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Kamloops, BC V2C 1E2

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F 250 828 5631

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604 270 0649
www.bclc.com

VIA EMAIL

May 4, 2021

[applicant information]

Re: Request for Records: BCLC File 21-010

British Columbia Lottery Corporation (BCLC) writes further to your April 6, 2021 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter of same date.

You requested:

"Any and all records regarding a press release on anti-money laundering initiatives, including communications with officials from the Attorney General's office (January 1-February 10, 2018)"

Some of the information you have requested is publicly available at the following links:

- <https://news.gov.bc.ca/releases/2018AG0005-000231>
- <https://corporate.bclc.com/articles/our-business/2018/bclc-expands-source-of-funds-procedures-in-b-c-gambling-facilit.html>

BCLC is providing 68 pages of records in response to your request. Some of the information has been withheld from disclosure under sections 13, 14 15 and 17 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 and recommendations by BCLC employees and others to BCLC decision makers.

Section 14 (legal advice)

The information withheld under this section consists of legal advice that has been sought and provided to BCLC.

Section 15 (harm to law enforcement)

The information withheld under this section could harm the security of a system, including BCLC's computer and communication systems, under section 15(1)(l) of FIPPA.

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 disclosure would reveal the private cell phone numbers of several BCLC employees, which could necessitate changing the numbers with an associated cost to BCLC.

The full text of sections 13, 14, 15 and 17 can be found at:
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 CPenkert@bcl.com or at (250) 852-5370.

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 Online www.oipc.bc.ca

Sincerely,
[original signed by]

Christian Penkert
Senior Freedom of Information Analyst

Enclosure

From: [Laura Piva-Babcock](#)
To: [Jim D. Lightbody](#); [Susan Dolinski](#); [Brad Desmarais](#); [Rob Kroeker](#); [Jennifer Keim](#); [Kevin Sweeney](#); [Garth Pieper](#); [John Karlovcec](#); [Kevin Gass](#); [Amanda Hobson](#); [Monica Bohm](#); [Pat Davis](#); [Jamie Wiebe](#)
Cc: [Lara Gerrits](#)
Subject: Final Information Bulletin - German Recommendation
Date: January-10-18 10:58:48 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.docx](#)
[KM and QA_German_Rec_SOF_Directive_final_10_Jan_2018.docx](#)

Hi,

We have made some changes to the versions. Here are the updated final documents. Information bulletin is being distributed to media shortly. QA is for internal use.

Please delete the previous versions.

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

From: Laura Piva-Babcock
Sent: January-10-18 9:31 AM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Jennifer Keim <JKeim@BCLC.com>; Kevin Sweeney <KSweeney@BCLC.com>; Garth Pieper <GPieper@BCLC.com>; John Karlovcec <JKarlovcec@bclc.com>; Kevin Gass <KGass@BCLC.com>; Amanda Hobson <AHobson@bclc.com>; Monica Bohm <MBohm@BCLC.com>; Pat Davis <PDavis@BCLC.com>; Jamie Wiebe <JWiebe@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: Final Information Bulletin - German Recommendation

Hi,

Today at 10 a.m. we will be distributing the attached information bulletin to BC media regarding the implementation of Peter German's interim recommendation #1.

I have also attached the QA that is for internal use and development of media messaging. Thanks to those who helped finalize these documents.

Regards,

Laura Piva-Babcock

Director, Communications

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

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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](#)
To: [Jim D. Lightbody](#)
Subject: RE: \$25,000 Cap
Date: January-16-18 7:40:00 AM

Conferred with the team this morning, we can give you the risk breakdown over \$25K and under - likely by end of day today. The over will be fairly detailed - number of players, and we will be able to say for certain all are high risk or very high risk. Under will be less detailed because of that very large number of players. We will make a more general statement there such as the typical risk profile is low risk.

Another rationale for \$25K that I was reminded of in considering the issue is this - generally we do much higher level of customer due diligence starting around \$20K-\$30K because this is a reasonable number for persons of high wealth to draw out from their ATM or Global cash. We have consulted with FinTRAC in the past on this point and they have verbally agreed with this approach. They have said it is reasonable within the risk framework (although we recognize now the direction from government/german is to move to a prescriptive model).

-----Original Message-----

From: Jim D. Lightbody
Sent: January-15-18 5:06 PM
To: Rob Kroeker <RKroeker@bcl.com>
Subject: FW: \$25,000 Cap

Rob;
FYI. I'll let you know what he says. Setting up the call for Wed or Thu.
Jim

-----Original Message-----

From: Fyfe, Richard J JAG:EX [<mailto:Richard.Fyfe@gov.bc.ca>]
Sent: Monday, January 15, 2018 4:02 PM
To: Jim D. Lightbody <JDLightbody@bcl.com>
Cc: Richter, Connie JAG:EX <Connie.Richter@gov.bc.ca>
Subject: \$25,000 Cap

s 14

Richard J.M. Fyfe QC
Deputy Attorney General
Ministry of Attorney General
Tel. (250) 356-0149

This communication (both the message and any attachments) is confidential and may be protected by solicitor-client privilege. It is intended only for the use of the person or persons to whom it is addressed. Any distribution, copying or other use by anyone else is strictly prohibited. If you have received this communication in error, please destroy the email message and any attachments immediately and notify me by telephone or by email.

From: [Rob Kroeker](#)
To: [Susan Dolinski](#)
Subject: RE: AML initiatives - GPEB
Date: January-17-18 4:00:00 PM

You mean you want to do a comm plan around my standing meetings with Anna?

From: Susan Dolinski
Sent: January-17-18 3:52 PM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>
Cc: Brad Desmarais <BDesmarais@bclc.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE: AML initiatives - GPEB

Hi Rob,

I think it would be beneficial to have our communications plan ready to go to support these discussions, should it come up. When do you expect to have the document available that can use as a basis for this work? Laura has also requested that a meeting occur with casino/security/comms to ensure we are all aligned on plan and timing. Let us know if you will set this up or if you'd like Laura to.

Thank you,

Susan

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC

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T 604-228-3096 F 604-225-6422 C s 17(1)

sdolinski@bclc.com

bclc.com

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

From: Rob Kroeker
Sent: Wednesday, January 17, 2018 3:43 PM
To: Jim D. Lightbody <JDLightbody@bclc.com>
Cc: Brad Desmarais <BDesmarais@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>
Subject: RE: AML initiatives - GPEB

Hi Jim

Will set up a meeting with Anna and Michele.

Recall, I have already run the concept of a cash cap past German. Once we have a fleshed out document we will provide that to German as well, but will wait on results of your call before we do anything. We posted the MSB document to the German secure server yesterday.

Rob

From: Jim D. Lightbody
Sent: January-17-18 3:35 PM
To: Rob Kroeker <RKroeker@bclc.com>
Cc: Brad Desmarais <BDesmarais@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>
Subject: AML initiatives - GPEB
Importance: High

Rob;

I spoke with John Mazure today advising and updating him on some of the things we're working on in AML. We had agreed to stay in close contact on this so we're aligned.

I advised him of our decision on de-risking MSB's and also about our thinking behind a cap on cash at \$25K. I gave him the rationale and asked how they would see this working, so we're clear, given the discussions we had around Peter German's reco #1. He stated he didn't think they need to approve it, but would appreciate the opportunity to review and ask questions. We also agreed it would be wise to advise Peter German. I did state that we would like this to move rather quickly so it's in place prior to Chinese New year, and he said they would work with that. He also stated that while he prefers a risk based approach, we are in a risk averse environment now and a more prescriptive approach may be necessary.

The next steps we agreed to were for John K and yourself to meet with Anna and Michele to take them through both those initiatives and rationale. It would help if you could send them a brief document in advance, or after, that summarizes our rationale and how it works.

I will also advise you tomorrow the result of my call with the Deputy and the MA later today. Let me know if you have any questions.

He also stated that his team (Bob Stewart and Anna) have appreciated the cooperation from BCLC and SP's in developing the implementation plan around reco #2. They haven't come to any conclusions yet.

Thanks,
Jim

Jim Lightbody
President & CEO

BCLC Head Office
74 West Seymour Street, Kamloops BC V2C 1E2
T 250 828 5650

BCLC Marketing & Sales Office
2940 Virtual Way, Vancouver BC V5M 0A6
T 604 225 6400

jdlightbody@bclc.com

bclc.com

From: [Rob Kroeker](#)
To: [Jim D. Lightbody](#); [Susan Dolinski](#)
Cc: [Brad Desmarais](#); [Jamie Callahan](#); [Shirley Beveridge](#); [Laura Piva-Babcock](#)
Subject: RE: AML initiatives - GPEB
Date: January-17-18 4:05:00 PM

Anna and I have a standing meeting where we update on items such as these. Conveniently our next one is this coming Tuesday. What I have already proposed to Anna is that we include Michele and John for the part of our meeting that will deal with the limit and MSB derisking. We wouldn't start preparing anything until after Jim's call in case there is a change in direction. Will most likely be Friday or Monday before we have something written up for their consumption.

