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**VIA EMAIL**

April 14, 2020

[applicant information]

Dear

Re: Request for Records: BCLC File 20-021

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British Columbia Lottery Corporation (BCLC) writes further to your March 2, 2020 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter dated March 2, 2020.

You requested:

"...records that have already been disclosed in release 19-048...(that) relate to compliance issues...at (River Rock Casino)..."

BCLC is providing three pages of records in response to your request. Some information has been withheld from disclosure under sections 13, 15, 17 and 22 of FIPPA.

Below are the reasons for withholding information under each of the exceptions to disclosure noted.

**Section 13 (policy advice or recommendations)**

The information withheld under this section constitutes advice or recommendations by BCLC employees and others to BCLC decision-makers.

**Section 15 (harm to law enforcement)**

The information withheld under this section is harmful to law enforcement because it would reveal anti-money laundering control processes. If disclosed, the information would be useful to those seeking to evade detection for committing money laundering offences.

**Section 17 (harm to the financial or economic interests of BCLC)**

The information withheld under this section is harmful to BCLC's financial or economic interests because some information in the records, if disclosed, would reveal BCLC's core business functions and other business matters, which would be harmful to the financial or economic interests of BCLC.

**Section 22 (harm to personal privacy)**

The information withheld under this section consists of the cell phone number of a third party. Disclosure of this information would amount to an unreasonable invasion of the personal privacy of that individual.

The full text of sections 13, 15, 17 and 22 can be found at:  
[http://www.bclaws.ca/Recon/document/ID/freeside/96165\\_00](http://www.bclaws.ca/Recon/document/ID/freeside/96165_00)

These records will be published a minimum of five business days after release at:  
<https://corporate.bcl.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me at [ksimcoe@bcl.com](mailto:ksimcoe@bcl.com), via mail or at (250) 852-5228.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia  
P.O. Box 9038, Station Provincial Government  
Victoria, BC V8W 9A4

T (250) 387-5629 F (250) 387-1696  
Email [info@oipc.bc.ca](mailto:info@oipc.bc.ca) Online [www.oipc.bc.ca](http://www.oipc.bc.ca)

Sincerely,  
[original signed by]

Kevin Simcoe  
Senior Freedom of Information Analyst

Enclosure

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**From:** Ross Alderson  
**Sent:** February-03-12 11:35 AM  
**To:** John Karlovcec; Rick Pannu; Steve Beeksma  
**Cc:** Gordon Friesen  
**Subject:** RE: \$100 Bills at the River Rock

Thanks John,

As you are aware we ourselves have discussed this issue here with management a number of times including the \$50K threshold for \$20 bills. s 15(1)(c)(k)(l)

We have pointed out the AML training (which they have all taken) does not specify s 15(1)(c)(k)(l)

I hope if/when Fintrac do an audit that response satisfies them under the "risk management" strategies we have in place. I have my doubts whether it would, especially considering the scenarios found in our AML on line training and the fact that other sites are reporting a lot less amounts.

Anyway we will wait to see what Pat comes up with.

On a positive note we are receiving the daily cage sheet each morning which contains s 15(1)(c)(k)(l)

Cheers

## Ross ALDERSON

Casino Security & Surveillance Investigator  
Corporate Security & Compliance, BCLC  
2940 Virtual Way, Vancouver, BC, CANADA  
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**From:** John Karlovcec  
**Sent:** February 3, 2012 11:19 AM  
**To:** Rick Pannu; Ross Alderson; Steve Beeksma  
**Cc:** Gordon Friesen  
**Subject:** FW: \$100 Bills at the River Rock

Gents,

Simply FYI. I have told Derek that I haven't heard the fact that RRRCR surveillance does not consider any buy-in with \$100 bills as being suspicious, and they are too busy to do this.

I have directed the below noted comments from Derek Dickson to Pat Ennis for his feedback. As we know we do take s 15(1)(c)(k)(l)

The site should be taking into consideration the totality of the circumstances s 15(1)(c)(k)(l)

s 15(1)(c)(k)(l)  
create an incident file and we will follow up with it.

When in doubt they should

Really these indicators s 15(1)(c)(k)(l) and help us to s 15(1)(c)(k)(l)

I've asked Pat Ennis to clarify this with his staff. To simply say that Patron Y s 15(1)(c)(k)(l)  
on the Service Provider's part. s 15(1)(c)(k)(l)

We understand that the site is busy and there may be some incidents that go undetected but s 15(1)(c)(k)(l)

Thanks,

John

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**From:** Dickson, Derek SG:EX [<mailto:Derek.Dickson@gov.bc.ca>]  
**Sent:** February 3, 2012 8:09 AM  
**To:** John Karlovcec  
**Subject:** \$100 Bills at the River Rock

Good morning John,  
We are starting to see a trend developing where the RRCR is not submitting 86 reports regarding suspicious cash buy-ins where \$100 bills are presented. On at least one occasion recently the BCLC investigators discovered that a patron had left the RRCR several times and returned shortly thereafter with large amount of cash in \$100 denomination. The total was approximately \$5000,000 and RRCR was directed to forward an 86.

s 13(1), s 15(1)(c)(k)(l), s 17(1)

Have you heard this and is this RRCR's unofficial policy regarding \$100 bills?

s 13(1), s 15(1)(c)(k)(l)

You certainly know more about Fintrac reporting than I do, but I think I am safe in saying that there is s 15(1)(c)(k)(l)

Your thoughts?

Thanks,

Derek Dickson  
Director, Casino Investigations LMD  
Investigations and Regional Operations  
Gaming Policy and Enforcement Branch  
Ministry of Public Safety and Solicitor General

This message is confidential and is intended only for the individual named. It may contain privileged information. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Any unauthorized disclosure is strictly prohibited. If you receive this e-mail in error, please notify the sender immediately and delete this e-mail from your system.

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**From:** Ross Alderson  
**Sent:** September-23-11 12:36 PM  
**To:** John Karlovcec; Gordon Friesen  
**Cc:** Steve Beeksma  
**Subject:** Under \$50K buy ins in \$20 bills

FYI,

We have had some recent files where we have patrons buy in for \$49,960.00 and \$49,980 in \$20's and we have found out through further investigation.

s 15(1)(c)(k)(l)

s 15(1)(c)(k)(l)

Steve is looking at the STR's we have done recently to get some ITRAK file numbers.

s 13(1), s 15(1)(c)(k)(l), s 17(1)

s 15(1)(c)(k)(l) but if you look at the AML training s 15(1)(c)(k)(l) I am  
concerned that the outside auditor will find us noncompliant.

Cheers

**Ross ALDERSON**

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