

Affidavit of Ross ALDERSON

My name is Ross Alderson and I am a former employee of the British Columbia Lottery Corporation (BCLC). I was hired as a lottery investigator in November 2008, and I resigned on the 21st of December 2017*. My last role with the BCLC was as the Director, Anti Money Laundering and Investigations.

**This report contains emails recently retrieved from a previously used email account and some may have been retrieved displaying an Australian time/date zone which is 17-18 hours ahead of BC, Canada. Therefore, some emails may be approximate in date and time.*

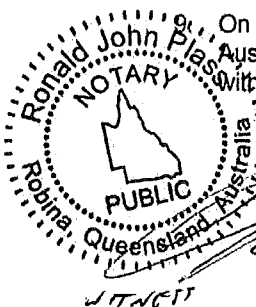
On March 9, 2021 the Magazine "Business in Vancouver" (BIV) published an article titled: **Money Laundering Whistleblower Vanishes Without a Trace**

In response to that article and others, social media speculation of my whereabouts, and other public allegations I would like to state the following:

Cullen Commission Exhibits

1. **Exhibit No. 499 - Resignation letter of Ross Alderson**
2. I resigned from BCLC on approximately December 21, 2017. My resignation was backdated to December 15, 2017. Attached to this report is **Exhibit A** which is an email sent by BCLC's external lawyer to myself on December 17, 2017 detailing the mutual release. The "resignation" letter on the Cullen Commission is dated October 3, 2017. It is not my resignation letter and was never sent by me to anyone. The naming of this exhibit is false and misleading and this "resignation letter" has now been incorrectly referenced in multiple media reports including:
3. On January 29, 2021 in the Vancouver Sun: **"Lightbody maintained Eby complained after a BCLC lawyer sent a warning letter to Ross Alderson, who resigned Oct. 3, 2017, as the firm's director of anti-money-laundering investigations....."**
4. On March 9, 2021 in the Business in Vancouver: **"resignation letter is an inquiry exhibit..."** (in reference to myself)
5. In the last 2-3 years several gambling industry board members, executives and senior managers have left the industry including some who were terminated. One has adverse court findings as to their character. (Information the Commission knows) To the best of my knowledge no other person other than myself has a "resignation letter" attached as a public exhibit.
6. **Exhibit No. 573 - Overview Report Ross Alderson**
7. On October 2, 2019 I met with the Cullen Commission lawyers for the first time in Vancouver. Over several hours I provided detailed information including a proposed witness list and I recommended certain documents they should obtain. I was told by the Commission lawyers it more appropriate I was a witness rather than a participant. I naively agreed. On that date I informed the Cullen Commission that I had recently returned from a personal trip to Australia and that I was considering moving back there for work opportunities.
8. Between October 2, 2019 and February 11, 2020, I corresponded with the Cullen Commission lawyers multiple times including assisting them in locating witnesses and provided further evidence.

On February 11, 2020 I emailed the Cullen Commission to notify them I was moving to Australia in March 2020 and provided further information. In my email I volunteered to meet with them before I left. Email attached. (**Exhibit B**)



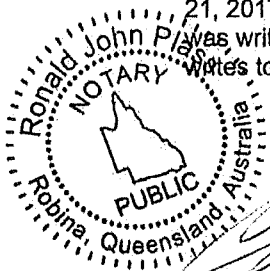
10. On February 19, and 29, 2020 I received emails from the Cullen Commission acknowledging my upcoming move to Australia and we mutually agreed to a meeting on March 2, 2020 at their office. These emails are also attached. (**Exhibits C and D**)
11. On March 2, 2020 I met with the Cullen Commission lawyers and I provided further information. During my meeting with the Cullen Commission lawyers on March 2, 2020 after returning from a bathroom break, I was given a summons to appear at a hearing in Vancouver in September 2020. At that time the Cullen Commission lawyers knew I was planning on leaving the country within weeks. I was told on March 2, 2020 "I may or may not be required." One of the Cullen Commission lawyers wished me well on my move and "hoped I was able to put all of this behind me."
12. The exhibit 573 is a complete mischaracterisation of events as clearly evidenced by the exhibits B, C and D.

Move to Australia

13. Global covid restrictions had a significant impact on the move to Australia. My family's household items were shipped to Australia in May 2020 including most of the electronics and the summons. My flights were rescheduled from March 2020, and my family and I finally left Canada on July 6, 2020. Just prior to July 6, 2020 I cancelled my Canadian mobile phone contract. I left a forwarding postal address.
14. My family were rerouted from our original Australia destination due to covid restrictions. After completing 2 weeks of mandatory quarantine my family were displaced for several months due to those covid restrictions. This limited our ability to travel, visit family, obtain our shipped goods or pursue our previously arranged school and work prospects. For the rest of the next 9 months, we either lived out of a campervan, resided in caravan parks or in short term rentals. In late 2020 my family was able to find work and a school for our child. However as of writing we do not have a permanent residence, and our household goods from Canada are still in storage interstate.
15. In 2020 I started to get a number of strange anonymous emails inquiring on my whereabouts. I saw this as a safety concern. In 2020 I changed my personal email.
16. As of the date of writing this statement none of my, or my wife's former employers, family or family friends whom I am still in contact with have been contacted by the Cullen Commission inquiring about my whereabouts.

Evidence of Character

17. Mr. Daryl TOTTENHAM, a former BCLC colleague and current BCLC employee has stated in evidence he believed I had mental health issues in 2017. Attached is a letter (**Exhibit E**) from my General Practitioner from 2008-2018 regarding that defamatory statement. Any reference I made in correspondence to health issues in 2017 were primarily related to a serious neck injury sustained in September 2017 which involved months of ongoing treatment including for nerve pain.
18. Furthermore Mr. TOTTENHAM states that on December 27, 2017 at a lunch meeting at the Cactus Club between the two of us I suggested I was disgruntled and wanted certain BCLC executives fired inferring this was part of my motivation for talking to the media, specifically Mr. Sam COOPER. This is absolutely false. I support the work many at BCLC do. My feedback to the German Report in 2018, which I provided to the Cullen Commission, confirms that.
19. I have attached email exchanges between myself and Mr. TOTTENHAM between December 21, 2017, and July 8, 2018. (**Exhibits F, G, H and I**) In the email marked **Exhibit H** which was written the day after the lunch meeting where Mr Tottenham makes these allegations, he writes to set up another lunch with me. (Underlined in exhibit)



