Sports Action over/under today I am not aware of any sports related AML files. s 15(1)

I will talk to Kris and Noah next

week to gather some more details and get you something more definitive.

Ross Alderson CAMS.

Director, AML & Investigations

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•Yes, and...•

ralderson@bcl.com

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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.

From: Heather Mass

Sent: Friday, October 21, 2016 2:06 PM

To: Rob Kroeker

Cc: Nicole Wu; Ross Alderson

Subject: RE: VP Sign Off: BCLC FOI Request 16-056

Hi Rob,

I sent both the analysis and records to Ross first thing this morning. Please let me know if you require anything else.

Regards,

Heather

From: Rob Kroeker

Sent: Friday, October 21, 2016 2:00 PM

To: Heather Mass

Cc: Nicole Wu; Ross Alderson

Subject: FW: VP Sign Off: BCLC FOI Request 16-056

Hi Heather

May I please ask you to send Ross Alderson the analysis and documents to be released related to the file below. I we want to check to make sure we don't have any issues similar to this past event.

Thanks,

Rob

From: Rob Kroeker

Sent: Wednesday, October 19, 2016 8:46 PM

To: Ross Alderson

Subject: FW: VP Sign Off: BCLC FOI Request 16-056

Hi Ross

Please see the impending FOI release by clicking on the link below. It is interesting such an old issue is being inquired about. Would you please discuss with Noah to determine if we offer any similar games today and whether there is any chance we still face this type of risk.

Thanks,

Rob

From: Heather Mass

Sent: October-19-16 12:46 PM

To: Rob Kroeker; Susan Dolinski

Cc: Nicole Wu; Sandra Newvine

Subject: VP Sign Off: BCLC FOI Request 16-056

Good afternoon Rob and Susan,

The following file is ready for your review and sign off:

[BCLC Freedom of Information Request 16-056](#)

BCLC's response is due October 28, 2016.

Your response by **Monday, October 24, 2016** is appreciated.

Thank you,

Heather Mass

Senior Information & Privacy Analyst

BCLC, 74 West Seymour Street, Kamloops B.C. V2C 1E2

T 250 852 5468 F 250 828 5697

[●Yes, and...●](#)

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Just back from Victoria. Let's try to connect when you have a break tomorrow

Sent from s 15(1)(l)

From: Ross Alderson
Sent: Thursday, October 27, 2016 5:45 PM
To: Rob Kroeker
Subject: RE: Info Sharing update

Just sent it to you.
s 22

I will be here in the office for at least another 45 minutes if you want me to call you
Ross Alderson CAMS.
Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Thursday, October 27, 2016 3:30 PM
To: Ross Alderson
Subject: Re: Info Sharing update
Are you in the office tomorrow? Let's chat before you put effort into the reply.
Sent from s 15(1)(l)

From: Ross Alderson
Sent: Thursday, October 27, 2016 3:24 PM
To: Rob Kroeker
Subject: RE: Info Sharing update

Got the email. (you were cc'ed) I will draft a response and send it to you before further dissemination
Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker

Sent: Thursday, October 27, 2016 1:51 PM

To: Ross Alderson

Subject: RE: Info Sharing update

You might get an e-mail from Len on this (just chatted with him) . Let's you and I discuss before you respond. There is much alignment but how we word our response will be important .

From: Ross Alderson

Sent: October-27-16 10:51 AM

To: Jennifer Keim; Rob Kroeker

Cc: Kevin Sweeney

Subject: RE: Info Sharing update

s 14, s 22

Regards

Ross Alderson CAMS.

Director, AML & Investigations

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

T 604 225 6382 Cs 17(1) F 604 225 6488

●Yes, and...●

ralderson@bclc.com

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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.

From: Jennifer Keim

Sent: Thursday, October 27, 2016 9:10 AM

To: Rob Kroeker; Ross Alderson

Cc: Kevin Sweeney

Subject: RE: Info Sharing update

s 14

Regards,

M. Jennifer Keim

General Counsel

BCLC, 74 W. Seymour St., Kamloops, BC V2C 1E2

T 250 828-5557 F 250 828-5637

Email: jkeim@bclc.com

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NOT FORWARD THIS EMAIL.

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

From: Rob Kroeker
Sent: October-27-16 9:08 AM
To: Ross Alderson
Cc: Jennifer Keim; Kevin Sweeney
Subject: RE: Info Sharing update

Ross

Thanks for this update. We need to stay on side with the legal requirements in fact and in spirit. Having said that keep in mind that GPEB does have a broad, essentially limitless, authority to demand and receive info from us where they are conducting a bona fide investigation or audit. I know you will keep this in mind. While I want us to make sure we have proper protocols and controls I also want us to facilitate the flow of info as far as possible – especially providing them with generic data like monthly LCT and STR trends. So even where we feel GPEB is being unreasonable we need to be as flexible and accommodating as we can. In other words, keep the channels of communication open and take the softest approach possible. Are you Kevin and Anna continuing to meet monthly? Perhaps a few additional meetings with her and Bob on this subject are in order to get the path smoothed out.

Rob

From: Ross Alderson
Sent: October-26-16 3:42 PM
To: Rob Kroeker
Cc: Jennifer Keim; Kevin Sweeney
Subject: Info Sharing update

Hi Rob,

Had a call with Bob STEWART from GPEB today who wanted to discuss the two recent Sect 86 requests involving 2 x Gaming Worker data and a month's worth of STR's. The crux of the call was to clarify purpose of the investigation in the Sect 86(1) request and clarifying that an ^{s 15(1)} report is not the same as an ^{s 22}

(Note: this is only related to Casino STR

and related activity at this point.)

^{s 22}, although could not point to a single example of where they had not received info on request. He also stated that they will likely ask for all unsubstantiated UFT's as that was also "evidence of potential money laundering" and if we continued to be difficult they would likely circumvent the request by getting the data straight from the SP's. I have briefed Kevin and he has concerns that could constitute a breach of privacy laws.