From: Jim D. Lightbody
Sent: January-17-18 3:55 PM
To: Susan Dolinski <SDolinski@BCLC.com>; Rob Kroeker <RKroeker@bclc.com>
Cc: Brad Desmarais <BDesmarais@bclc.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE: AML initiatives - GPEB

Good idea, Susan

From: Susan Dolinski
Sent: Wednesday, January 17, 2018 3:52 PM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>
Cc: Brad Desmarais <BDesmarais@bclc.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE: AML initiatives - GPEB

Hi Rob,

I think it would be beneficial to have our communications plan ready to go to support these discussions, should it come up. When do you expect to have the document available that can use as a basis for this work? Laura has also requested that a meeting occur with casino/security/comms to ensure we are all aligned on plan and timing. Let us know if you will set this up or if you'd like Laura to.

Thank you,

Susan

Susan Dolinski
Vice President, Social Responsibility & Communications

BCLC

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sdolinski@bclc.com

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

From: Rob Kroeker

Sent: Wednesday, January 17, 2018 3:43 PM

To: Jim D. Lightbody <JDLightbody@bclc.com>

Cc: Brad Desmarais <BDesmarais@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>

Subject: RE: AML initiatives - GPEB

Hi Jim

Will set up a meeting with Anna and Michele.

Recall, I have already run the concept of a cash cap past German. Once we have a fleshed out document we will provide that to German as well, but will wait on results of your call before we do anything. We posted the MSB document to the German secure server yesterday.

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From: Jim D. Lightbody

Sent: January-17-18 3:35 PM

To: Rob Kroeker <RKroeker@bclc.com>

Cc: Brad Desmarais <BDesmarais@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>

Subject: AML initiatives - GPEB

Importance: High

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He also stated that his team (Bob Stewart and Anna) have appreciated the cooperation from BCLC and SP's in developing the implementation plan around reco #2. They haven't come to any conclusions yet.

Thanks,

Jim

Jim Lightbody

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BCLC Head Office

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2940 Virtual Way, Vancouver BC V5M 0A6

T 604 225 6400

jdlightbody@bclc.com

bclc.com

From: [Rob Kroeker](#)
To: [Susan Dolinski](#)
Subject: RE: AML initiatives - GPEB
Date: January-17-18 4:06:00 PM

ok

From: Susan Dolinski
Sent: January-17-18 4:02 PM
To: Rob Kroeker <RKroeker@bclc.com>
Subject: RE: AML initiatives - GPEB

Hi Rob,
The communications plan is for the policy change.

Thanks,

Susan

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC

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Cc: Brad Desmarais <BDesmarais@bclc.com>; Jamie Callahan <JCallahan@bclc.com>; Shirley Beveridge <SBeveridge@BCLC.com>; Laura Piva-Babcock <LPiva-Babcock@bclc.com>
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bclc.com

From: [Rob Kroeker](#)
To: [Laura Piva-Babcock](#)
Subject: RE: Final Information Bulletin - German Recommendation
Date: January-10-18 9:37:00 AM
Attachments: [IB_BCLC_German_Rec_Complete_draft_5_Jan_2018_\(LCS_edits\).docx](#)

Here is what we provided yesterday. To say we are s 13

From: Laura Piva-Babcock
Sent: January-10-18 9:35 AM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

That is strange. Let me check. L

From: Rob Kroeker
Sent: January-10-18 9:34 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

Laura – the IB does not incorporate the corrections LCS provided yesterday.

From: Laura Piva-Babcock
Sent: January-10-18 9:31 AM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Jennifer Keim <JKeim@BCLC.com>; Kevin Sweeney <KSweeney@BCLC.com>; Garth Pieper <GPieper@BCLC.com>; John Karlovcec <JKarlovcec@bclc.com>; Kevin Gass <KGass@BCLC.com>; Amanda Hobson <AHobson@bclc.com>; Monica Bohm <MBohm@BCLC.com>; Pat Davis <PDavis@BCLC.com>; Jamie Wiebe <JWiebe@bclc.com>
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From: [Rob Kroeker](#)
To: [Laura Piva-Babcock](#)
Subject: RE: Final Information Bulletin - German Recommendation
Date: January-10-18 9:41:00 AM

PS – the Q&A has the same “expand” language

From: Rob Kroeker
Sent: January-10-18 9:40 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

Thanks.

From: Laura Piva-Babcock
Sent: January-10-18 9:38 AM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

It seems GCPE sent back the wrong version. We'll clear it up and re-send to the distribution list below. L

From: Rob Kroeker
Sent: January-10-18 9:34 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
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From: [Rob Kroeker](#)
To: [Laura Piva-Babcock](#)
Cc: [Susan Dolinski](#)
Subject: RE: Final Information Bulletin - German Recommendation
Date: January-10-18 10:13:00 AM

Looks fine, thanks.

From: Laura Piva-Babcock
Sent: January-10-18 10:09 AM
To: Rob Kroeker <RKroeker@bclc.com>
Cc: Susan Dolinski <SDolinski@BCLC.com>
Subject: RE: Final Information Bulletin - German Recommendation

Hi Rob,

Unfortunately, I don't have time to further explain that you had left something in your LCS changes that perhaps you had intended not to.

I now have the correct final and have changed the sentence in paragraph 5 (highlighted) to correspond with what you are concerned about. Please take a look asap. Thanks. Laura

From: Rob Kroeker
Sent: January-10-18 10:00 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Cc: Susan Dolinski <SDolinski@BCLC.com>
Subject: RE: Final Information Bulletin - German Recommendation

Hi – not following your question. The issue is **s 13**

. What we are doing is extending the source of funds inquiries to all of transactions now whereas we used to do it depending upon the risk circumstances.

Hope that helps

From: Laura Piva-Babcock
Sent: January-10-18 9:51 AM
To: Rob Kroeker <RKroeker@bclc.com>
Cc: Susan Dolinski <SDolinski@BCLC.com>
Subject: RE: Final Information Bulletin - German Recommendation

Hi Rob,

Just looking at your edits again and your comment below. I have bolded a section in paragraph 5 that you had left in. Should we also remove that reference based on your comments? L

From: Rob Kroeker
Sent: January-10-18 9:38 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

Here is what we provided yesterday. To say s 13

From: Laura Piva-Babcock
Sent: January-10-18 9:35 AM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

That is strange. Let me check. L

From: Rob Kroeker
Sent: January-10-18 9:34 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation

Laura – the IB does not incorporate the corrections LCS provided yesterday.

From: Laura Piva-Babcock
Sent: January-10-18 9:31 AM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Jennifer Keim <JKeim@BCLC.com>; Kevin Sweeney <KSweeney@BCLC.com>; Garth Pieper <GPieper@BCLC.com>; John Karlovcec <JKarlovcec@bclc.com>; Kevin Gass <KGass@BCLC.com>; Amanda Hobson <AHobson@bclc.com>; Monica Bohm <MBohm@BCLC.com>; Pat Davis <PDavis@BCLC.com>; Jamie Wiebe <JWiebe@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: Final Information Bulletin - German Recommendation

Hi,

Today at 10 a.m. we will be distributing the attached information bulletin to BC media regarding the implementation of Peter German's interim recommendation #1.

I have also attached the QA that is for internal use and development of media messaging. Thanks to

those who helped finalize these documents.

Regards,

Laura Piva-Babcock

Director, Communications

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

T 250 828 5576 Cs 17(1)

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

From: [Lara Gerrits](#)
To: [Sarah Darcey](#)
Subject: bclc.com
Date: January-09-18 2:51:53 PM

Head's up, can you please help us post an Info Bulletin to BCLC.com tomorrow morning for 10 a.m.? I don't have a final version yet but ... coming soon.

Thanks,

Lara

Lara Gerrits

Manager, Media & Issues Management (Interim)
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6

T 604 228 3066 C s 17(1)

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

From: [Sarah Morris](#)
To: [Gina Morin](#); [Tamara Morgan](#); [CommsMediaPA](#); [Danielle Boak](#); [Jennie Mundy](#); [Jennifer Watson](#); [Kristin Tilbury](#); [Pam Mudhar](#); [Tiana Roy](#)
Cc: [BCLC Media Relations](#)
Subject: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Date: January-10-18 11:10:28 AM
Attachments: [KM and OA German Rec SOF Directive final 10 Jan 2018.docx](#)
[IB_BCLC German Rec Complete final 10 Jan 2018.pdf](#)

Good morning,

Please find attached an information bulletin and Q&A document regarding today's announcement that BCLC has completed Peter German's interim recommendation to strengthen Source of Funds reporting.

Please share with appropriate staff and contact the media relations team if you receive any queries from media.

Thanks!