[Handwritten signature]
WITNESS

[Handwritten signature]
[unclear]

20. Furthermore, I had a chance and friendly meeting with Mr. TOTTENHAM (with my family present) at New Westminster Quay in the summer of 2018. This correspondence and my meeting with him are not consistent with his testimony at the Cullen Commission in late 2020. These emails originated from his government email account, yet these allegations were never probed at the Cullen Commission. Instead Mr TOTTENHAM's unchallenged claims were published in the Vancouver Sun on November 12, 2020 in an article titled **"Key casino whistleblower had 'breakdown,' money laundering commission told"** Of note in the same article it is stated **"Alderson resigned in December of 2017"** I believe the release of that article was prior to the Cullen Commission publishing exhibit 499.
21. I had several social interactions with BCLC employees throughout late 2017 and 2018. In August of 2018 my family stayed for several days at Kevin SWEENEY's house in Kamloops. Mr. SWEENEY is a Director at BCLC. He is responsible for Cyber Security and Privacy among other compliance oversight. I received support from several former colleagues after I contributed to W5 in February 2019. It is unrealistic, considering the very public coverage during late 2017 and 2018, that my role and motivations in talking to Mr. COOPER were not discussed with my former colleagues and I find it very disappointing that many now cannot recall such discussions.
22. On February 4, 2021 I was described during evidence in the inquiry as a person of bad character, by a lawyer representing Great Canadian Casinos. This is the same Gambling corporation whose CEO in January of 2021 flew to a remote First Nations Community and defrauded vulnerable persons of a covid vaccine. Rod Baker was forced to resign amid global condemnation.

Security Breach Allegations

23. In 2017 I had information from BCLC on my personal computer. I admitted this to BCLC and accepted that it was in breach of their policy. In 2017 I voluntarily provided my personal computer to BCLC including providing the details of the exact files I shared with Sam COOPER. I provided confirmation I had deleted all the BCLC files. I also shared similar information with Richmond RCMP in late 2017 when my family and I were placed on an emergency response list for safety reasons.
24. I have not had access to any of my BCLC notes, emails or files since 2017 except by freedom of Information requests.
25. I was informed by Mr. Kevin SWEENEY in 2018 that a privacy impact assessment (PIA) was completed by BCLC based on the information I provided to Mr. COOPER and the PIA found no privacy violations had taken place. I have never been contacted by the Privacy Commissioners office, never been criminally charged, nor to the best of my knowledge been investigated, for any criminal offence during my 12 years living in Canada. Allegations at the inquiry by Mr. Daryl TOTTENHAM and by the BC Civil Liberties Association of *"theft of information"* and a *"Huge" and "major security breach"* are baseless and sensationalist in nature.

Meeting Allegation.

26. It has been alleged in evidence provided to the Cullen Commission by both Ms. Bai BAMRA and Mr. Daryl TOTTENHAM that I essentially fabricated a meeting where a former supervisor made inappropriate comments regarding AML procedures. To the best of my knowledge both Mr. TOTTENHAM and Ms. BAMRA are currently employed by BCLC. Ms. BAMRA's husband is also employed by BCLC and has a close friendship with Mr. James LIGHTBODY. I informed the Gaming Policy Enforcement Branch (GPEB) several times in 2019 and the Cullen Commission on March 2, 2020 of specific details regarding that meeting, including why I chose to make the complaint anonymously. I stated I was prepared to take a polygraph test: multiple times. I stand by the evidence I provided to GPEB regarding that meeting then, and I stand by it now.



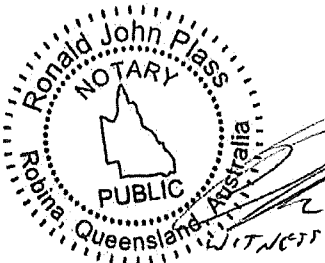
27. That 2019 GPEB investigation included reviewing key documents in the control and possession of BCLC. The investigation concluded that there was no evidence of the supervisor's comments taking place. However, the investigation did not include my BCLC notebook from March 2017 onwards. This was never mentioned, nor probed in evidence at the Cullen Commission.

"W5" Allegation

28. It was alleged by Mr. James LIGHTBODY's lawyer Robin McFee QC on October 18, 2019 and later in evidence by Mr. LIGHTBODY that it was LIGHTBODY's position that I "was free to talk publicly." In summary he stated that what I said in my interview on CTV's W5 "The Laundromat" in February 2019 "was untrue."
29. Several of BCLC's own employees have now corroborated under oath much of what I said on W5 "The Laundromat" in February 2019 particularly regarding a 2012 meeting with Terry TOWNS. It is also now an undeniable fact that BCLC did not have a formal cash conditions program involving player interviews until 2015. I have attached **Exhibits K, L, M, N, O, P and Q** showing clear evidence of BCLC's AML changing chronology in 2019 leading up to the Cullen Commission. These exhibits, including mostly screen shots from BCLC.com were provided to the Cullen Commission on February 11, 2020 as detailed per bottom of page 1 on **Exhibit B**.
30. I participated in an interview on CTV's W5 because like the overwhelming majority of the adult population in British Columbia I wanted a public inquiry. Between my resignation and my interview on W5 I declined numerous media interviews. As of this date I have not asked for, neither have I been paid for any media, or media related work, nor have I retained or sold any information belonging to BCLC.
31. Some of the leadership team at BCLC may have not liked how they were portrayed on W5 and blame me, but the producers of that show came to their own conclusions based on their own research and from conducting multiple interviews. The same applies to other media reports.