We discussed that there were a number of action items from the last meeting including a GPEB PIA which would be shared jointly with BCLC and GPEB would also provide details of their data management practices, neither of which has happened. He seemed unaware of either. I will touch base with Anna to discuss further.

He stated they had escalated the "hard copy issue" to Victoria so you may get a call.

Regards

Ross Alderson CAMS.

Director, AML & Investigations

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

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●Yes, and...●

ralderson@bcl.com

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Kevin Simcoe

From:
Sent:
To:
Subject:

If you have a break around 10 - maybe 5 min call then.

From: Ross Alderson
Sent: October-28-16 7:45 AM
To: Rob Kroeker
Subject: Re: Requests for Information from GPEB

Roger that. Is there a time (s) that works best. I just tried your cell.

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Friday, October 28, 2016 7:22 AM
To: Ross Alderson
Subject: RE: Requests for Information from GPEB

Hi

Most of this might be better for a conversation. Consider a short e-mail just saying we are looking for confirmation of file number, type of investigation (e.g. theft) and GPEB member responsible to bring the info flow in line with the GCA, FOIPPA and good practice. We are concerned about lack of security around e-mail electronic copies of sensitive records containing personal information. Hard copies is first and easiest way to mitigate that risk but we are open to secure electronic transfer if we can set that up.

I think with that you will satisfy Len and can then focus efforts back with Anna and Bob to get secure and practical processes in place.

If you have time on a break let's have a quick chat.

From: Ross Alderson
Sent: October-27-16 5:45 PM
To: Rob Kroeker
Subject: FW: Requests for Information from GPEB

My proposed response:

Hi Len,

Thank you for your email.

Yes, Bob called me yesterday to discuss a couple of recent section 86(1) requests. Essentially BCLC had asked for further detail in the actual Sect86(1) so that we could fully accommodate the request and that appeared to be the basis for the call.

During the conversation Bob also outlined concern for providing rationale for the investigation in a Sect 86(1). However you have since addressed that in your email. He was also concerned that I was being intentionally uncooperative by requiring a GPEB staff member to attend the BCLC Vancouver office to collect copies of STR reports and sign for them.

It should be noted that Anna and I had discussed on two separate occasions that any request for STR's would likely take place once a month.

As I am sure you are aware the OIPC has made a number of comments recently regarding the disclosure of personal information particularly as it pertains to Government entities. The recent review BCLC conducted on information sharing has highlighted that BCLC currently use multiple methods to provide information to GPEB. For example in the Investigations and Compliance world

- Y/GPEB Audit has open access to BCLC systems, albeit in a controlled environment with no printing capability

- Y/eGaming Investigation files are mostly transferred via SFTP servers

- Y/Lottery Investigations transfer data via email from Salesforce.

- Y/Most Casino Investigation information is obtained by GPEB directly from SP Surveillance in hard copy form and is signed for at the site. Most of these practices have been in place for a number of years.

- Y/Some data is transferred via unsecure email

As a result of that review BCLC made only one change to process. It was identified that because of the sensitivity of the information and the amount of personal information contained in a STR that this was the highest risk area for a Privacy Breach. The decision was made to stop sending copies of STR reports to GPEB without a formal request for information. STR information like any information is always readily available on request. Providing hard copies was consistent with current casino practices, expectations of our privacy group and GCA Sect 79 requirements. It should also be noted I had mentioned this proposed change with Derek, Anna and Bob for months previously before the actual change was implemented.

At a GPEB/BCLC compliance meeting conducted on October 7th, 2016 info sharing processes were discussed in detail. Anna agreed to provide details of a GPEB Privacy Impact Assessment (PIA) with BCLC which would cover GPEB's data management and data protection practices. believe that PIA is underway. As s 22 I intended to touch base with s 22

s 22 As a sign of cooperation in that meeting BCLC advised there would be no changes to existing information flows for eGaming, Lottery Investigations or for Compliance Audits until we had all had the chance to independently review our practices further and discuss the PIA. We also hoped there would soon be further clarity on Roles and Responsibilities which would help define some of the processes. Anna, Kevin and I will reconvene next month to discuss our findings and hopefully come to an agreement which will include addressing the method of sharing information.

I certainly don't purport to be an expert on privacy and I don't have any specific concerns related to FOIPPA as in my mind this appears to relate directly information sharing practices allowed under the GCA. Of course FinTRAC and RCMP are not bound by Section 79 of the GCA therefore any information sharing we have with them is governed differently.

Please feel free to call me direct should you have any further questions

Kind Regards

Ross

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC

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From: Meilleur, Len FIN:EX [<mailto:Len.Meilleur@gov.bc.ca>]

Sent: Thursday, October 27, 2016 3:18 PM

To: Ross Alderson

Cc: Rob Kroeker; Anna Fitzgerald

Subject: Requests for Information from GPEB

Hi Ross,

I saw Rob today and mentioned that Bob Stewart sent me an email about a call he had with you yesterday. Would you be able to advise me as to what the concern is, meaning what section of FOIPPA we are speaking about that you have concerns and how you manage that information going out to the RCMP, FINTRAC or JIGIT. I wouldn't think they have to appear in person to sign for the information.

I advised Rob that we WILL provide with any request the file no and the offence type (CC or CGA and section) . I believe that is reasonable. We may also wish to look at information being sent out by email and doing it through an encrypted portal which may make sense. Rob agrees in principle

I thank you and look forward to your response.

I will be back in the office tomorrow.