Sarah

Sarah Morris

Communications Officer, Media and Issues Management

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

T 604 228 3097 C s 17(1)

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

From: [Lara Gerrits](#)
To: "[Nelson, Tiffany GCPE:EX](#)"; "[Harris, Megan A GCPE:EX](#)"
Cc: [Laura Piva-Babcock](#); [Sarah Morris](#); [Angela Law](#)
Subject: BCLC Information Bulletin - German recommendation
Date: January-09-18 3:37:16 PM
Attachments: [IB_BCLC_German_Rec_Complete_final_5_Jan_2018.docx](#)

Hi Tiffany and Megan,

Attached is our final Information Bulletin re: implementation of German's recommendation to BCLC. Megan, I know that you and Laura initially discussed this getting posted to bclc.com tomorrow at 10 a.m.

Given that signage is already in place in facilities advising customers of procedures going into effect tomorrow, we would like to proactively distribute this Information Bulletin to media in order to be as transparent as possible. We would like to do this at 10 a.m.

Please advise of any concerns. I know we haven't been able to connect via phone, but feel free to give me a call if that's easier.

Cheers,

Lara

Lara Gerrits

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

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

From: [Lara Gerrits](#)
To: [Laura Piva-Babcock](#)
Subject: final German materials
Date: January-10-18 9:15:48 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.docx](#)
[KM_and_OA_German_Rec_SOF_Directive_final_10_Jan_2018.docx](#)
Importance: High

Lara Gerrits

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

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

From: [Laura Piva-Babcock](#)
To: [Jim D. Lightbody](#); [Susan Dolinski](#); [Brad Desmarais](#); [Rob Kroeker](#); [Jennifer Keim](#); [Kevin Sweeney](#); [Garth Pieper](#); [John Karlovcec](#); [Kevin Gass](#); [Amanda Hobson](#); [Monica Bohm](#); [Pat Davis](#); [Jamie Wiebe](#)
Cc: [Lara Gerrits](#)
Subject: Final Information Bulletin - German Recommendation
Date: January-10-18 10:58:48 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.docx](#)
[KM and QA_German_Rec_SOF_Directive_final_10_Jan_2018.docx](#)

Hi,

We have made some changes to the versions. Here are the updated final documents. Information bulletin is being distributed to media shortly. QA is for internal use.

Please delete the previous versions.

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

From: Laura Piva-Babcock

Sent: January-10-18 9:31 AM

To: Jim D. Lightbody ; Susan Dolinski ; Brad Desmarais ; Rob Kroeker ; Jennifer Keim ; Kevin Sweeney ; Garth Pieper ; John Karlovcec ; Kevin Gass ; Amanda Hobson ; Monica Bohm ; Pat Davis ; Jamie Wiebe

Cc: Lara Gerrits

Subject: Final Information Bulletin - German Recommendation

Hi,

Today at 10 a.m. we will be distributing the attached information bulletin to BC media regarding the implementation of Peter German's interim recommendation #1.

I have also attached the QA that is for internal use and development of media messaging. Thanks to those who helped finalize these documents.

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

From: [Lara Gerrits](#)
To: [Jim D. Lightbody](#); [Rob Kroeker](#); [Brad Desmarais](#)
Cc: [Susan Dolinski](#); [Laura Piva-Babcock](#); [John Karlovcec](#)
Subject: For review - revised German communications materials
Date: January-09-18 2:06:49 PM
Attachments: [KM and QA German Rec SOF Directive_draft_9 Jan 2018.docx](#)
[IB BCLC German Rec Complete_draft_5 Jan 2018.docx](#)
Importance: High

Hello,

We have made a few adjustments to the Info Bulletin that you previously reviewed regarding implementation of the German recommendation. The revision is intended to provide more detail, and align with messaging on signage in place at facilities. Please see attached draft IB – changes are highlighted in yellow for your ease of review.

In addition, we have pulled together a brief Q&A to support BCLC and SP staff in responding to questions about the expanded procedures. Please review and provide any feedback.

We would like to finalize both of these documents ASAP and plan to post the Info Bulletin tomorrow at 10 a.m.

Please let me know if you have any questions/concerns.

Thanks so much,

Lara

Lara Gerrits

Manager, Media & Issues Management (Interim)
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6

T 604 228 3066 C s 17(1)

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

From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#)
Cc: [Lara Gerrits](#)
Subject: FOR SIGN OFF: IB_BCLC German Rec Complete_draft_5 Jan 2018
Date: January-05-18 8:55:16 AM
Attachments: [IB_BCLC German Rec Complete_draft_5 Jan 2018.docx](#)

Hi Laura,
IB attached and ready for your review/sign off.
Cheers.
Sarah

From: [Laura Piva-Babcock](#)
To: [Lara Gerrits](#)
Subject: FW: IB German - distribution
Date: January-09-18 1:04:00 PM

Isn't that detail in there?

From: Susan Dolinski
Sent: January-09-18 1:03 PM
To: Laura Piva-Babcock

Cc: Lara Gerrits

Subject: RE: IB German - distribution

That level of detail isn't in the IB? I think we should push this out as news... why hide it. We should update the IB with the specifics though – what is currently required and what will be required in addition, effective tomorrow.

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC

2940 Virtual Way, Vancouver BC V5M 0A6

T 604-228-3096 **F** 604-225-6422 **C s** 17(1)

sdolinski@bclc.com

bclc.com

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

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 12:57 PM
To: Susan Dolinski <SDolinski@BCLC.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: RE: IB German - distribution

From: Susan Dolinski
Sent: January-09-18 12:56 PM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: RE: IB German - distribution

What do the signs look like?

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC

2940 Virtual Way, Vancouver BC V5M 0A6

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sdolinski@bclc.com

bclc.com

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

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 12:50 PM
To: Susan Dolinski <SDolinski@BCLC.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: IB German - distribution

Hi Susan,

Lara and I have been discussing the German IB. I had said we would just post it to our website. However, that's before I knew there was widespread signage in all casinos already up this week announcing the new rules. I am also waiting to hear whether the BCGIA is distributing a statement tomorrow (Peter is just asking his group).

For BCLC we are not recommending s 13

. My recommendation is:

s 13

. Let me know if

you're good with this or if there have been other conversations today.

Thanks,

Laura Piva-Babcock

Director, Communications

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

T 250 828 5576 C s 13

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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: [Cooper, Sam](#)
To: [BCLC Media Relations](#)
Subject: FW: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Date: January-10-18 11:22:45 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.pdf](#)
[CF822A4F-411B-45FB-9DB7-4C0CDB6430CCf69f.png](#)

Hello, I have a question regarding the implementation of these source of funds recommendations, this comes from our chief editor.

Does BCLC AML unit and large GSP's such as River Rock have the staff in place to actually conduct the checks required and the customer declarations, in order to reject any non-compliant or suspicious buy-in attempts on site, immediately?

Or, does more hiring need to be done in order to staff up and actually enforce these new rules? Staffing could involve BCLC staff, GPEB monitors, or GSP staff.

Secondly, as Section 86 reports show, a number of banned patrons frequently make attempts to enter casinos, and sometimes aggressively react to security staff requests that they leave. Is there a concern, that when patrons have buy ins rejected, they could become aggressive and threatening?

Thanks, please respond by 3 pm

From: "Munro, Harold" <HMunro@postmedia.com>
Date: Wednesday, January 10, 2018 at 11:13 AM
To: Postmedia Inc <scooper@postmedia.com>
Subject: FW: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

HAROLD MUNRO
EDITOR-IN-CHIEF
Vancouver Sun |The Province
T 604.605.2185
Cs 17(1)
#400 – 2985 Virtual Way
Vancouver, BC V5M 4X7



The information contained in this email is strictly confidential, and is only intended for the party(ies) to whom it is addressed. Any other use, dissemination, distribution, disclosure or copying is prohibited. If you have received this email in error please so advise by reply email. Thank you.

From: BCLC Media Relations <MediaRelations@bclc.com>
Date: Wednesday, January 10, 2018 at 11:10 AM
Cc: BCLC Media Relations <MediaRelations@bclc.com>
Subject: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Vancouver, B.C., January 10, 2018 – BCLC has implemented the first of Peter German’s interim recommendations, through new procedures requiring Service Providers to gather detailed information on the source of player funds for all transactions of \$10,000 or more.

Effective today, all cash and bank draft / certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. This information will be required before a customer is allowed to buy in and will be reviewed daily by BCLC’s AML unit.

The casino Service Providers’ registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received a source of funds declaration directly from the customer, and completely and accurately recorded that information. In addition, the customer will be required to sign the source of funds declaration form.

If a customer does not provide the required information, provides information that is clearly suspicious or refuses to sign the source of funds declaration, Service Providers must refuse the transaction, document the refusal, and notify BCLC, which will trigger an investigation.

BCLC has always required Service Providers to obtain and record detailed identification information on all customers who buy-in with cash of \$10,000 or more. In addition, source of funds information was required in many other circumstances. The expanded source of funds procedures are in direct response to Peter German’s December 5, 2017 [interim recommendation](#), prior to delivering his full report on anti-money laundering in Lower Mainland casinos to B.C.’s Attorney General by March 31, 2018:

“Service Providers must complete a Source of Funds Declaration for cash deposits or monetary instruments of \$10,000 or more. At a minimum, the declaration must outline a customer’s identification and provide the source of their funds, including the financial institution and account from which the cash or instrument was sourced. After two consecutive transactions, cash can only be accepted from the customer once it has been determined that it is not of a suspicious or illegal nature.”