Freedom of Speech

32. On January 29, 2021 the Vancouver Sun published an article titled "**David Eby's ties to whistleblower questioned by BCLC boss**" Mr. LIGHTBODY referencing myself was quoted, "**We wanted to make it clear to him (in the letter) that he was free to talk to the media, we just wanted him to be accurate in his remarks.**"
33. On March 2, 2018 I received a phone call from Herb ISHERWOOD, one of BCLC's external lawyers. He called me to advise me that the RCMP wanted to talk to me about what I knew about potential leaks within their ranks. He informed me I had an ongoing obligation to BCLC and therefore could not discuss anything else except the topic at hand. I contested that. He followed up with an email which I have attached (**Exhibit J**) The phone call and the email was sent to me months after leaving BCLC's employment. I took this as a direct threat to keep my mouth shut about BCLC. I provided that email to the Cullen Commission in 2020.
34. During the phone call Mr. ISHERWOOD also queried the content of a confidential email I had sent addressed to the BC Attorney General David EBY in February of 2018. At that time the Peter GERMAN casino review was underway. However, Mr. EBY's office shared that information with BCLC. (**Exhibit S**) I believed this to be so unethical I lodged an ombudsperson complaint. I believed at that time that I was up against a system.
35. In response to the January 29, 2021 Vancouver Sun article and Mr. LIGHTBODY's allegations I have never met Mr. EBY in person, nor have I ever spoken to him by phone or otherwise.

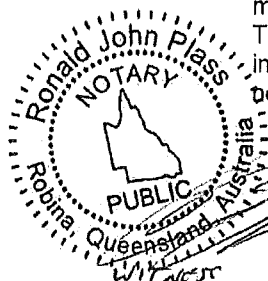


Cullen Commission

36. I moved to Australia for the safety and well-being of my family who remain my primary focus. I made it clear to the Cullen Commission in early 2020 I wanted to move on with my life and they appeared supportive. I went out of my way to provide the Cullen Commission with as much information as possible before I left.
37. I live and work in Australia. Due to work commitments, the time difference and my current living arrangements it is entirely impractical to participate in the inquiry either in person or via video link. I am currently a casual employee working shift work with no paid medical, holiday or any other leave. I am currently rostered on 6 days a week due to resourcing issues. I do not have the finances to engage a lawyer to represent me in this inquiry and furthermore there are no lawyers in Australia familiar enough with the inquiry.
38. I have little faith in the legal system in Canada for many of the reasons I have already outlined. I requested participation in 2019 and was informed that would not be required. In and around late 2019, early 2020 Mr. Paul JAFFE a lawyer from Vancouver met with Commission Counsel and proposed he represent both Mr. Fred PINNOCK and myself as participants. That proposal was denied.
39. The public has still not heard key evidence from gamblers interviewed by BCLC. Some of them admitted in those interviews that they received their funds in highly suspicious circumstances. These are the interviews I recommended the Cullen Commission obtain in October 2019 and they are the same interviews the industry tried to withhold from the Cullen Commission in 2020.
40. The public has not heard evidence from a GPEB investigator who has shared their regulatory experience in September 2019 as nothing more than paying lip service to service providers. The Cullen Commission has that email too. **Exhibit R**
41. The public has not heard from key Politicians, Bureaucrats and Enforcement figures who made key decisions detrimental to the public, particularly to those of British Columbia.

Summary

42. I went to a person I trusted in the media because I believed that was the only route to get the story out whilst guaranteeing mine and my family's personal safety. It was a huge decision and not one done out of any petty personal spite, personal gain or because of my unstable mental state. It was out of social conscience and my disgust at the amount and scope of criminal behaviour I observed occurring. The impact it was having on the community, and the links I observed with organised crime, local politicians, and the Chinese Communist Party. I was upset with the inability or unwillingness to address and prosecute widespread criminality, and the governments appeasement toward an authoritarian dictatorship.
43. It should be publicly noted that in this inquiry Politicians, Government Officials, Enforcement Agencies, Corporate Entities and a convicted criminal are allowed free legal representation and participation paid for by the Canadian taxpayer. Whistle blowers are offered no such protection which highlights the lack of interest in actually getting to the truth.
44. If in Commissioner Cullen's findings he believes I have done something wrong, then so be it and I will deal with that when the time comes. The negative circumstantial evidence related to me pales in comparison to the documentary evidence which shows my positive actions over many years and my conscience is clear.
45. The fact is the Cullen Commission was fully aware of my intended move to Australia and my reasons. The Commission has taken no action to quell the misinformation in a number of media releases. In the case of exhibits 499 and 573 this is misinformation by their making. They have allowed the tainting and attempted destruction of the reputation of the person who instigated this inquiry and the ludicrous public claims of a "witness gone missing". Willingly or not, it is incredibly dishonest, hurtful, has possibly increased safety concerns and is



destructive to my future employment aspirations, considering these media articles are found readily on the internet.

46. There is no money laundering inquiry without my disclosure to Sam Cooper. Many people know it, including those who wish me harm.
47. On March 9, 2021 my father-in-law, a man who I loved and admired greatly, died suddenly at his home. This is the same day that the BIV article subject to this affidavit was released. I do not know if he read that article that morning before he died. I do know he followed it all religiously and if he had read that story how greatly it would have upset him. He was a great man, who loved his family and it hurt him deeply that we were forced to move to Australia due to the constant threat against me and my family and the lack of career opportunities coming forward as a whistle blower afforded me. I know that the failure of this inquiry allowing refutable lies and untruths aimed at tearing my reputation to pieces had taken a toll on him. He was one of my best friends, a man of strong moral character, my biggest supporter and a proud Canadian. Rather than properly grieve with my family I have unfortunately felt compelled to address attacks on myself and by extension my family. I owe this to my father-in-law, my family, the Canadian public, and to the credibility of this Commission to set the record straight.

Sworn ~~(or Affirmed)~~ by Ross ALDERSON
AT GOLD COAST, QUEENSLAND,
AUSTRALIA THIS 19TH DAY OF
MARCH, 2021 IN THE PRESENCE OF:

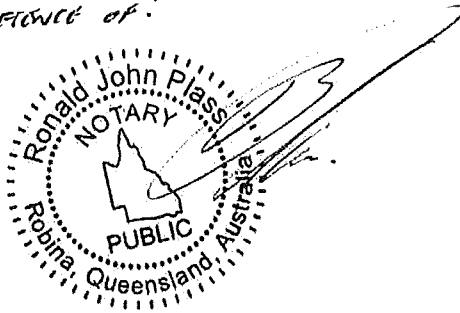
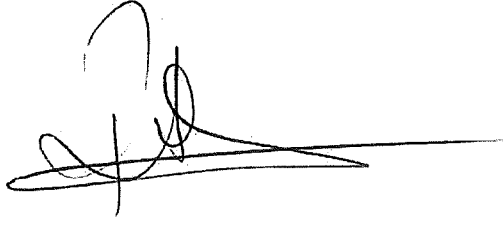


Exhibit A.