Len

J.E.L. (Len) Meilleur

Executive Director

Compliance Division

Gaming Policy Enforcement Branch

Ministry of Finance

Location: 3rd Floor, 910 Government Street, Victoria BC V8W 1X3

Mailing Address: P.O. Box 9309 Stn Prov Govt, Victoria BC V8W 9N1

[Tel:250-356-6320](tel:250-356-6320) Fax:250-356-0782

E-mail: len.meilleur@gov.bc.ca

Website: www.gaming.gov.bc.ca

If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.

Kevin Simcoe

From:
Sent:
To:
Subject:
Attachments:

Hi Ross

Thanks for having this drafted up. I have made a few revisions.

Please feel free to ask Nicole to assist with drafting the letters up.

Rob

From: Ross Alderson
Sent: October-27-16 6:03 PM
To: Rob Kroeker
Subject: Sample Letter for SP's

Rob,

Please find attached a sample letter for the SP to sign on Monday at our compliance meeting. If/when you are ok with this I will get the rest drafted.

s 14

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

●Yes, and...●

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Cc:
Subject:
Attachments: s 17(1)

Hi Ross

I've discussed with Brad D and given the importance and value of the data this work will produce we are going to proceed. Couple of things I need your assistance with:

1. We need a lead for BCLC – I am thinking Bal would be the best fit?
- s 17(1)

Let's touch base on this next week when we are both in the office.

Rob

From: Karen Kelly [mailto:kkelly@ipsaintl.com]
Sent: October-20-16 11:58 AM
To: Rob Kroeker
Cc: Kim Marsh
Subject: s 17(1)

Hi Rob,
s 17(1)

Best Regards,
Karen

Karen Kelly, CAMS
Senior Project Coordinator
IPSA International

A root9B Technologies, Inc. company
Cybersecurity and Regulatory Risk Mitigation

Office: 604.633.1750 Ext. 212
Mobile: s 22
Facsimile: 604.633.1751
Email: kkelly@ipsaintl.com

About IPSA: IPSA International, a root9B Technologies, Inc. company, is a regulatory risk mitigation firm delivering advisory and investigative services globally in the areas of Anti-Money Laundering, Investigative Due Diligence, Enterprise Risk Management and Litigation Support. Our clients include public and private middle market businesses, multi-national corporations, financial institutions and governments. IPSA International has offices in the US, UK, Canada, UAE and Hong Kong, resources in over 75 countries and research capabilities in 20 languages. For more information, please visit us at www.ipsaintl.com.

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Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks for the update Ross. Is the site behind the crime scene or is it operating?

From: Ross Alderson
Sent: November-01-16 9:03 AM
To: Angela Koulyras; Rob Kroeker; Laura Piva-Babcock; Brad Desmarais
Cc: Susan Dolinski; Kris Gade
Subject: RE: CHAN: Breaking - VPD investigation near Edgewater

Update:

s 15(1)

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bcl.com

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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.

From: Angela Koulyras
Sent: Tuesday, November 01, 2016 8:16 AM
To: Rob Kroeker; Ross Alderson; Laura Piva-Babcock; Brad Desmarais
Cc: Susan Dolinski; Kris Gade
Subject: RE: CHAN: Breaking - VPD investigation near Edgewater

According to Global there will be a 10:30am police news conference.

From: Rob Kroeker
Sent: Tuesday, November 01, 2016 7:17 AM
To: Ross Alderson; Laura Piva-Babcock; Brad Desmarais
Cc: Susan Dolinski; Angela Koulyras; Kris Gade
Subject: RE: CHAN: Breaking - VPD investigation near Edgewater

Thanks Ross and Kris for jumping on this.

From: Ross Alderson
Sent: November-01-16 6:57 AM
To: Laura Piva-Babcock; Rob Kroeker; Ross Alderson; Brad Desmarais
Cc: Susan Dolinski; Angela Koulyras; Kris Gade
Subject: Re: CHAN: Breaking - VPD investigation near Edgewater

s 15(1)

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Laura Piva-Babcock
Sent: Tuesday, November 1, 2016 6:40 AM
To: Rob Kroeker; Ross Alderson; Brad Desmarais
Cc: Susan Dolinski; Angela Koulyras
Subject: Re: CHAN: Breaking - VPD investigation near Edgewater

Thanks.

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Tuesday, November 1, 2016 6:38 AM
To: Laura Piva-Babcock; Ross Alderson; Brad Desmarais
Cc: Susan Dolinski; Angela Koulyras
Subject: Re: CHAN: Breaking - VPD investigation near Edgewater

Working on it

Sent from my s 15(1)(l)

From: Laura Piva-Babcock
Sent: Tuesday, November 1, 2016 6:24 AM
To: Rob Kroeker; Ross Alderson; Brad Desmarais
Cc: Susan Dolinski; Angela Koulyras
Subject: Fw: CHAN: Breaking - VPD investigation near Edgewater

Any word on what this may be ?

Sent from my s 15(1)(l)

From: tno@gov.bc.ca
Sent: Tuesday, November 1, 2016 6:22 AM
Subject: CHAN: Breaking - VPD investigation

CHAN (Global BC - Vancouver)
Global BC Morning News
01-Nov-2016 06:00

There is a large VPD presence near the Edgewater Casino and the Harbour Event Centre. There is no word yet on what is happening. [mjag]

[TNO...](#)

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Kevin Simcoe

From:
Sent:
To:
Subject:

Hi – have you had a chance chat with Bal. If so I'll turn Karen over to her to get the contract roughed out while I am away

From: Karen Kelly [mailto:kkelly@ipsaintl.com]
Sent: November-01-16 2:59 PM
To: Rob Kroeker
Subject: Following up

Hi Rob,

s 17(1)

Kind Regards,
Karen

Karen Kelly, CAMS
Senior Project Coordinator
IPSA International

A root9B Technologies, Inc. company
Cybersecurity and Regulatory Risk Mitigation

Office: 604.633.1750 Ext. 212
Mobile: s 22
Facsimile: 604.633.1751
Email: kkelly@ipsaintl.com

About IPSA: IPSA International, a root9B Technologies, Inc. company, is a regulatory risk mitigation firm delivering advisory and investigative services globally in the areas of Anti-Money Laundering, Investigative Due Diligence, Enterprise Risk Management and Litigation Support. Our clients include public and private middle market businesses, multi-national corporations, financial institutions and governments. IPSA International has offices in the US, UK, Canada, UAE and Hong Kong, resources in over 75 countries and research capabilities in 20 languages. For more information, please visit us at www.ipsaintl.com.