BCLC will support GPEB as requested and needed with respect to German’s second interim recommendation wherein GPEB investigators should be present in high-volume casinos in the Lower Mainland on a 24/7 basis.

-30-

For more information:

BCLC Media Relations

604-225-6460

mediarelations@bclc.com

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From: [Lara Gerrits](#)
To: [Laura Piva-Babcock](#)
Subject: FW: updated German materials
Date: January-09-18 1:54:29 PM

I will send to Jim / Rob / Brad.

From: Susan Dolinski
Sent: January-09-18 1:54 PM
To: Lara Gerrits
Cc: Laura Piva-Babcock
Subject: RE: updated German materials
Much better. Thanks. I am fine with keeping this as IB if it throws things off... just let me know how it goes.

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC
2940 Virtual Way, Vancouver BC V5M 0A6
T 604-228-3096 F 604-225-6422 C s 17(1)
sdolinski@bclc.com
bclc.com

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

From: Lara Gerrits
Sent: Tuesday, January 09, 2018 1:50 PM
To: Susan Dolinski <SDolinski@BCLC.com>
Cc: Laura Piva-Babcock <L.Piva-Babcock@bclc.com>
Subject: updated German materials
Importance: High

Hi Susan,

I have a message in to Megan re: communications plans for tomorrow. In the meantime, we have added some more detail into the IB. Please see attached (updates are highlighted in yellow). I have mirrored this detail in the Q&A – also attached.

If you are good with the IB, I would like to re-distribute to Jim, Brad and Rob so they are aware of changes from what they had previously seen. As we would like to share the final Q&A with the BCGIA, CSC, etc., it may be good for Jim/Brad/Rob to review that as well at the same time.

Let me know if you have any questions/concerns.

Thanks,

Lara

Lara Gerrits

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

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

From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#)
Cc: [Lara Gerrits](#)
Subject: German Rec 1 materials
Date: January-05-18 12:02:30 PM
Attachments: [IN_BCLC_Implementation_of_German_Interim_Rec_draft_5_Jan_2018.docx](#)
[IB_BCLC_German_Rec_Complete_draft_5_Jan_2018.docx](#)

Hi Laura,
Cleaned up, consistent and ready for you to send up.

Cheers,

Sarah

Sarah Morris

Communications Officer, Media and Issues Management
BCLC, 2940 Virtual Way, Vancouver B.C., V5M 0A6
T 604 228 3097 **C s 17(1)**

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

From: [Lara Gerrits](#)
To: [Sarah Darcey](#); [Sarah Morris](#); [Angela Law](#)
Cc: [Laura Piva-Babcock](#); [Doug Cheng](#)
Subject: German recommendation - this morning
Date: January-10-18 10:31:24 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.pdf](#)
[IB_BCLC_German_Rec_Complete_final_10_Jan_2018.docx](#)
[KM_and_QA_German_Rec_SOF_Directive_final_10_Jan_2018.docx](#)
Importance: High

Good morning team,

Attached is the final Information Bulletin regarding today's announcement that BCLC has implemented German's interim recommendation. Also attached is a final Q&A for internal use. Thanks to all involved in assisting with message, Q&A developing on this one.

Sarah D. – Can you please arrange to have the attached IB PDF uploaded to BCLC.com for **11 a.m.** this morning? **Please just check in with me before you hit publish ☺** Can you also monitor social for us and give us a high-level snapshot of tone at the end of the day?

Sarah M. – Can you please arrange to distribute the attached IB PDF to our Lower Mainland media, along with a link to bclc.com, after it has been posted?

Sarah M. – Can you please distribute the attached IB PDF and the Q&A to the following people after the IB is out to media?

- CSC
- Gina Morin
- Comms – PA
- RG team leads via Tamara

Sarah M. / Angela – For media enquiries, we will respond on background, developing messages through the KMs and Q&A attached, and through normal approval processes.

THANK YOU, all. Go team.

Cheers,

Lara

Lara Gerrits

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

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

From: [Laura Piva-Babcock](#)
To: "[Nelson, Tiffany GCPE:EX](#)"; [Megan Harris \(Megan.Harris@gov.bc.ca\)](#)
Cc: [Michele Jaggi-Smith \(michele.jaggismith@gov.bc.ca\)](#); [Jillian Hazel \(Jillian.Hazel@gov.bc.ca\)](#); [Pandachuck, Niki FIN:EX](#); [Jim D. Lightbody](#); [Mazure, John C EMNG:EX](#); [Susan Dolinski](#); [Sarah Morris](#); [Angela Law](#); [Lara Gerrits](#)
Subject: German Recommendation #1
Date: January-05-18 3:22:16 PM
Attachments: [IB BCLC German Rec Complete final 5 Jan 2018.docx](#)
[IN BCLC Implmentation of German Interim Rec. Final 5 Jan 2018.docx](#)
Importance: High

Hello,

On January 10, BCLC will implement Peter German's Interim Recommendation #1 related to declarations of source of funds. As you'll see in the attached IN, BCLC has sent a directive to service providers to implement on that day.

BCLC plans to post the attached information bulletin to our website on January 10 at 10 a.m.

Let us know if you have any questions.

Thanks,

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

BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

Vancouver, B.C., January 10, 2018 – BCLC has implemented the first of Peter German’s interim recommendations, through new procedures requiring Service Providers to gather detailed information on the source of player funds for all transactions of \$10,000 or more.

Effective today, all cash and bank draft / certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. This information will be required before a customer is allowed to buy in and will be reviewed daily by BCLC’s AML unit.

The casino Service Provider’s registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received a source of funds declaration directly from the customer, and completely and accurately recorded that information. In addition, the customer will be required to sign the source of funds declaration form.

If a customer does not provide the information required, provides information that is clearly suspicious or refuses to sign the source of funds declaration, Service Providers must refuse the transaction, document the refusal, and notify BCLC, which will trigger an investigation.

BCLC has always required Service Providers to obtain and record detailed identification information on all customers who buy-in with cash of \$10,000 or more. In addition, source of funds information was required in many other circumstances. This change expands the number and type of transactions to which BCLC’s source of funds declarations apply, and is in direct response to Peter German’s December 5, 2017 [interim recommendation](#) directed at BCLC, prior to delivering his full report on anti-money laundering in Lower Mainland casinos to B.C.’s Attorney General by March 31, 2018:

“Service Providers must complete a Source of Funds Declaration for cash deposits or bearer bonds of \$10,000 or more. At a minimum, the declaration must outline a customer’s identification and provide the source of their funds, including the financial institution and account from which the cash or bond was sourced. After two consecutive transactions, cash can only be accepted from the customer once it has been determined that it is not of a suspicious or illegal nature.”

BCLC will support GPEB as requested and needed with respect to German’s second interim recommendation wherein GPEB investigators should be present in high-volume casinos in the Lower Mainland on a 24/7 basis.

-30-

For more information:

BCLC Media Relations

604-225-6460

mediarelations@bclc.com

From: [BCLC Media Relations](#)
Cc: [BCLC Media Relations](#)
Subject: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Date: January-10-18 11:10:20 AM
Attachments: [IB_BCLC_German_Rec_Complete_final_10_Jan_2018.pdf](#)

**BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Vancouver, B.C., January 10, 2018** – BCLC has implemented the first of Peter German’s interim recommendations, through new procedures requiring Service Providers to gather detailed information on the source of player funds for all transactions of \$10,000 or more.

Effective today, all cash and bank draft / certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. This information will be required before a customer is allowed to buy in and will be reviewed daily by BCLC’s AML unit.

The casino Service Providers’ registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received a source of funds declaration directly from the customer, and completely and accurately recorded that information. In addition, the customer will be required to sign the source of funds declaration form.

If a customer does not provide the required information, provides information that is clearly suspicious or refuses to sign the source of funds declaration, Service Providers must refuse the transaction, document the refusal, and notify BCLC, which will trigger an investigation.

BCLC has always required Service Providers to obtain and record detailed identification information on all customers who buy-in with cash of \$10,000 or more. In addition, source of funds information was required in many other circumstances. The expanded source of funds procedures are in direct response to Peter German’s December 5, 2017 [interim recommendation](#), prior to delivering his full report on anti-money laundering in Lower Mainland casinos to B.C.’s Attorney General by March 31, 2018:

“Service Providers must complete a Source of Funds Declaration for cash deposits or monetary instruments of \$10,000 or more. At a minimum, the declaration must outline a customer’s identification and provide the source of their funds, including the financial institution and account from which the cash or instrument was sourced. After two consecutive transactions, cash can only be accepted from the customer once it has been determined that it is not of a suspicious or illegal nature.”