[Redacted]

[Redacted]

Gmail

Ross Alderson [Redacted]

LT R Alderson re resignation

Isherwood, Herb [Redacted]
To: [Redacted]
Cc: "Jim D. Lightbody" <[Redacted]>, "Jamie Callahan" ([Redacted])

Sun, Dec 17, 2017 at 9:54 AM

Mr. Alderson,

Further to our meeting yesterday please find attached our letter setting out the terms of resolution and the mutual release.

Please let me know if you have any questions.


Herb

Law around the world
nortonrosefulbright.com

Bull Houser has combined with Norton Rose Fulbright effective January 1, 2017. Please update your records accordingly.

CONFIDENTIALITY NOTICE: This email is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately and delete it.

2 attachments

 **LT R Alderson re resignation.pdf**
138K

 **MUTUAL RELEASE.docx**
21K

[Redacted footer line]

[Handwritten signature]

Exhibit B



M Gmail

Ross Alderson 

Untitled

Ross Alderson 

To: "McGowan, Patrick CC:EX" 

Cc: "Latimer, Alison CC:EX" , "McCleery, Kyle A CC:EX" 

Tue, Feb 11, 2020 at 5:30 AM

Good morning Mr. McGowan,

As I outlined in our meeting last year my wish was to assist as much as I could in the inquiry. I am aware that you have now gathered substantial background information, including on the casino industry and have likely pieced much together as to how BC got to where it is today.

I wanted to also reach out at this time as I am planning on leaving BC and Canada next month. Therefore in case there is not another opportunity to speak in person with you I wanted to pass on some further information which I hope may be of some use to you and your team.

1. There are quite a few interesting documents available on BCLC.com which have been previously obtained through Freedom of Information requests. Some are heavily redacted however here is the link.

https://corporate.bclc.com/who-we-are/corporate-reports/corporate-reports-search.html?filter_category=freedom%20of%20information%20request%20responses

2. I have consolidated some of the information I obtained from a number of the FOI responses on that webpage and placed into a document named "Summary of FOI." I have attached that file to this email.

Pieces that may be of interest to your team.

Page 1: (bullet point 4) It was noted in BCLC correspondence (I think this became an information note) that "in Nov 2015 BCLC became aware" that there was a \$50K threshold at River Rock. For background essentially no SINGLE cash buy in under \$50K was deemed or reported as suspicious.

Page 2 (p. 5:) actually confirms I personally raised the \$50 K threshold issue in Sept 2011 (actually Sep 23, 2011). The piece that is redacted is that through looking at buy ins I came across a patron at the RRCR who bought in for \$49,960 and \$49,980 (I believe it was all in \$20's) within a 24 hr period. Neither buy in was deemed suspicious by GCGC.

My email also outlined my concerns the player may have been counselled by someone to buy in under the \$50K threshold to avoid a STR. I raised a similar issue again in Feb 2012 (p.3:) Both emails were sent to BCLC Security management. These emails I obtained last year in an FOI request (19-048 which I have also attached)

This confirms multiple people at BCLC knew of the threshold and yet nothing was done to address this by management for over 4 years. It also means neither Fintrac or GPEB picked up on it. I left the River Rock in March 2012. When I became Director for AML at BCLC in April/May 2015 I assumed it had been addressed, however one of my staff came across the issue in Nov 2015 and it was at that time that BCLC reported it to FINTRAC. I feel the Dirty Money report played it down as a "mixup" (page 2 of the document) but as you can see by the emails I essentially point out to management that (BCLC) is not in compliance with fintrac not to mention my integrity concerns.

Pages 4-7 show an internal BCLC AML chronology document that was widely used by BCLC. BCLC.com has recently revised most of the action taken in the years prior to 2015. I assume in anticipation of the inquiry.

Pages 8-13 detail the content in the BC Govt FOI released to Cooper in 2017

Page 13- 21 emails between BCLC and GPEB



RA

[REDACTED]

3. I have put together a timeline of events leading up to the commission of the German Report

Early 2017 Sam Cooper submits FOI on gaming industry. It will eventually also include MNP report as well as other damning reports.

Aug 2017 - I tip off Cooper to a NOC re: Sidaway Road, Richmond address

Aug 18 Cooper runs VC article re: above titled: "B.C. government trying to seize Richmond mansion claiming it was used for violent crime and money laundering"

Sept 12 - Cooper and I meet in Victoria. Around Sept 14,15 I share information with him. Shortly after Cooper starts reaching out to govt for info and has a phone conversation with David Eby around the release of the MNP report. At this time Cooper tells Eby he has industry sources and knows about Paul Jin.

Sept 20 - 1759 hrs Bud Smith email re MNP release. Flurry of emails from BCLC and Ministry

Sept 21 - 0800 hrs BCLC teleconference call with AG. Later than day emails exchanged between AG, BCLC and GPEB

Sept 22 - Govt releases MNP report publicly and announces a review coming up shortly.

Sept 25 - AG holds briefing with AG, GPEB and JIGIT (document attached)

Sept 28 - German announced as reviewer. Some time after this the AG was advised of German's potential conflicts of interest by a former Solicitor General and Chief of Police in relation to IGET and others.

Dec 1 - (Van sun story) AG states "he will never forget his first meeting with the gaming enforcement branch when he became AG "last summer"....."get ready we are going to blow your mind"

The actions between Sept 20 and 28 support my belief that the initial German review was primarily a response to the release of the MNP report to Cooper and many of the subsequent findings of that report were as a result of what was being released in the media through 2017 and 2018.

[REDACTED]

[REDACTED]

[REDACTED]

Lastly, the primary reason my family is moving because of the negative impact to our lives and by extension those of my extended family and friends. I have been unable to find meaningful employment in this province so to support my family I need to leave. I have to leave behind 11 years in this country in large part due to the actions taken against me by government and its officials who did not want their dirty secret out and only did so after incredible media and public pressure which I was the catalyst. These are the people who directly or indirectly benefited from dirty money or did nothing to stop it and would like nothing more to destroy my reputation. I have already experienced it.

[REDACTED]

RA

[REDACTED]

[REDACTED]

Mr McGowan, I believe you probably have a fairly good grasp on the depth of money laundering on this province and who the bad actors are. I wish you well in your endeavours. I am still prepared to be an inquiry witness if required and it is logistically possible.