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Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks Ross. Once we have that info we need to work with Laura to develop some response points along the lines that we are not going to comment on a matter before courts but we will say that a casino customer cannot cash a bank draft and leave with that cash without play or make a deposit to another customer's account.

From: Ross Alderson
Sent: November-12-16 2:02 PM
To: Rob Kroeker
Subject: Re: \$7.5 million missing from lawyer's trust disrupts real estate deals | Vancouver Sun

Hi Rob, s 22

I will have the AML team summarize the play and get

that to you Monday.

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Rob Kroeker
Sent: Saturday, November 12, 2016 11:43 AM
To: Ross Alderson
Subject: Fwd: \$7.5 million missing from lawyer's trust disrupts real estate deals | Vancouver Sun

Hi Ross - suspect you are already on this, we need to confirm if the money was transferred as reported or played and lost.

Rob

Sent from my s 15(1)(l)

Begin forwarded message:

From: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Date: November 12, 2016 at 12:16:21 PM CST
To: Susan Dolinski <SDolinski@BCLC.com>, Angela Koulyras <AKoulyras@BCLC.com>, Jessica Gares <JGares@bclc.com>, Rob Kroeker <RKroeker@bclc.com>, Ross Alderson <RAlderson@BCLC.com>, Brad Desmarais <BDesmarais@bclc.com>
Subject: \$7.5 million missing from lawyer's trust disrupts real estate deals | Vancouver Sun

FYI.

<http://vancouversun.com/news/local-news/7-5-million-missing-from-richmond-lawyers-trust-account-disrupts-real-estate-transactions>

Sent from my s 15(1)(l)

Kevin Simcoe

From:
Sent:
To:
Subject:

Good work Ross. The article is much more balanced than we have been experiencing in the past.

From: Jim D. Lightbody
Sent: November-13-16 11:48 PM
To: Laura Piva-Babcock; Susan Dolinski; Brad Desmarais; Rob Kroeker; Ross Alderson
Cc: Angela Koulyras; Jessica Gares; Claire Bennett
Subject: Re: Sam Cooper article

Good work everybody. I concur with Laura, it's as good as we can get. Well done Ross, Jessica and Claire.
Thanks,
Jim

Sent from my s 15(1)(l)

From: Laura Piva-Babcock
Sent: Sunday, November 13, 2016 10:03 PM
To: Susan Dolinski; Brad Desmarais; Rob Kroeker; Ross Alderson; Jim D. Lightbody
Cc: Angela Koulyras; Jessica Gares; Claire Bennett
Subject: Sam Cooper article

Hi,

Here is the article with Ross' interview/quotes included that will be published tomorrow in the Sun. s 22
Thanks again Ross for your participation and Jessica and Claire for supporting.

<http://vancouversun.com/news/local-news/9999-casinos>

Regards,

Laura Piva-Babcock
Director, Communications
74 West Seymour Street, Kamloops, B.C. V2C 1E2
T 250 828 5576 C s 17(1)

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Each year, revenue from gambling contributes more than \$1 billion to fund important provincial, municipal and charitable programs across B.C.

Kevin Simcoe

From:
Sent:
To:
Subject: s 15(1), s 16, s 22
Attachments: s 22

Hi Ross

Do we know any of the named defendants?

Rob

From: Meilleur, Len FIN:EX [mailto:Len.Meilleur@gov.bc.ca]
Sent: November-14-16 7:59 AM
To: Rob Kroeker
Cc: Anna Fitzgerald
Subject: FW: Civil Forfeiture - s 15(1), s 16, s 22

Hello Rob,

I was informed the CFO obtained civil forfeiture of the attached noted property pursuant to an Order for Default Judgment. The subject may be known to you folks. s 13(1), s 15(1)

FYI and any action you deem appropriate with respect to s 22 and s²² associates.

Regards,

Len

J.E.L. (Len) Meilleur
Executive Director
Compliance Division
Gaming Policy Enforcement Branch
Ministry of Finance
Location: 3rd Floor, 910 Government Street, Victoria BC V8W 1X3
Mailing Address: P.O. Box 9309 Stn Prov Govt, Victoria BC V8W 9N1
Tel:250-356-6320 Fax:250-356-0782
E-mail: len.meilleur@gov.bc.ca
Website: www.gaming.gov.bc.ca

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Kevin Simcoe

From:
Sent:
To:
Subject:

I will be in before noon

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Monday, November 14, 2016 8:55 AM
To: Rob Kroeker
Subject: RE: Privacy Breach

Copy that. I met with Anna last Wednesday and the management teams meet today as a group. When you have time over the next couple of days I can brief you on that and other matters
Regards

Ross Alderson CAMS.
Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 **C** s 17(1) **F** 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Monday, November 14, 2016 8:48 AM
To: Ross Alderson
Subject: Privacy Breach

Hi
This timely. You may want to raise directly with Anna at your next meeting. I will do same with Len.
Rob

Casino data theft sparks talk of class-action suit

Vancouver Sun
Saturday, November 12, 2016
Page N03
By Colin Perkel



Class-action lawyers wasted little time Friday in jumping in on word of a cyberattack on an Ontario **casino** in which sensitive information was stolen.

