## COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

## The Honourable Mr. Austin F. Cullen, Commissioner

### CERTIFICATE

I, Susan Humphrey, certify that I participated in a video conference call with Bradley Allan Rudnicki on May 5, 2021 for the purposes of commissioning Mr. Rudnicki's Affidavit No. 2 in respect of this matter in accordance with the Supreme Court of British Columbia Notice to the Profession, the Public and the Media re Affidavits for use in Civil and Family Proceedings, dated March 27, 2020 (the "Notice").

I further certify that the process set out in the Notice was followed and that I am satisfied that this process was necessary because it was impossible or unsafe, for medical reasons, for me and Mr. Rudnicki to be physically present together.

DATED at Vancouver, British Columbia, on this 5<sup>th</sup> day of May, 2021.

Susan Humphrey

# COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

## The Honourable Mr. Austin F. Cullen, Commissioner

#### **AFFIDAVIT**

- I, Bradley Allan Rudnicki, with a business address of 2940 Virtual Way, Vancouver, British Columbia, AML Intelligence Specialist for British Columbia Lottery Corporation, AFFIRM THAT:
- 1. I am employed as an Anti-Money Laundering ("AML") Intelligence Specialist for British Columbia Lottery Corporation ("BCLC"), and as such have personal knowledge of the facts and matters in this affidavit. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of that information and belief. I believe that all of the information in this affidavit is true.
- 2. I affirm this affidavit further to my Affidavit No. 1, affirmed April 7, 2021, in this Inquiry.
- 3. At paragraphs 10 to 15 of my Affidavit No. 1, I describe an Excel spreadsheet that I prepared for use by the Commission (BCLC0016964), which summarized certain BCLC STR and LCT reporting data (the "Original Spreadsheet").
- 4. I have prepared a revised version of the Original Spreadsheet (the "Revised Spreadsheet"). I have been shown the Excel document produced to the Commission as BCLC0016998, and I confirm that it is the Revised Spreadsheet that I prepared.
- 5. The Revised Spreadsheet reflects the following changes that I made to the Original Spreadsheet, at the request and direction of FINTRAC and Commission counsel:
  - (a) I removed the following columns of demographic information about the anonymized patrons: sex; ethnicity; age range; and occupation. For two of the

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anonymized patrons, I moved their classification as "student" from the occupation column to the industry column, so as to retain that information in the Revised Spreadsheet.

- (b) I removed "city" and "province" information from the Revised Spreadsheet, and replaced it with columns specifying whether the anonymized patron is a B.C. resident, and whether the patron is a Lower Mainland resident, with information reported in those columns on a "yes"/"no" basis.
- (c) I added an explanatory note to the Revised Spreadsheet to specify the specific municipalities that are included in "Lower Mainland" for the purpose of that column of the Revised Spreadsheet.
- 6. I make this Affidavit No. 2 for use in the Cullen Commission of Inquiry into Money Laundering in British Columbia and to supplement my Affidavit No. 1 in this Inquiry, and for no other purpose.

When affirming this affidavit, the deponent was not physically present before the commissioner for taking affidavits because it is medically unsafe to meet in person due to the ongoing COVID-19 pandemic. The deponent was linked with the commissioner for taking affidavits using video conference technology. The process described in the Supreme Court of British Columbia's March 27, 2020 Notice to the Profession, the Public and the Media regarding Affidavits for Use in Court Proceedings (COVID-19 Notice No. 2) was followed.

AFFIRMED BEFORE ME via
videoconference with the affiant in Burnaby,
British Columbia and the Commissioner in
Vancouver, British Columbia, on May 5,
2021

A commissioner for taking affidavits for
British Columbia

BRADLEY ALIAN RUDNICKI

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l. Humphul	) )
A commissioner for taking afficiavits for British Columbia	) BRADLEY ALLAN RUDNICKI )

SUSAN J. HUMPHREY

Barrister and Solicitor

Hunter Litigation Chambers

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