Regards

Ross Alderson

4 attachments

 [REDACTED]

 [REDACTED]

 [REDACTED]

 [REDACTED]

[REDACTED]





RA

Exhibit C

 
Gmail

Ross Alderson 

Untitled

McCleery, Kyle A CC:EX  Wed, Feb 19, 2020 at 9:24 AM
To: Ross Alderson , "McGowan, Patrick CC:EX" 
Cc: "Latimer, Alison CC:EX" 

Dear Mr. Alderson,

Thank you for your email!

In light of your plans to leave the country, we would like to find a time to meet with you again before your departure.

Please let us know the date of your move and some times that you could conveniently meet with us before then and we will endeavour to find a mutually convenient time.

Sincerely,

Kyle McCleery

Email: @cullencommission.ca

Direct: 

Cullen Commission of Inquiry into Money Laundering in BC

PO Box 10073
Suite 601 – 700 West Georgia Street
Vancouver, BC V7Y 1B6
Toll Free: 1-855-788-3661
Facsimile: 604-669-1207
info@cullencommission.ca

The information in this message is intended solely for the addressee(s). It is confidential and/or protected by legal privilege. If you receive it in error, please tell me immediately and destroy all copies. Thank you.

[Quoted text hidden]





Exhibit D

 
M Gmail

Ross Alderson 

Untitled

McCleery, Kyle A CC:EX @cullencommission.ca>

To: Ross Alderson 

Cc: "McGowan, Patrick CC:EX" , "Latimer, Alison CC:EX"

Sat, Feb 29, 2020 at 4:23 AM

Ross,

As discussed on the phone last week, please find attached a summons for our meeting on Monday.

As you'll see, we've drafted the summons very broadly. Because you're leaving the country shortly, we would like to make sure that we get everything you have before you go, so we've cast a very wide net to ensure that there are no legal or other impediments to your providing us any records you have or discussing with us any of your knowledge or experience with matters relevant to the Commission's work.

As we discussed on the phone, we can do the work of sifting through the records you have to determine what is relevant and useful, so there's no need for you to put any thought into that during what I'm sure is a busy and stressful time preparing for a big move, just bring us what you have and we'll figure it out from there.

Thanks again for all of your assistance so far – we're looking forward to seeing you again on Monday.

Kyle

Kyle McCleery

Email: 

Direct: 

Cullen Commission of Inquiry into Money Laundering in BC

PO Box 10073

Suite 601 – 700 West Georgia Street

Vancouver, BC V7Y 1B6

Toll Free: 1-855-788-3661

Facsimile: 604-669-1207

info@cullencommission.ca



Exhibit E

Gary M. Koss M.D., M.Sc., B.Sc.

[REDACTED], B.C.

e-mail: [REDACTED]

December 3, 2020

To Whom It May Concern:

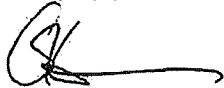
RE: Ross Adlerson
D.O.B.: February 18, 1971

I was Ross Alderson's Family Physician from 2008 to 2018. I retired in 2018. My practice was located at 120-6180 Blundell Road, Richmond, B.C., V7C 3K9. The above is my retirement address.

During the time that Mr. Alderson was my patient, I saw him for mainly sport related injuries. At no time did I see him for mental health reasons.

If you have any further questions, please do not hesitate to contact me.

Sincerely yours,



Gary M. Koss M.D.



Exhibit F




M Gmail

Ross Alderson 

Resignation

Daryl Tottenham 

To: Ross Alderson 

Thu, Dec 21, 2017 at 9:40 AM

Hi Ross

There is no other way to say this....this frickin sucks! You did a great job in here and for BCLC and we could not ask for a better boss to work for. I was hopeful you would be back but as the days passed, it became clear that something was not right.

We need to get together for lunch, Bal has sent you an invite, and we can chat more. If there is anything I can do to help you and your family in any way, just say the word. I don't have a number for you as the one I tried last month was not in service.....we kind of broke the rules trying to reach out to you, had a good plan and then got a recording...it was de-moralizing....

Not sure if you are headed back to NZ but if you are, would really like to meet up before you go if possible.

Will wait to hear back from you.

Daryl

Daryl Tottenham BA, CAMS

Manager, AML Programs

Legal, Compliance & Security Division

2940 Virtual Way, Vancouver, BC V5M 0A6






@bclc.com

• Yes, and...•

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

From: Ross Alderson []

Sent: Thursday, December 21, 2017 9:23 AM

To: Kris Gade <>; Bal Bamra <>; Daryl Tottenham 



1/2



Gmail - Lunch Dec 27

Dear Bal, Daryl and Kris,

I am emailing you to notify you that I have resigned from BCLC.

Apparently, it was announced today internally anyway which was not my preference on how it was to be delivered to you..

As you know I have been absent for several months now during what has clearly been a difficult time for the industry, and all those involved.

I want you all to know that I have missed you all, but now its time for the next exciting phase of my life.

I could not have asked for a better management team and it was always the great folks of the AML and Investigations departments, and you guys in particular, who made me want to come to work every day. Unfortunately other factors eventually took their toll and I am sorry I let you down in that regard.

Continue doing what you do best with the strength, ability, compassion and integrity that you all bring to the job and you will continue to be successful.

Thank you for letting me share the laughs..... and the occasional JDLR moments

Please pass on my best to all the others, even Bill:)

It was my honor to be part of your teams.

Have a great Christmas and New Years with your families

I am open to contact on this email address

Regards

Ross

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






Exhibit G

 
M Gmail

Ross Alderson 

Lunch Dec 27

Bal Bamra 
To: Ross Alderson 
Cc: Daryl Tottenham 

Thu, Dec 21, 2017 at 3:34 PM

Hi Ross,

We are meeting Dec 27 at 11:00 am at Cactus Club: 7320 Market Crossing, Burnaby.

See you then!

Thanks,

Bal Bamra B.Com, CAMS
Manager, AML Intelligence
Legal, Compliance & Security Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6


◊ Yes, and... ◊

bbamra@bclc.com

Connect with us:

Twitter @BCLC | Facebook BCCasinos | Blog | bclc.com

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






From: Ross Alderson [mailto:
Sent: December-21-17 9:23 AM
To: Kris Gad ; Bal Bamra ; Daryl Tottenham 
Cc: Kevin Sweeney 
Subject: Resignation




Exhibit H.