They announced plans for a lawsuit that would seek \$50 million in damages from **Casino Rama**, north of Toronto, and began asking possible victims to sign on.

"The class action will be commenced on behalf of employees, customers and vendors of the **Casino Rama Resort** whose confidential information was compromised by the privacy breach," the lawyers said.

"The proposed representative plaintiffs in the lawsuit are customers who gave the resort their confidential information, including financial information." The statement of claim would be filed in Superior Court on Monday given the Remembrance Day holiday on Friday, said lawyer Ted Charney, one of those involved.

On Thursday, **Casino Rama** Resort in Rama, Ont., warned its customers, vendors as well as current and former staff to keep an eye on their bank accounts, credit cards and other financial information. The **casino** said it had "recently" discovered it was the victim of a cyberattack that resulted in the large-scale data theft.

Stolen data appeared to include internal financial and security-incident reports, emails, payroll and client information, social insurance numbers, and dates of birth.

"The hacker claims that the employee information dates from 2004 to 2016, and that some of the other categories of information taken date back to 2007," the **casino** said in a statement on its website. "We can confirm that certain employee and customer information was stolen."

The statement also warned the hacker could publish the stolen data.

"This is a massive privacy breach," Charney said in announcing the proposed lawsuit.

"We still do not know the whole story but it looks like **Casino Rama** rolled the dice with employee, customer and vendor data, rather than invest in state-of-the-art security measures."

No allegations have been tested in court and it was still much too early for any statement of defence.

"We continue to work with the proper authorities on the ongoing investigation and are limited in how much detail we can provide," **casino** spokeswoman Jenna Hunter said in an email Friday. "We deeply regret the this situation and recognize the seriousness of the issue."

The two law firms involved in the proposed action are Charney Lawyers and Sutts, Strosberg. !@COPYRIGHT=©
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Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks Ross.

Do we know attendance yet ?

From: Ross Alderson
Sent: November-14-16 1:17 PM
To: Rob Kroeker
Subject: ACAMS presentation

Rob, Below is a hyperlink to a clipped video for your presentation (was too big to email) It's a touch under 3 minutes but gives you all the relevant info in my opinion.

Attached to email is a description of the video content

s 15(1)(l), s 22

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject: s 22

Ross

s 22

Rob

From: Ross Alderson
Sent: November-15-16 6:36 PM
To: Kris Gade; Bal Bamra; Daryl Tottenham
Cc: Kevin Sweeney; Nicole Wu; Jennifer Keim; Rob Kroeker
Subject: Re: s 22

Hi all,
Change of plans. s 22

Daryl and Bal you can relax , I will do my own presentation next week:)

s 22

See you tomorrow

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Ross Alderson
Sent: Tuesday, November 15, 2016 12:28 PM
To: Kris Gade; Bal Bamra; Daryl Tottenham
Cc: Kevin Sweeney; Nicole Wu; Jennifer Keim; Rob Kroeker
Subject: s 22

Hi guys,
As a result of recent communication with s 22

I will speak to you all over next few days to cover off any urgent needs

Regards

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

Kevin Simcoe

From:
Sent:
To:
Subject:

I have lunch with Jag coming up. I chat with him about it and see what their perspective is.

From: Ross Alderson
Sent: November-16-16 4:21 PM
To: Rob Kroeker
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

I did speak ^{s 15(1), s 16} last week. s 22
meeting Monday. s 22

which is probably why there was an additional

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bcl.com

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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.

From: Rob Kroeker
Sent: Wednesday, November 16, 2016 4:05 PM
To: Ross Alderson
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

I sent on Kris' note and Bob's response to Len. Len responded he had no concerns and felt matter was handled appropriately. Have you spoken ^{s 15(1), s 16} – are they okay with what transpired?

From: Ross Alderson
Sent: November-16-16 2:59 PM
To: Rob Kroeker
Cc: Kevin Sweeney
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Rob,

Kris spoke to Ken ACKLES today re this file.

Kris summarized Ken's response

- At no time was there a public safety risk
- The request was not gaming related
- The file number provided at the time is not correct
- The request was on behalf of the s 15(1), s 16

- Kris outlined his concerns re possible privacy breach involving Gateway. Ken said "we" reached out to Irfan at Gateway and stated it has since been resolved and does not impact BCLC.

s 15(1), s 16, s 22

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Wednesday, November 16, 2016 11:13 AM
To: Ross Alderson
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

As discussed s 22

From: Ross Alderson
Sent: November-15-16 10:49 AM
To: Rob Kroeker
Subject: Fw: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

From: Kris Gade <KGade@BCLC.com>
Sent: Wednesday, November 9, 2016 4:01 PM
To: Ross Alderson; Bruno Gatto; Kevin Sweeney

Subject: Fw: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

FYI...

Kris Gade, CAMS
Manager, Investigations
Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver BC. V5M 0A6

T 604 228 3011 C^s 17(1)

●Yes, and...●

kgade@bclc.com

bclc.com

From: Kris Gade <KGade@BCLC.com>
Sent: Wednesday, November 9, 2016 16:00
To: Ackles, Kenneth; 'Stewart, Robert A FIN:EX'
Subject: Re: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Cheers, thanks Ken.

Kris Gade, CAMS
Manager, Investigations
Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver BC. V5M 0A6

T 604 228 3011 C^s 17(1)

●Yes, and...●

kgade@bclc.com

bclc.com

From: Ackles, Kenneth
Sent: Wednesday, November 9, 2016 15:50
To: 'Stewart, Robert A FIN:EX'
Cc: Kris Gade
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Thanks Bob

s 22 I will speak to him in relation to the below noted matter and clarify any of the information of concern, however I agree that this may not on the face of the information attached be of concern to BCLC if in fact it was an s 15(1), s 16

Thanks for the information Kris and I will get back to you in due course.