BCLC will support GPEB as requested and needed with respect to German’s second interim recommendation wherein GPEB investigators should be present in high-volume casinos in the Lower Mainland on a 24/7 basis.

-30-

For more information:
BCLC Media Relations
604-225-6460
mediarelations@bclc.com

KM and QA
Source of Funds Directive (German Rec #1)
January 10, 2018

Key Messages

- We welcome the Attorney General's independent review on the Province's anti-money laundering regime and are pleased that Peter German has provided interim recommendations.
- BCLC has implemented Mr. German's first recommendation by expanding source of funds procedures, and requiring Service Providers to record detailed information about where the customer sourced his or her buy-in funds.
- The expansion of BCLC's existing source of funds procedures will apply to all cash and bank draft/certified cheque buy-ins of \$10,000 or more. This information will be required before a customer is allowed to buy-in, and will be reviewed daily by BCLC's AML unit.
- Any registered gaming worker conducting the transaction will be required to certify that he or she received the source of funds declaration directly from the customer, and completely and accurately recorded that information.
- The customer will also be required to sign the source of funds declaration form.
- If a customer does not provide the information required, provides information that is clearly suspicious, or fails to sign the source of funds declaration form, Service Providers must refuse the transaction and document it. In doing so, an investigation by BCLC AML Investigations will be triggered.
- BCLC will support GPEB as requested and needed with respect to the second recommendation wherein GPEB investigators be on shift and available to high-volume casino operators in the Lower Mainland on a 24/7 basis.
- BCLC is actively engaged in the prevention and detection of money laundering, and will do whatever we can to protect our business and our players.

Q&A

1. **What is the new process?**

As of January 10, 2018, all cash and bank draft / certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. This information will be required before a customer is allowed to buy in and will be reviewed daily by BCLC's AML unit.

The casino Service Provider's registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received a source of funds declaration directly from the customer, and completely and accurately recorded that information. In addition, the customer will be required to sign the source of funds declaration form.

2. **How is this different than what BCLC did previously?**

BCLC has always required Service Providers to obtain and record detailed identification information on all customers who buy-in with cash of \$10,000 or more. In addition, source of funds information was required in many other circumstances. The expanded source of funds procedures are in direct response to Peter German's December 5, 2017 interim recommendation, prior to delivering his full report on anti-money laundering in Lower Mainland casinos to B.C.'s Attorney General by March 31, 2018:

3. **What if a patron's information is incomplete or vague (ie: profession is "housewife")? What next?**

If a customer does not provide the information required, provides information that is clearly suspicious or refuses to sign the source of funds declaration, Service Providers must refuse the transaction, document the refusal, and notify BCLC, which will trigger an investigation.

4. **How will this new policy help deter money laundering?**

Enhanced source of funds information helps strengthen monitoring and reporting of certain players and suspicious play. The BCLC AML team will also be reviewing these files and conducting the appropriate follow up as needed.

This new policy will help encourage patrons to consider opening a Patron Gaming Fund account (where available) and using bank drafts instead of cash for buy-ins. Increasing the use of traceable, cash alternatives helps reduce the potential for criminals to target BC casinos to launder money.

5. **Does BCLC expect to see an impact to its casino business because of these new requirements?**

We anticipate there may be some impacts initially – as would be the case with any significant new process being introduced to players. However, we expect by and large, as customers become familiar with what is required, it will become more routine.

We committed to swiftly implementing Mr. German's recommendation and believe this enhanced source of funds declaration further strengthens our AML program. We appreciate the support from service providers in introducing these improvements.

6. **How will BCLC ensure compliance with this new Source of Funds policy?**

BCLC has investigators on site who will supervise and monitor compliance with the new requirement. In addition, BCLC conducts periodic detailed compliance reviews of service providers at least three times each calendar year.

For the first two weeks of implementation, BCLC's primary focus will be on achieving compliance through education and guidance. We will also be monitoring for any opportunities for process improvements as service providers and customers adjust to the new procedures.

From: [Lara Gerrits](#)
To: ["Nelson, Tiffany GCPE:EX"](#)
Cc: [Joyes, Kieran GCPE:EX](#)
Subject: RE: Call to discuss German recommendations
Date: January-09-18 2:57:18 PM

Hi Tiffany, this is regarding BCLC's plans to communicate our implementation of the German recommendation (happening tomorrow at 10 a.m.). Do you have 5 minutes this afternoon?
Cheers,
LAra

From: Nelson, Tiffany GCPE:EX [mailto:Tiffany.Nelson@gov.bc.ca]
Sent: January-09-18 2:56 PM
To: Lara Gerrits
Cc: Joyes, Kieran GCPE:EX
Subject: Call to discuss German recommendations

Hi Lara – Megan passed along your voice message. Can we set up a call tomorrow to discuss? Kieran will join. I'm free anytime from 11am-1pm.
Thanks,

Tiffany Nelson | Communications Manager
Ministry of Attorney General
Ph: 250 356-6334 | **Cell: S 17(1)**

From: [Lara Gerrits](#)
To: [Laura Piva-Babcock](#)
Subject: RE: Final Information Bulletin - German Recommendation
Date: January-10-18 9:41:14 AM

Yes.

From: Laura Piva-Babcock
Sent: January-10-18 9:39 AM
To: Lara Gerrits
Subject: FW: Final Information Bulletin - German Recommendation
[Did this get done](#)

From: Rob Kroeker
Sent: January-10-18 9:38 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation
[Here is what we provided yesterday. To say s 13](#)

From: Laura Piva-Babcock
Sent: January-10-18 9:35 AM
To: Rob Kroeker <RKroeker@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation
[That is strange. Let me check. L](#)

From: Rob Kroeker
Sent: January-10-18 9:34 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>
Subject: RE: Final Information Bulletin - German Recommendation
[Laura – the IB does not incorporate the corrections LCS provided yesterday.](#)

From: Laura Piva-Babcock
Sent: January-10-18 9:31 AM
To: Jim D. Lightbody <JDLightbody@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>; Brad Desmarais <BDesmarais@bclc.com>; Rob Kroeker <RKroeker@bclc.com>; Jennifer Keim <JKeim@BCLC.com>; Kevin Sweeney <KSweeney@BCLC.com>; Garth Pieper <GPieper@BCLC.com>; John Karlovcec <JKarlovcec@bclc.com>; Kevin Gass <KGass@BCLC.com>; Amanda Hobson <AHobson@bclc.com>; Monica Bohm <MBohm@BCLC.com>; Pat Davis <PDavis@BCLC.com>; Jamie Wiebe <JWiebe@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: Final Information Bulletin - German Recommendation

Hi,

Today at 10 a.m. we will be distributing the attached information bulletin to BC media regarding the implementation of Peter German's interim recommendation #1.

I have also attached the QA that is for internal use and development of media messaging. Thanks to those who helped finalize these documents.

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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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](#)
To: [Lara Gerrits](#); [Jim D. Lightbody](#); [Brad Desmarais](#)
Cc: [Susan Dolinski](#); [Laura Piva-Babcock](#); [John Karlovcec](#)
Subject: RE: For review - revised German communications materials
Date: January-09-18 3:03:53 PM
Attachments: [IB_BCLC German Rec Complete draft 5 Jan 2018 \(LCS edits\).docx](#)

Some edits – please see attached.

From: Lara Gerrits
Sent: January-09-18 2:07 PM
To: Jim D. Lightbody ; Rob Kroeker ; Brad Desmarais
Cc: Susan Dolinski ; Laura Piva-Babcock ; John Karlovcec
Subject: For review - revised German communications materials
Importance: High

Hello,

We have made a few adjustments to the Info Bulletin that you previous reviewed regarding implementation of the German recommendation. The revision is intended to provide more detail, and align with messaging on signage in place at facilities. Please see attached draft IB – changes are highlighted in yellow for your ease of review.

In addition, we have pulled together a brief Q&A to support BCLC and SP staff in responding to questions about the expanded procedures. Please review and provide any feedback.

We would like to finalize both of these documents ASAP and plan to post the Info Bulletin tomorrow at 10 a.m.

Please let me know if you have any questions/concerns.

Thanks so much,

Lara

Lara Gerrits

Manager, Media & Issues Management (Interim)
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6

T 604 228 3066 C s 17(1)

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

From: [Lara Gerrits](#)
To: [Sarah Darcey](#)
Subject: RE: German recommendation - this morning
Date: January-10-18 11:12:12 AM

Thanks!