Gmail - Fwd: Follow up to Nov 29 meeting -CONFIDENTIAL


M Gmail

Ross Alderson 

Fwd: Follow up to Nov 29 meeting -CONFIDENTIAL

Daryl Tottenham 
To: Ross Alderson 

Thu, Dec 28, 2017 at 9:04 AM

Thanks Ross,

As expected you have some really strong and valid points here that, if acted on, would go a long way to resolve many of our current problems and put responsibility on those that should be accountable.

I know that Pete has indicated that his main focal points are relationships, sticking points and accountability and I am hoping that GPEB is on the top of his list as if change is going to occur, it is basically now or never. He does not seem to be looking too deep into our programs although we have provided him a boatload of materials however many of the things you have listed are things that are in progress as you started them and we are continuing to drive them.

Just to show you how ridiculous things are right now, the recommendation that Pete has already put out (10K SOF reporting and GPEB on-site 24-7 in the major sites) is being delayed by GPEB! I had the changes drafted and ready to roll in 4 days for the 10K reporting and they have now come forward and advised us that we cannot change or put out ANY directive without their authorization and have stopped the process in its tracks with red tape!! Not sure if they forgot the last 5 directives we put out that they were silent on but suddenly they have a need to "be relevant" in the process.....

In the same breath they have asked us to provide the analytics for how busy the big 5 sites are so they can figure out a way to weasel out of having their guys on-site 24-7!!! Now they want to meet to provide feedback and a plan for response to Govt why they should be held to that schedule!! Its not even our issue and once again we are doing the work, they will put it under their letterhead and send it to Pete and his group! That organization is seriously dysfunctional and redundant in so many ways yet they continue to roll along un-challenged.

Will keep this document if you don't mind but will not share it as requested. Once Bal and you are back we will hook up for lunch in January.

Thx D

Daryl Tottenham Ba, CAMS

Manager, AML Programs

Legal, Compliance & Security Division

2940 Virtual Way, Vancouver, BC V5M 0A6




•Yes, and...•




Exhibit I

Gmail - Hi

 Gmail

Ross Alderson 

Hi



Daryl Tottenham 
To: Ross Alderson 

Sun, Jul 8, 2018 at 4:57 PM

Hi Ross,


Yes, not much to from my perspective. We have already covered off our points so business as usual for my team.
Hope you and your family are doing well and have a good summer.

Cheers, D

From: Ross Alderson 
Sent: Thursday, June 28, 2018 10:24 PM
To: Daryl Tottenham 
Subject: Hi

Hi mate,

Hope you are doing ok. The report is pretty scathing and in parts not particularly objective or fair on bclc. That's a shame.
Anyway take care and give my regards to the team



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



Exhibit J

 
M Gmail

Ross Alderson 

RCMP inquiry
2 messages

Isherwood, Herb 
To: Ross Alderson 

Fri, Mar 2, 2018 at 11:59 AM

Ross,

Further to our discussion this morning, I provided Corporal Jillian Wellard with your phone number and told her that she can call you next Thursday. I indicated that you would think about whether you will talk to her between now and then.

I also confirm that you are authorized by BCLC to discuss with Corp Wellard any information you have about what Sam Cooper told you about possible leaks within the RCMP or GPEB. The authorization is limited to this scope.

Please let me know if you have any questions.

Herb Isherwood*

Partner

Norton Rose Fulbright Canada LLP / S.E.N.C.R.L., s.r.l.

1800 - 510 West Georgia Street, Vancouver, BC V6B 0M3 Canada

 | F: +1 604.646.2636



*Law Corporation

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

Bull Housser has combined with Norton Rose Fulbright effective January 1, 2017. Please update your records accordingly.

CONFIDENTIALITY NOTICE: This email is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately and delete it.

Ross Alderson 
To: 