Ken

From: Stewart, Robert A FIN:EX [<mailto:Bob.Stewart@gov.bc.ca>]
Sent: November-09-16 3:31 PM
To: Ackles, Kenneth <Kenneth.Ackles@cfseu.bc.ca>
Subject: FW: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Bob Stewart
Manager, Intelligence Unit
Lower Mainland Investigations
#408-4603 Kingsway Avenue
Burnaby, BC, V5H 4M4
Gaming Policy and Enforcement Branch
Office: 604-660-0271

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From: Stewart, Robert A FIN:EX
Sent: Wednesday, November 9, 2016 1:53 PM
To: 'Kris Gade'
Cc: Ackles, Ken FIN:EX
Subject: RE: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Hi Kris,

First off GPEB Investigator McDougall does not report to me so I will forward this e-mail to his Manager Ken Ackles.

Secondly, if you would like my personal opinion, s 15(1), s 16, s 22

Just my opinion without knowing the full details.

I will forward this e-mail to Ken Ackles.

Take care.

Bob Stewart

Manager, Intelligence Unit
Lower Mainland Investigations
#408-4603 Kingsway Avenue
Burnaby, BC, V5H 4M4
Gaming Policy and Enforcement Branch
Office: 604-660-0271

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From: Kris Gade [<mailto:KGade@BCLC.com>]
Sent: Wednesday, November 9, 2016 12:47 PM
To: Stewart, Robert A FIN:EX
Subject: GPEB Request For Information - Cascades Casino Langley - November 5, 2016

Afternoon Bob,

This email is in reference to an incident that occurred on Saturday, November 5, 2016 at approx. 1900hrs.
s 15(1), s 16, s 22

I look forward to your attention and clarification on this matter.

Cordial regards,

Kris Gade, CAMS
Manager, Investigations
Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver BC. V5M 0A6

T 604 228 3011 C s 17(1)

•Yes, and...•

kgade@bclc.com

bclc.com

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Kevin Simcoe

From:
Sent:
To:
Subject:

Ok. Thanks.

From: Ross Alderson
Sent: November-17-16 10:17 AM
To: Rob Kroeker
Subject: RE: Our First Delimited Cheque Went out...

Rob, my apologies for the alarm.
I will address this with my team to reinforce that I am provided the right information as this has created unnecessary escalation

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Ross Alderson
Sent: Thursday, November 17, 2016 9:55 AM
To: Rob Kroeker; Kevin Sweeney
Cc: Laird Robinson
Subject: RE: Our First Delimited Cheque Went out...
Importance: High

We can stand down. Seems like we jumped the gun.
This was an error by the site in the selection of type of cheque on Fintrac. This was actually a PGF cheque issued and not a convenience cheque. So there was no policy violation.
Fintrac entry has since been updated.

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Rob Kroeker
Sent: Thursday, November 17, 2016 9:50 AM
To: Ross Alderson; Kevin Sweeney
Subject: RE: Our First Delimited Cheque Went out...

What are doing in response.

Can you please give me the details and I will phone Terrance today.

From: Ross Alderson
Sent: November-17-16 9:28 AM
To: Rob Kroeker; Kevin Sweeney
Subject: FW: Our First Delimited Cheque Went out...

FYI

The good news is we had our first delimited ROF cheque.

The bad news is it was RRCR who have not received approval....seriously!?!

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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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.

From: Bal Bamra
Sent: Thursday, November 17, 2016 9:26 AM
To: Ross Alderson
Subject: RE: Our First Delimited Cheque Went out...

Hi Ross,

Spoke with Shauna. She is treating this a violation of policy and will be addressing the site.

They had a site meeting and it was clear that no one was to proceed without Terrance's sign off so someone jumped the gun down there.

Needless to say, this has been handled.

Thanks,

Bal Bamra B.Com, CAMS
Manager, AML Intelligence
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 228 3113 C s 17(1)

•Yes, and...•

bbamra@bcl.com

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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.

From: Ross Alderson
Sent: Thursday, November 17, 2016 8:59 AM
To: Bal Bamra
Subject: RE: Our First Delimited Cheque Went out...

Did GCGC have approval yet?

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bcl.com

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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.

From: Bal Bamra
Sent: Thursday, November 17, 2016 7:32 AM
To: Ross Alderson
Subject: Our First Delimited Cheque Went out...

s 22	s 22	s 22	River Rock (GCC)	11/15/2016 5:20:00 PM	Issued a cheque	Return of Funds- Convenience (PGF Account Holder)	\$59,500.00
------	------	------	---------------------	--------------------------	--------------------	---	-------------

Bal Bamra B.Com, CAMS
Manager, AML Intelligence
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2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

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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.

From: s 15(1)(l)

Sent: Thursday, November 17, 2016 7:00 AM

To: Brad Rudnicki; Cathy Cuglietta; Bal Bamra; Daryl Tottenham; Dan H. Thompson

Subject: Convenience Cheque Report was executed at 17/11/2016 7:00:15 AM

Kevin Simcoe

From:
Sent:
To:
Subject:

Yes, lots of material around I am sure we can work from. Don't put in any work till we have a chance chat.

From: Ross Alderson
Sent: November-17-16 2:04 PM
To: Rob Kroeker
Cc: Nicole Wu
Subject: RE: Board AML Training

Hi Rob, Yes you are correct, the last board training was 30 October 2014. I am definitely free the afternoon of the 5th I can easily put something together. Last time I did a PPT presentation and there is enough new material to keep it fresh

Ross Alderson CAMS.

Director, AML & Investigations
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•Yes, and...•

ralderson@bclc.com

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From: Rob Kroeker
Sent: Thursday, November 17, 2016 1:57 PM
To: Ross Alderson
Cc: Nicole Wu
Subject: Board AML Training

Hi

Board AML training is due this year – has been a while since you and I have discussed this and I don't recall exactly where we had left it. The last Board meeting of 2016 is now set and it is December 5 which means by default you and I are on the agenda. We are down for an hour the afternoon of the 5th and need to provide a Board level training session on AML requirements. How is your calendar that day?