From: Sarah Darcey
Sent: January-10-18 11:09 AM
To: Lara Gerrits ; Sarah Morris ; Angela Law
Cc: Laura Piva-Babcock ; Doug Cheng
Subject: RE: German recommendation - this morning
Live: <http://corporate.bclc.com/media-centre/bclc-news/news-search/news-management/bclc-expands-source-of-funds-procedures-in-bc-gambling-facilities.html>
Sarah D'Arcey
Communications Officer, Corporate Communications
T 604 228 3042 C s 17(1)

From: Lara Gerrits
Sent: Wednesday, January 10, 2018 11:09 AM
To: Sarah Darcey <SDArcey@BCLC.com>; Sarah Morris <SMorris@BCLC.com>; Angela Law <ALaw@BCLC.com>
Cc: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Doug Cheng <DCheng@bclc.com>
Subject: RE: German recommendation - this morning
THE EAGLE HAS LANDED.
Good to go.
Sarah can you also please post on YAK.
And Sarah M. will send to BC-wide media not just LM.
Thanks, all! 😊

From: Lara Gerrits
Sent: January-10-18 10:31 AM
To: Sarah Darcey <SDArcey@BCLC.com>; Sarah Morris <SMorris@BCLC.com>; Angela Law <ALaw@BCLC.com>
Cc: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Doug Cheng <DCheng@bclc.com>
Subject: German recommendation - this morning
Importance: High
Good morning team,
Attached is the final Information Bulletin regarding today's announcement that BCLC has implemented German's interim recommendation. Also attached is a final Q&A for internal use. Thanks to all involved in assisting with message, Q&A developing on this one.
Sarah D. – Can you please arrange to have the attached IB PDF uploaded to BCLC.com for **11 a.m.** this morning? **Please just check in with me before you hit publish 😊** Can you also monitor social for us and give us a high-level snapshot of tone at the end of the day?
Sarah M. – Can you please arrange to distribute the attached IB PDF to our Lower Mainland media, along with a link to bclc.com, after it has been posted?
Sarah M. – Can you please distribute the attached IB PDF and the Q&A to the following people after the IB is out to media?
• CSC

- Gina Morin
- Comms – PA
- RG team leads via Tamara

Sarah M. / Angela – For media enquiries, we will respond on background, developing messages through the KMs and Q&A attached, and through normal approval processes.

THANK YOU, all. Go team.

Cheers,

Lara

Lara Gerrits

Manager, Media & Issues Management (Interim)
BCLC, 2940 Virtual Way, Vancouver, B.C., V5M 0A6

T 604 228 3066 C s 17(1)

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

From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#); [Lara Gerrits](#)
Subject: RE: IB German - distribution
Date: January-09-18 1:13:17 PM

We already had included 24 hr info. I altered the “receipt” wording to “declaration” since that’s what we’ve been saying all along. See second para in Q1. [QA](#)

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 1:05 PM
To: Sarah Morris ; Lara Gerrits
Subject: FW: IB German - distribution
[Hi Sarah – is this level of detail in the qa](#)

From: Laura Piva-Babcock
Sent: January-09-18 12:57 PM
To: Susan Dolinski <SDolinski@BCLC.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: RE: IB German - distribution

From: Susan Dolinski
Sent: January-09-18 12:56 PM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: RE: IB German - distribution
[What do the signs look like?](#)

Susan Dolinski

Vice President, Social Responsibility & Communications
BCLC

2940 Virtual Way, Vancouver BC V5M 0A6

T 604-228-3096 **F** 604-225-6422 **C s** 17(1)

sdolinski@bclc.com

bclc.com

[Last year, more than \\$1 billion generated by BCLC gambling supported health care, education and community groups across B.C.](#)

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 12:50 PM
To: Susan Dolinski <SDolinski@BCLC.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: IB German - distribution

Hi Susan,

Lara and I have been discussing the German IB. I had said we would just post it to our website. However, that’s before I knew there was widespread signage in all casinos already up this week announcing the new rules. I am also waiting to hear whether the BCGIA is distributing a statement tomorrow (Peter is just asking his group).
For BCLC we are not recommending **s 13**

. My recommendation is:

s 13

. Let me know if

you’re good with this or if there have been other conversations today.

Thanks,

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

From: [Lara Gerrits](#)
To: [Susan Dolinski](#)
Subject: RE: IB vs NR
Date: January-09-18 1:39:25 PM

Will do.

From: Susan Dolinski
Sent: January-09-18 1:39 PM
To: Lara Gerrits
Cc: Laura Piva-Babcock
Subject: IB vs NR

Lara – just a thought – why don't you call tiffany first and see what her thoughts are on a NR vs IB. that way we can consider their opinion before changing our minds the day before.

Susan Dolinski

Vice President, Social Responsibility & Communications

BCLC

2940 Virtual Way, Vancouver BC V5M 0A6

T 604-228-3096 **F** 604-225-6422 **C s** 17(1)

sdolinski@bclc.com

bclc.com

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

From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#)
Cc: [Lara Gerrits](#)
Subject: RE: IB_BCLC German Rec Complete_draft_5 Jan 2018
Date: January-05-18 11:46:38 AM
Attachments: [IB_BCLC German Rec Complete_draft_5 Jan 2018.docx](#)

Great. Clean title to send to RK et al attached.

From: Laura Piva-Babcock
Sent: Friday, January 05, 2018 11:40 AM
To: Sarah Morris
Cc: Lara Gerrits
Subject: RE: IB_BCLC German Rec Complete_draft_5 Jan 2018
[Perfect. Thank you. L](#)

From: Sarah Morris
Sent: January-05-18 11:20 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: RE: IB_BCLC German Rec Complete_draft_5 Jan 2018
I made a few edits in first two paras to language to try and plain-language/simplify a bit. Let me know how this reads to you.

From: Laura Piva-Babcock
Sent: Friday, January 05, 2018 11:05 AM
To: Sarah Morris <SMorris@BCLC.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: IB_BCLC German Rec Complete_draft_5 Jan 2018

Hi,

Thanks Sarah. Really glad you were on this – since things are moving faster than anticipated. I used the language in the IN for the IB – I like that it refers to the fact we already had a process. The first paragraph is a bit wordy, so take a look and see if there is a way to clean it up. Once it's done please send to me and I'll get it to Rob and John. I'm still waiting for him to fill in some blanks in the IN (since it's almost a month old).

Thanks, L

From: [Sarah Morris](#)
To: [Lara Gerrits](#)
Subject: RE: IB_BCLC German Rec Complete_draft_15 Dec 2017
Date: January-05-18 8:52:14 AM

[Did you want that final paragraph in bold?](#)

From: Lara Gerrits
Sent: Friday, January 05, 2018 8:48 AM
To: Sarah Morris
Subject: IB_BCLC German Rec Complete_draft_15 Dec 2017

Sarah, this looks awesome. Thank you. I've made a few minor changes, tracked. Can you clean up and send to LPB for her review and CC me? It's still saved in one of the two AML files ☺ This one...
s 15(1)(l)

Cheers,
Lara

From: [BCLC Media Relations](#)
To: ["scooper@postmedia.com"](mailto:scooper@postmedia.com)
Cc: [BCLC Media Relations](#)
Subject: RE: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities
Date: January-11-18 10:56:36 AM
Attachments: [image001.png](#)

Hi Sam,

I know that the Sun has already published a short story on this, but I wanted to provide some additional detail based on your questions from yesterday.

This change is, for the most part, the extension of an existing process and so is not entirely new to BCLC AML staff or Service Providers. The process will be straightforward for those who are used to working with AML requirements, which we expect will ease implementation.

As was laid out in Mr. German's recommendation, all cash, bank draft, and certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. The customer will be required to sign the source of funds declaration form and the casino Service Providers' registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received the source of funds declaration directly from the customer, and completely and accurately recorded that information.

This information will be required before a customer is allowed to buy in. BCLC staff will review compliance with this process closely and will quickly address any issues that arise.

Aggressive or dangerous behavior is not tolerated in any gambling facility in B.C. We expect that as customers become familiar with what is required, it will become more routine.

I trust this helps, and thanks for your patience.

Cheers,

Lara Gerrits

BCLC Media Relations

mediarelations@bclc.com

604-225-6460

From: Cooper, Sam [mailto:scooper@postmedia.com]

Sent: January-10-18 11:23 AM

To: BCLC Media Relations

Subject: FW: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

Hello, I have a question regarding the implementation of these source of funds recommendations, this comes from our chief editor.

Does BCLC AML unit and large GSP's such as River Rock have the staff in place to actually conduct the checks required and the customer declarations, in order to reject any non-compliant or suspicious buy-in attempts on site, immediately?

Or, does more hiring need to be done in order to staff up and actually enforce these new rules? Staffing could involve BCLC staff, GPEB monitors, or GSP staff.

Secondly, as Section 86 reports show, a number of banned patrons frequently make attempts to enter casinos, and sometimes aggressively react to security staff requests that they leave. Is there a concern, that when patrons have buy ins rejected, they could become aggressive and threatening?