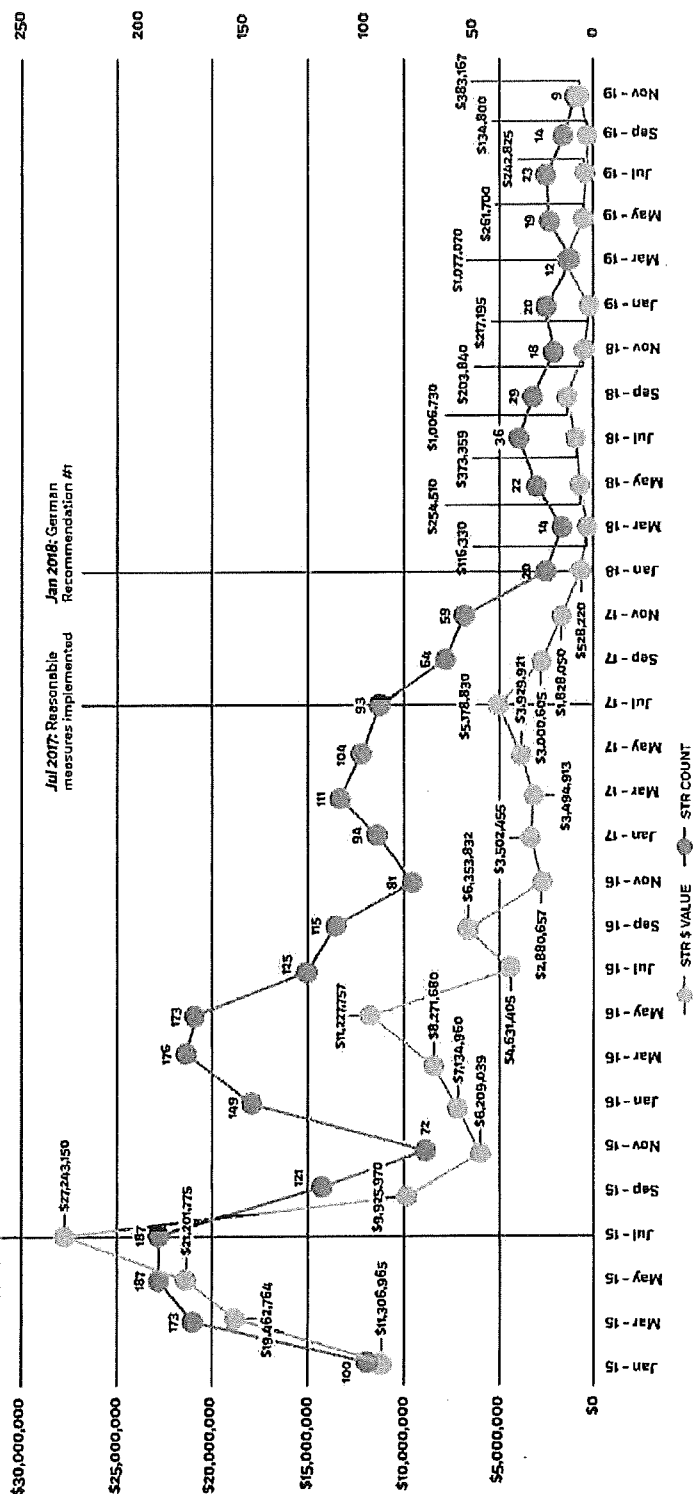


EXHIBIT K

Casino Suspicious Transaction Reports - Value & Count January 2015 - November 2019

*BCLC data as reported to FIMTrac

Jul/Aug 2015: Source of Funds requirements implemented



RA

EXHIBIT L

5/22/2019

BCLC's Anti-Money Laundering Program Chronology



[Who We Are](#) [What We Do](#) [Social Responsibility](#) [Careers](#) [Media Centre](#) [Customer Support](#)

What We Do

- Casinos
- Lotto
- Online Gambling
- Gambling Rules & Regulations
- Doing Business With Us
- Current Projects
- Compliance Commitment
- Innovation @ BCLC
- Security and Anti-Money Laundering
 - BCLC's Anti-Money Laundering Program
 - Anti-Money Laundering Roles & Responsibilities
 - Updates: Protecting Casinos from Money Laundering
 - Suspicious Transaction Reports
 - BCLC's Anti-Money Laundering Actions
 - BCLC - Police Collaboration

Thanks to our players, billions of dollars have supported communities and help B.C. grow.

[Learn more](#)

Social Responsibility

BCLC wants to encourage conversation with our stakeholders so that we can learn what's important to British Columbians, and respond to their needs.

BCLC's Anti-Money Laundering Actions

BCLC has continued to improve its anti-money laundering (AML) controls as part of our ongoing effort to safeguard B.C. casinos from illegal activity. Below is a chronology of key actions from 2012 to current:

Encouraged Use of Non-Cash Transactions

With the exception of one pilot, BCLC was permitted to take only cash from customers prior to June 2012.

June 2012: BCLC implemented policy changes to encourage the use of non-cash transactions to reduce the flow of large amounts of cash in casinos. This included allowing B.C. casinos to offer Patron Gaming Fund (PGF) accounts.

A PGF account is for gaming-use specifically and exists to facilitate gaming play – not to provide financial services typically offered through personal bank accounts. PGFs allow players to transfer money between their PGF account and their approved bank account (as defined by the Office of the Superintendent of Financial Institutions), eliminating the need to bring cash into a casino. Transactions are traceable.

October 2012: BCLC identified and barred an individual suspected of having links to criminal activity and providing off-site cash deliveries.

New Dedicated Anti-Money Laundering Unit

September 2013: BCLC created a dedicated Anti-Money Laundering (AML) Unit, which ensures BCLC's compliance with AML regulations and guidelines, and conducts intelligence gathering and analysis. At this time, BCLC required employees working in the AML Unit to acquire Association of Certified Anti-Money Laundering Specialist (ACAMS) professional certification, believed to be the first requirement of its kind in the industry.

Ongoing reporting of Suspicious Transactions

February 2014: BCLC implemented a program to monitor players and transactions on an ongoing basis. Where concerns arise in relation to a player or transactions, BCLC reports those players and transactions to police, the gambling regulator and FINTRAC.

April 2014: BCLC met with the Combined Forces Special Enforcement Unit of the RCMP and requested police assistance regarding increased large-cash transactions and suspected illegal activities.

June 2014: BCLC established an Information Sharing Agreement with police to support BCLC in identifying and proactively banning individuals from B.C. casinos who are suspected of criminal activity, believed to be a public safety risk or members of organized crime groups.

July 2014: BCLC supplied to police a list of Top 10 suspected cash facilitators associated with another individual linked to organized crime.

November 2014: BCLC presented a proposal to the Combined Forces Special Enforcement Unit of the RCMP to investigate individuals suspected to be engaging in criminal activity in proximity to casinos.

Requirements for Players to Disclose Source of Funds

February 2015: BCLC requested that the RCMP's Federal Serious and Organized Crime unit initiate an investigation based on information that BCLC had collected related to cash drops at casinos by an individual believed to be associated to organized crime. Shortly thereafter, the RCMP launched its "E-Pirate" multinational money laundering investigation.

Related Links

- [Gaming Control Act](#)
- [Gaming Policy and Enforcement Branch](#)

April 2015: BCLC began placing certain players on sourced-cash conditions, meaning that they could not play with cash unless they could disclose the source of their buy-in funds. In summer 2015, BCLC further revised and extended its source of funds program (which was expanded on in January 2018), intended to protect casinos from criminal proceeds, and continued to place players on the cash conditions. Since 2015, we have placed these conditions on more than 520 players.

New Protocol Introduced to Help Safeguard Casinos

January 2016: BCLC replaced the series of \$5,000 denomination casino chips at River Rock, rendering the prior chips worthless, thereby reducing the potential for individuals to use them for illicit purposes.

October 2016: BCLC established a protocol to ensure that players are unable to attend a casino and attempt to buy-in with cash that another B.C. casino has already declined, unless authorized by BCLC's AML Unit following its review of the circumstances.

Implementation of Reasonable Measures Process

June 2017: BCLC implemented a Reasonable Measures process that requires casino operators to complete enhanced due diligence in determining and documenting the ownership of funds for all cash buy-ins, disbursements and foreign exchange transactions of \$10,000 or more within a static 24-hour period.

Enhanced Source of Funds Requirements

January 2018: BCLC implemented Dr. Peter German's first interim recommendation, by expanding Source of Funds procedures in B.C. casinos. All casino operators must complete a Source of Funds Declaration for all cash and bank draft/certified cheque forms of buy-ins of \$10,000 or more, which includes recording detailed information about where the player sourced funds before the player is allowed to buy-in. In addition to the interim recommendation, BCLC implemented a requirement for all players to provide an original receipt from a financial institution, as proof of source of funds.