Let's grab a few minutes after the STR meeting on Monday to plan out what we will do for this cycle.

Rob

Kevin Simcoe

From:
Sent:
To:
Subject: s 15(1)

Thanks Ross

Sent from my s 15(1)(l)
Original Message
From: Ross Alderson
Sent: Thursday, November 17, 2016 8:27 PM
To: Rob Kroeker
Cc: Kevin Sweeney
Subject: Fw: s 15(1)

Hi Rob,
Just an FYI
s 15(1)
Giulia from investigations will follow up tomorrow and obtain further information.
Regards

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)
Original Message
From: Ross Alderson <RAlderson@BCLC.com>
Sent: Thursday, November 17, 2016 8:06 PM
To: Kris Gade
Subject: Re: s 15(1)

Roger

Ross Alderson
Director AML & Investigations.
BCLC

Sent from s 15(1)(l)
Original Message
From: Kris Gade
Sent: Thursday, November 17, 2016 7:44 PM
To: Ross Alderson; Bruno Gatto; Giulia Fabbro
Subject: Re: s 15(1)

s 15(1)

s 15(1)

Unless we hear anything further tonight, we'll follow-up 1st thing in the morning...

Kris Gade, CAMS
Manager, Investigations
Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver BC. V5M 0A6

T 604 228 3011 C s 17(1)

●Yes, and...●

kgade@bclc.com

bclc.com

Original Message

From: Ross Alderson

Sent: Thursday, November 17, 2016 19:16

To: Kris Gade; Bruno Gatto; Giulia Fabbro

Subject: Re: s 15(1)

Copy

Ross Alderson
Director AML & Investigations.
BCLC

Sent from my s 15(1)(l)

Original Message

From: Kris Gade

Sent: Thursday, November 17, 2016 7:15 PM

To: Ross Alderson; Bruno Gatto; Giulia Fabbro

Subject: Fw: s 15(1)

FYI... I just spoke with s 22 who is following up accordingly... I'll update everyone if there is anything substantive to report...

Kris Gade, CAMS
Manager, Investigations
Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver BC. V5M 0A6

T 604 228 3011 C s 17(1)

●Yes, and...●

kgade@bclc.com

bclc.com

Original Message

From: s 15(1)(l)

Sent: Thursday, November 17, 2016 19:02

To: Cathy Cuglietta; Tom Plante; Stone Lee; Ross Alderson; Brian Stephens; Giulia Fabbro; Mike Hiller; Steve Beeksma; Daryl Tottenham; Bruno Gatto; Jim Husler; John Bressette; Kris Gade; Brandon Norgaard; Tom Caverly; John Ramsay; Craig Morphet; Andrew Brintnell; Lynn Cousins; Craig Longley; Paul Stanney; Joseph Depaulo; Mark Dickenson; Marcia Guizzo

Subject: s 15(1)

Incident regarding s 15(1)

Property: Villa Casino (GC)

Incident File s 15(1)

Date: Nov 17 2016 7:01:42 PM

Created by: s 15(1), s 19

File details: s 15(1), s 19, s 22

11/17/2016 7:01:45 PM

Modified by:

Kevin Simcoe

From:
Sent:
To:
Subject:

Ross – see below

Thoughts or comments?

R

From: Meilleur, Len FIN:EX [mailto:Len.Meilleur@gov.bc.ca]
Sent: November-22-16 9:49 AM
To: Rob Kroeker
Cc: Anna Fitzgerald; Ross Alderson; Halpenny, Barry FIN:EX; Knight, Chris W FIN:EX; Werner, Peter H FIN:EX
Subject: FOR RESPONSE - Proposed GPEB Section 86(1) Process by BCLC

Good morning Rob:

Sorry we didn't have much time to connect yesterday. As yet I haven't had a chance to read Mr. German's report.

I am writing you respecting the below noted email. Yesterday, prior to this email I believe, our legal counsel sent an email to your counsel (Jennifer) in advance of the January meeting.

With respect to Ross' request below I ask that this proposed process be s 13(1)

This will be a point of discussion at

the meeting.

With respect to 86(1) demands to BCLC we will, as agreed, continue to provide a file number and the type of offence we are investigating. Where there is insufficient information or urgency we will note that on the demand and provide once a file# is established.

s 13(1), s 14, s 15(1)

I understand Anna and Ross are working on the issue of bulk PDF information transfers on the new secure portal which^{s 13(1)}
s 13(1) I am sure they will find a solution to that
issue.

My request is that BCLC hold off on any further action or notices of change on Section 86 or other information requests until the meeting to establish a protocol is held in January 2017.

I would appreciate that and thanks

Len Meilleur
Compliance Division
GPEB

From: Ross Alderson [<mailto:RAlderson@BCLC.com>]
Sent: Monday, November 21, 2016 11:40 AM
To: Fitzgerald, Anna FIN:EX
Subject: Propsed GPEB S86(1) Process

Hi Anna,
s 15(1)

Regards

Ross

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

ralderson@bclc.com

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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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Kevin Simcoe

From:
Sent:
To:
Subject:

Thanks Ross. Great work as usual by the team.

From: Ross Alderson
Sent: November-23-16 2:45 PM
To: Rob Kroeker
Subject: FW: Counterfeit Bills in Casino - READ

UPDATE:
s 15(1)

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

ralderson@bclc.com

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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.