Thanks, please respond by 3 pm

From: "Munro, Harold" <HMunro@postmedia.com>

Date: Wednesday, January 10, 2018 at 11:13 AM

To: Postmedia Inc <scooper@postmedia.com>

Subject: FW: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

HAROLD MUNRO

EDITOR-IN-CHIEF

Vancouver Sun | The Province

T 604.605.2185

Cs 17(1)

#400 – 2985 Virtual Way

Vancouver, BC V5M 4X7



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From: BCLC Media Relations <MediaRelations@bclc.com>

Date: Wednesday, January 10, 2018 at 11:10 AM

Cc: BCLC Media Relations <MediaRelations@bclc.com>

Subject: Info Bulletin: BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

BCLC Expands Source of Funds Procedures in B.C. Gambling Facilities

Vancouver, B.C., January 10, 2018 – BCLC has implemented the first of Peter German's interim recommendations, through new procedures requiring Service Providers to gather detailed information on the source of player funds for all transactions of \$10,000 or more.

Effective today, all cash and bank draft / certified cheque buy-ins for \$10,000 or more, in one or more transactions within a 24-hour period, will require a source of funds receipt. The original receipt must be from the same day of the transaction and show the financial institution, branch number and account number. This information will be required before a customer is allowed to buy in and will be reviewed daily by BCLC's AML unit.

The casino Service Providers' registered gaming worker conducting the transaction at the cash cage will be required to certify that he or she received a source of funds declaration directly from the customer, and completely and accurately recorded that information. In addition, the customer will be required to sign the source of funds declaration form.

If a customer does not provide the required information, provides information that is clearly suspicious or refuses to sign the source of funds declaration, Service Providers must refuse the transaction, document the refusal, and notify BCLC, which will trigger an investigation.

BCLC has always required Service Providers to obtain and record detailed identification information on all customers who buy-in with cash of \$10,000 or more. In addition, source of funds information was required in many other circumstances. The expanded source of funds procedures are in direct response to Peter German's December 5, 2017 [interim recommendation](#), prior to delivering his full report on anti-money laundering in Lower Mainland casinos to B.C.'s Attorney General by March 31, 2018:

"Service Providers must complete a Source of Funds Declaration for cash deposits or monetary instruments of \$10,000 or more. At a minimum, the declaration must outline a

customer's identification and provide the source of their funds, including the financial institution and account from which the cash or instrument was sourced. After two consecutive transactions, cash can only be accepted from the customer once it has been determined that it is not of a suspicious or illegal nature."

BCLC will support GPEB as requested and needed with respect to German's second interim recommendation wherein GPEB investigators should be present in high-volume casinos in the Lower Mainland on a 24/7 basis.

-30-

For more information:

BCLC Media Relations

604-225-6460

mediarelations@bclc.com

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From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#)
Cc: [Lara Gerrits](#)
Subject: RE: Information Bulletin - German
Date: January-05-18 1:43:03 PM
Attachments: [IB_BCLC German Rec Complete final 5 Jan 2018.docx](#)
Importance: High

[Sorry wrong file name- here you go](#)

From: Laura Piva-Babcock
Sent: Friday, January 05, 2018 1:34 PM
To: Sarah Morris
Cc: Lara Gerrits
Subject: Information Bulletin - German

Hi Sarah,

Can you please save this one down as the latest draft – Rob has reviewed. And send back to me. I want to get this to Jim so I can then talk to Tiffany as well today hopefully.

Thanks. L

From: [Sarah Morris](#)
To: [Laura Piva-Babcock](#); [Lara Gerrits](#)
Subject: RE: Question re German IB
Date: January-09-18 1:01:41 PM
Attachments: [KM and QA German Rec SOF Directive draft 9 Jan 2018.docx](#)

Kept it titled draft as I assume Rob et al will be reviewing...

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 12:56 PM
To: Sarah Morris ; Lara Gerrits
Subject: RE: Question re German IB

Hi – thanks for this Sarah, I’ve moved a few things around and added some things as well based on recent conversations I’ve had. Please update and send attachment to me and Lara. Thanks, L

From: Sarah Morris
Sent: January-09-18 11:16 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>; Lara Gerrits <LGerrits@bclc.com>
Subject: RE: Question re German IB
Ok here is revised [QA](#)...thoughts?

From: Laura Piva-Babcock
Sent: Tuesday, January 09, 2018 11:12 AM
To: Lara Gerrits <LGerrits@bclc.com>; Sarah Morris <SMorris@BCLC.com>
Subject: FW: Question re German IB

Lara – can you edit the IB – Sarah I think in our QA we need to speak to the fact we have compliance teams that review compliance and GPEB conducts routine audits of sp operations.

From: Jim D. Lightbody
Sent: January-09-18 10:52 AM
To: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Cc: Rob Kroeker <RKroeker@bclc.com>; Susan Dolinski <SDolinski@BCLC.com>
Subject: Re: Question re German IB

It would be a GPEB decision, so let’s leave it out.
Thanks

From: Laura Piva-Babcock <LPiva-Babcock@bclc.com>
Date: January 9, 2018 at 10:43:46 AM PST
To: Jim D. Lightbody <JDLightbody@bclc.com>
Cc: Rob Kroeker <RKroeker@bclc.com>, Susan Dolinski <SDolinski@BCLC.com>
Subject: Question re German IB

Hi,

Jim, you had asked that this be added into the IB regarding what happens if staff do not complete the documentation as per the directive, *Failing to do this will result in potential sanctions to the gaming worker, including loss of their registration.*

We are working on our QA and are wondering what those sanctions will be and which organization would level these sanctions (BCLC/GPEB). I note there may be confusion in media since there has been a lot of coverage about the OSA being a tool for enforcement.

Thanks,

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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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](#)
To: [John Karlovcec](#); [Laura Piva-Babcock](#)
Cc: [Lara Gerrits](#)
Subject: RE: Recommendation 1
Date: January-05-18 7:09:51 AM

Good morning Laura

Probably good timing to get the IN written today so we can let the MO know before the implementation next Wednesday.

As to how its implemented, there is nothing terribly complex. It follows the German recommendation where a player will have to declare prior to buy-in of \$10K or more the source of the funds and provide bank, account # and name corresponding to the account. The player's identity is also acquired, but that has always been done for transactions of this size.

Rob

From: John Karlovcec
Sent: January-05-18 7:06 AM
To: Laura Piva-Babcock ; Rob Kroeker
Cc: Lara Gerrits
Subject: RE: Recommendation 1

Hi Laura,

Fyi we sent out the notification to all service providers yesterday. To be implemented next Wednesday January 10, 2018.

John

From: Laura Piva-Babcock
Sent: January-04-18 10:04 AM
To: Rob Kroeker <RKroeker@bclc.com>; John Karlovcec <JKarlovcec@bclc.com>
Cc: Lara Gerrits <LGerrits@bclc.com>
Subject: Recommendation 1

Hi Rob,

As discussed, we will post an info bulletin to our website indicating we have completed recommendation 1. We will do this once the recommendation is implemented and once Jim/you have appropriately informed government and Mr. German about the completion.

My thinking is the information bulletin will outline the recommendation, the date it was implemented and any details about how it was implemented that are shareable publicly.

We will also do an IN for government outlining how we have implemented, the date, etc.

You mentioned it will likely be implemented in five days or so. Please keep us posted and also provide us what the final implementation looks like, which we can use in the IN.

Thanks,

Laura Piva-Babcock

Director, Communications

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

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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: [Nelson, Tiffany GCPE:EX](mailto:Nelson.Tiffany@bc.ca)
To: [Lara Gerrits](mailto:Lara.Gerrits@bccl.com)
Cc: [Joyes, Kieran GCPE:EX](mailto:Joyes.Kieran@bc.ca); [Harris, Megan A GCPE:EX](mailto:Harris.Megan@bc.ca); [Laura Piva-Babcock](mailto:Lara.Piva-Babcock@bccl.com); [Sarah Morris](mailto:Sarah.Morris@bccl.com); [Angela Law](mailto:Angela.Law@bccl.com)
Subject: Re: With edits: BCLC Information Bulletin - German recommendation
Date: January-10-18 9:36:14 AM

Thanks Lara. Can you send over the final I can share with Mo?

On Jan 10, 2018, at 9:21 AM, Lara Gerrits <LGerrits@bccl.com<<mailto:LGerrits@bccl.com>>> wrote:

Hi Tiffany,

Thanks for this, all. As per my original email below, we plan to distribute this to media today at 10 a.m.

Thanks,

Lara

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

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

From: Nelson, Tiffany GCPE:EX [<mailto:Tiffany.Nelson@gov.bc.ca>]
Sent: January-10-18 9:05 AM
To: Lara Gerrits <LGerrits@bccl.com<<mailto:LGerrits@bccl.com>>>; Joyes, Kieran GCPE:EX <Kieran.Joyes@gov.bc.ca<<mailto:Kieran.Joyes@gov.bc.ca>>>; Harris, Megan A GCPE:EX <Megan.Harris@gov.bc.ca<<mailto:Megan.Harris@gov.bc.ca>>>
Cc: Laura Piva-Babcock <LPiva-Babcock@bccl.com<<mailto:LPiva-Babcock@bccl.com>>>; Sarah Morris <SMorris@BCLC.com<<mailto:SMorris@BCLC.com>>>; Angela Law <ALaw@BCLC.com<<mailto:ALaw@BCLC.com>>>
Subject: With edits: BCLC Information Bulletin - German recommendation

Hi Lara – please take a look at the edits tracked and let me know if you have any questions.

Thanks,

Tiffany
250 858-4680

From: Lara Gerrits [<mailto:LGerrits@bccl.com>]
Sent: Wednesday, January 10, 2018 8:49 AM
To: Joyes, Kieran GCPE:EX <Kieran.Joyes@gov.bc.ca<<mailto:Kieran.Joyes@gov.bc.ca>>>; Harris, Megan A GCPE:EX <Megan.Harris@gov.bc.ca<<mailto:Megan.Harris@gov.bc.ca>>>; Nelson, Tiffany GCPE:EX <Tiffany.Nelson@gov.bc.ca<<mailto:Tiffany.Nelson@gov.bc.ca>>>
Cc: XT:Piva-Babcock, Laura FIN:IN <lpiva-babcock@bccl.com<<mailto:lpiva-babcock@bccl.com>>>; Sarah Morris

<SMorris@bclc.com<<mailto:SMorris@bclc.com>>>; Angela Law <ALaw@bclc.com<<mailto:ALaw@bclc.com>>>
Subject: RE: BCLC Information Bulletin - German recommendation

Hi Kieran,

Just checking in on this Information Bulletin and if you have an ETA on when you expect to get any comments back. Much thanks!

Cheers,

Lara

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

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

From: Joyes, Kieran GCPE:EX [<mailto:Kieran.Joyes@gov.bc.ca>]
Sent: January-09-18 4:30 PM
To: Harris, Megan A GCPE:EX <Megan.Harris@gov.bc.ca<<mailto:Megan.Harris@gov.bc.ca>>>; Lara Gerrits <LGerrits@bclc.com<<mailto:LGerrits@bclc.com>>>; Nelson, Tiffany GCPE:EX <Tiffany.Nelson@gov.bc.ca<<mailto:Tiffany.Nelson@gov.bc.ca>>>
Cc: Laura Piva-Babcock <LPiva-Babcock@bclc.com<<mailto:LPiva-Babcock@bclc.com>>>; Sarah Morris <SMorris@BCLC.com<<mailto:SMorris@BCLC.com>>>; Angela Law <ALaw@BCLC.com<<mailto:ALaw@BCLC.com>>>
Subject: RE: BCLC Information Bulletin - German recommendation

Hi Lara,

GPEB is taking a look at the materials – we are endeavouring to provide any feedback we have by first thing tomorrow.

Thanks,

Kieran

From: Harris, Megan A GCPE:EX
Sent: Tuesday, January 9, 2018 3:39 PM
To: 'Lara Gerrits'; Nelson, Tiffany GCPE:EX
Cc: XT:Piva-Babcock, Laura FIN:IN; Sarah Morris; Angela Law; Joyes, Kieran GCPE:EX
Subject: RE: BCLC Information Bulletin - German recommendation

Hi Lara,

Kieran is reviewing this and will get back to you as soon as he can.

Megan

From: Lara Gerrits [<mailto:LGerrits@bclc.com>]
Sent: Tuesday, January 9, 2018 3:37 PM
To: Nelson, Tiffany GCPE:EX; Harris, Megan A GCPE:EX
Cc: XT:Piva-Babcock, Laura FIN:IN; Sarah Morris; Angela Law
Subject: BCLC Information Bulletin - German recommendation

Hi Tiffany and Megan,

Attached is our final Information Bulletin re: implementation of German's recommendation to BCLC. Megan, I know that you and Laura initially discussed this getting posted to bclc.com <<http://bclc.com>> tomorrow at 10 a.m.

Given that signage is already in place in facilities advising customers of procedures going into effect tomorrow, we would like to proactively distribute this Information Bulletin to media in order to be as transparent as possible. We would like to do this at 10 a.m.

Please advise of any concerns. I know we haven't been able to connect via phone, but feel free to give me a call if that's easier.

Cheers,

Lara

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

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

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From: [Lara Gerrits](#)
To: [Laura Piva-Babcock](#)
Subject: ROb changes
Date: January-10-18 10:07:33 AM

This is what we sent to Rob for his review yesterday:

s 13

He edited, and came back with this:

s 13

Lara Gerrits

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

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From: [Lara Gerrits](#)
To: [Susan Dolinski](#)
Cc: [Laura Piva-Babcock](#)
Subject: updated German materials
Date: January-09-18 1:49:42 PM
Attachments: [IB_BCLC German Rec Complete draft 5 Jan 2018.docx](#)
[KM and OA German Rec SOF Directive draft 9 Jan 2018.docx](#)
Importance: High

Hi Susan,

I have a message in to Megan re: communications plans for tomorrow. In the meantime, we have added some more detail into the IB. Please see attached (updates are highlighted in yellow). I have mirrored this detail in the Q&A – also attached.

If you are good with the IB, I would like to re-distribute to Jim, Brad and Rob so they are aware of changes from what they had previously seen. As we would like to share the final Q&A with the BCGIA, CSC, etc., it may be good for Jim/Brad/Rob to review that as well at the same time.

Let me know if you have any questions/concerns.

Thanks,

Lara

Lara Gerrits

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

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

From: [Lara Gerrits](#)
To: [Laura Piva-Babcock](#)
Subject: Updated IB
Date: January-10-18 9:10:00 AM
Attachments: [IB_BCLC German Rec Complete_final_5 Jan 2018 @KJ.docx \(GPEB advice\).docx](#)

Hi Laura,

Here is the updated IB with GPEB and GCPE revisions. I suggest we re-send to Rob for his review.

Cheers,

Lara

From: [Jim D. Lightbody](#)
To: [Laura Piva-Babcock](#); [Rob Kroeker](#)
Cc: [Jim D. Lightbody](#)
Subject: IB_BCLC German Rec Complete_final_5 Jan 2018
Date: January-05-18 2:35:40 PM
Attachments: [IB_BCLC German Rec Complete_final_5 Jan 2018.docx](#)

I made a couple edits. Let me know if you agree.

Thanks

From: [Laura Piva-Babcock](#)
To: [Jim D. Lightbody](#)
Subject: Information Bulletin - German
Date: January-05-18 1:46:45 PM
Attachments: [IB_BCLC German Rec Complete final 5 Jan 2018.docx](#)
Importance: High

Hi Jim,

Here is the information bulletin as reviewed by Rob and me. Let me know if you have any changes.

Thanks. L

From: [Laura Piva-Babcock](#)
To: [Jim D. Lightbody](#); [Susan Dolinski](#); [Brad Desmarais](#); [Rob Kroeker](#); [John Karlovcec](#); [Garth Pieper](#); [Jennifer Keim](#); [Kevin Sweeney](#)
Subject: MEDIA REQUESTS CHNL & Fairchild Radio - BCLC Expands Source of Funds Procedures
Date: January-10-18 12:54:46 PM

Hello

We have received two media calls about today's announcement and have responded with our key messages.

Reporter / Outlet / Contact: Angelo Iacobucci, CHNL & Eric Cheung, Fairchild Radio AM 1470

Request:

What are German's recommendations?

What is BCLC doing?

Timelines for implementing the other recommendations.

Response: Provide response on background

- * We welcome the Attorney General's independent review on the Province's anti-money laundering regime and are pleased that Peter German has provided two interim recommendations.

- * BCLC has implemented Mr. German's first recommendation by expanding source of funds procedures, and requiring Service Providers to record detailed information about where the customer sourced his or her buy-in funds.

- * The expansion of BCLC's existing source of funds procedures will apply to all cash and bank draft/certified cheque buy-ins of \$10,000 or more. This information will be required before a customer is allowed to buy-in, and will be reviewed daily by BCLC's AML unit.

- * Any registered gaming worker conducting the transaction will be required to certify that he or she received the source of funds declaration directly from the customer, and completely and accurately recorded that information.

- * The customer will also be required to sign the source of funds declaration form.

- * If a customer does not provide the information required, provides information that is clearly suspicious, or fails to sign the source of funds declaration form, Service Providers must refuse the transaction and document it. In doing so, an investigation by BCLC AML Investigations will be triggered.

- * BCLC will support GPEB as requested and needed with respect to the second recommendation wherein GPEB investigators be on shift and available to high-volume casino operators in the Lower Mainland on a 24/7 basis.

- * BCLC is actively engaged in the prevention and detection of money laundering, and will do whatever we can

to protect our business and our players.

Regards,

Laura

From: [Rob Kroeker](#)
To: [Jim D. Lightbody](#); [Laura Piva-Babcock](#)
Subject: RE: IB_BCLC German Rec Complete_final_5 Jan 2018
Date: January-05-18 2:37:31 PM

No issues from my end

From: Jim D. Lightbody
Sent: January-05-18 2:36 PM
To: Laura Piva-Babcock ; Rob Kroeker
Cc: Jim D. Lightbody
Subject: IB_BCLC German Rec Complete_final_5 Jan 2018

I made a couple edits. Let me know if you agree.

Thanks