From: Ross Alderson
Sent: Wednesday, November 23, 2016 1:32 PM
To: Rob Kroeker
Subject: Counterfeit Bills in Casino - READ
Importance: High

Rob
s 15(1)

s 15(1)

From: Peter Wright
Sent: Wednesday, November 23, 2016 1:05 PM
To: Jerry Williamson
Cc: Laird Robinson; Bill Boyd; Joseph Depaulo; Kevin Sweeney
Subject: Update on Bill Acceptors to Address Counterfeiting

Hi Jerry,

Here is an update for you including original timelines related to the counterfeiting activity that has been seen in BC Casinos.
s 15(1)

End of report

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Hi Ross – have we heard anything further on the STR and LCT numbers?

From: Ross Alderson
Sent: November-02-16 12:48 PM
To: Kevin Sweeney; Jennifer Keim; Rob Kroeker
Subject: FW: FINTRAC FOI

Following up from a number of recent FOI requests to FINTRAC Cathy received the attached letter on October 20.

This letter does provide data on disclosures however not the STR data we requested. Prior to this request we recently asked for STR numbers based on a previous years FOI format however FINTRAC appear to be capturing data differently so that request had little value. We went back to FINTRAC with more specific parameters and this is the response below. Seems odd that our previous FOI requests were not required to go through a compliance officer. However not being a FOI expert I am not sure if this is inconsistent with expectations. I have asked Cathy to get a contact point at the Compliance office.
Ross

Good morning Cathy,

Just to follow up on our telephone conversation this morning regarding file s 15(1), s 16 as FINTRAC's Access to Information and Privacy Office will not release the stats you're seeing under the Access to Information Act but the information can be provided by our Compliance office directly to BCLC as a Reporting Entity, I will be providing your contact information to one our Compliance officers at FINTRAC. Our Compliance office will produce the stats you're seeking, and the Compliance Officer will provide the stats and your information to his or her contact at BCLC; the contact with then provide the information to you.

As I will not be providing the information you're looking for under the Access to Information Act, I will close the file.

Thanks again, and please don't hesitate to contact me if you have any questions or concerns,

Julia Orchowski

ATIP Advisor | Conseillère en AIPRP
atip-aiprp@fintrac-canafe.gc.ca
Telephone | Téléphone 613-947-1893
Financial Transactions and Reports Analysis Centre of Canada
Centre d'analyse des opérations et déclarations financières du Canada
234 Laurier Avenue West, Ottawa, ON K1P 1H7
234, avenue Laurier Ouest, Ottawa ON K1P 1H7
Facsimile | Télécopieur 613-943-7931
Government of Canada | Gouvernement du Canada

From: Ross Alderson
Sent: Wednesday, November 02, 2016 11:09 AM
To: Bal Bamra
Subject: FINTRAC FOI

Did we ever get anything back from Cathy's last FOI request to FINTRAC?

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

ralderson@bcl.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:
Attachments:

I think we meant to talk about this Monday, but has been a busy week.

Here is an outline for the Board Training. We need to get the presentation to Suzanne by Dec 2.

Would you mind taking a run at it and I'll assist as needed. As discussed I think it would be good for you to deliver the slide deck and I will support if or as needed.

Will stop by to discuss shortly.

R

Slides

- Framework governing money laundering in Canada
 - o Dealt with under Criminal Law
 - o Legislative jurisdiction belongs to the federal government
- Key times in evolution of AML laws in Canada
 - o Prior to 1989 it was not an offence in Canada to launder the proceeds of crime
 - o In 1989 the Criminal Code was amended to make the possession of proceeds of the crime and laundering offences.
 - o In 1991 Canada's first legislation dealing specifically with the proceeds of crime was enacted: Proceeds of Crime (money laundering) Act
 - o This Act introduced for the first time record keeping requirements in regard to cash transactions.
 - o In 2001 the Act was greatly modified and renamed the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)
- PCMLTFA - Primary Requirements
 - o Compliance Plan
 - o Record keeping in relation to specified transactions
 - o Reporting
 - o Know Your Customer/Customer Due Diligence (KYC/CDD)
- PCMLTFA – Compliance Plan
 - o What it must include
- PCMLTFA – Record keeping
 - o What records must be kept
- PCMLTFA – Reporting
 - o LCT
 - o STR
 - o CDR
 - o EFT
- PCMLTFA – KYC/CDD
 - o Basic requirements
- PCMLTFA – On-going Monitoring
 - o New in 2014
 - o What is required
 - o What we do (at a high level)
- PCMLTFA – FinTRAC
 - o Mandate and role
- PCMLTFA
 - o Offences & Penalties (criminal and administrative)
- Service Provider roles and responsibilities under the Compliance Plan
- Executive Responsibilities
- Board Responsibilities
 - o Employee safe Harbour
- Questions

Kevin Simcoe

From:
Sent:
To:
Subject: s 22

s 15(1)

From: Ross Alderson
Sent: November-30-16 9:38 AM
To: Rob Kroeker
Subject: FW: s 22 Interview Summary

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
T 604 225 6382 C s 17(1) F 604 225 6488

•Yes, and...•

ralderson@bclc.com

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From: Tom Caverly
Sent: Tuesday, November 29, 2016 9:06 AM
To: Ross Alderson; Kris Gade; Daryl Tottenham; Bruno Gatto
Subject: s 22

Good morning,

s 22

s 22 is now the subject of no unsourced cash conditions and has been added to the spreadsheet.

Tom Caverly

AML Investigations
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
C s 17(1)
TCaverly@bclc.com

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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.

Kevin Simcoe

From:
Sent:
To:
Subject:

Looking very good. Think you have just about all covered off. Couple of points:

Slide 6 – can we use “international” instead of transnational – just a personal nit around this bit of law enforcement jargon.
Slide 7 – you will need to speak to what a CAMLO is. Biannual should be Biennial (once every two years)

RK

From: Ross Alderson
Sent: November-30-16 2:58 PM
To: Rob Kroeker
Subject: 3 pm meeting

Incomplete draft for review

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6
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•Yes, and...•

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