March 2018: BCLC implemented a policy that prohibited casinos from taking any form of payment from a Money Service Business.

June 2018: The Ministry of the Attorney General released an independent report of anti-money laundering policies and practices in B.C. casinos. The report identified 48 recommendations to improve anti-money laundering controls.

German Recommendations Progress

January 2019: BCLC continues to work with the Province to implement recommendations from the independent review. As of February 2019, 11 recommendations have been completed.

Last Updated: April 05, 2019

EXHIBIT M

BCLC's Anti-Money Laundering Actions

BCLC has continued to improve its anti-money laundering (AML) controls as part of our ongoing efforts to safeguard B.C. casinos from illegal activity. Below is a chronology of key actions from 2012 to current:

June 2012: Encouraged Use of Non-Cash Transactions

BCLC implemented policy changes to encourage the use of non-cash transactions to reduce the flow of large amounts of cash in casinos. This included allowing B.C. casinos to offer Patron Gaming Fund (PGF) accounts.

A PGF account is for gaming-use specifically and exists to facilitate gaming play – not to provide financial services typically offered through personal bank accounts. PGFs allow players to transfer money between their PGF account and their approved bank account (as defined by the Office of the Superintendent of Financial Institutions), eliminating the need to bring cash into a casino. Transactions are traceable.

October 2012: Began Barring Individuals Suspected Of Having Links To Criminal Activity

BCLC identified and barred an individual suspected of having links to criminal activity and providing off-site cash deliveries.

October 2013: New Dedicated Anti-Money Laundering Unit Created

BCLC created a dedicated Anti-Money Laundering (AML) Unit, which ensures BCLC's compliance with AML regulations and guidelines, and conducts intelligence gathering and analysis. At this time, BCLC required employees working in the AML Unit to acquire Association of Certified Anti-Money Laundering Specialist (ACAMS) professional certification, believed to be the first requirement of its kind in the industry.

March 2014: Established Information Sharing Agreement with Police

BCLC established an Information Sharing Agreement with police to support BCLC in identifying and proactively banning individuals from B.C. casinos who are suspected of criminal activity, believed to be a public safety risk or members of organized crime groups.



April 2014: Requested Police Assistance Regarding Suspicious Activities

BCLC met with the Combined Forces Special Enforcement Unit of the RCMP and requested police assistance regarding increased large-cash transactions and suspected illegal activities.

June and November 2014: Proposed the RCMP Investigate Suspicious Individuals Near Casinos

BCLC presented a proposal to the Combined Forces Special Enforcement Unit of the RCMP to investigate individuals suspected to be engaging in criminal activity in proximity to casinos.

July 2014: Provided Police with List of Suspects

BCLC supplied to police a list of Top 10 suspected cash facilitators associated with another individual linked to organized crime.

February 2015: Requested the RCMP Initiate An Investigation on Cash Drops

BCLC requested that the RCMP's Federal Serious and Organized Crime unit initiate an investigation based on information that BCLC had collected related to cash drops at casinos by an individual believed to be associated to organized crime. Shortly thereafter, the RCMP launched its "E-Pirate" multinational money laundering investigation.

April 2015: Requirements for Players to Disclose Source of Funds

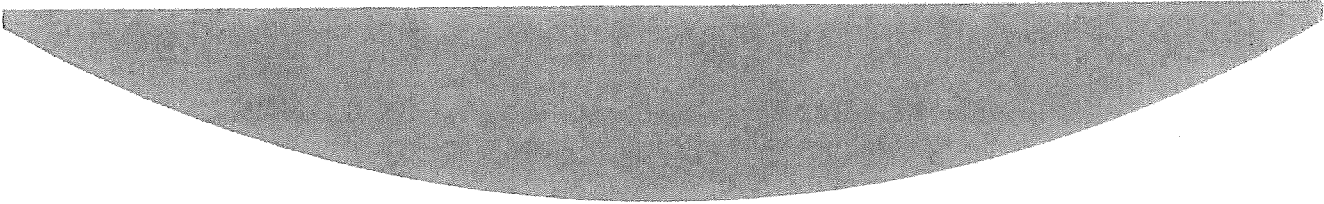
BCLC began placing certain players on sourced-cash conditions, meaning that they could not play with cash unless they could disclose the source of their buy-in funds. In summer 2015, BCLC further revised and extended its source of funds program (which was expanded on in January 2018), intended to protect casinos from criminal proceeds, and continued to place players on the cash conditions. Since 2015, we have placed these conditions on more than 600 players.

January 2016: Replaced Casino Chips at River Rock Casino

BCLC replaced the series of \$5,000 denomination casino chips at River Rock, rendering the prior chips worthless, thereby reducing the potential for individuals to use them for illicit purposes.

October 2016: New Protocols Introduced to Help Safeguard Casinos

BCLC established a protocol to ensure that players are unable to attend a casino and attempt to buy-in with cash that another B.C. casino has already declined, unless authorized by BCLC's AML Unit following its review of the circumstances.



June 2017: Implementation of Reasonable Measures Process

BCLC implemented a Reasonable Measures process that requires casino operators to complete enhanced due diligence in determining and documenting the ownership of funds for all cash buy-ins, disbursements and foreign exchange transactions of \$10,000 or more within a static 24-hour period.

January 2018: Enhanced Source of Funds Requirements

BCLC implemented Dr. Peter German's first interim recommendation, by expanding Source of Funds procedures in B.C. casinos. All casino operators must complete a Source of Funds Declaration for all cash and bank draft/certified cheque forms of buy-ins of \$10,000 or more, which includes recording detailed information about where the player sourced funds before the player is allowed to buy-in. In addition to the interim recommendation, BCLC implemented a requirement for all players to provide an original receipt from a financial institution, as proof of source of funds.

March 2018: Prohibited Casinos from Accepting Payment from Money Service Business

BCLC implemented a policy that prohibited casinos from taking any form of payment from a Money Service Business.

June 2018: Dr. German Makes 48 Recommendations to Improve AML Policies

The Ministry of the Attorney General released an independent report of anti-money laundering policies and practices in B.C. casinos. The report identified 48 recommendations to improve anti-money laundering controls.

December 2019: German Report Recommendation Progress

BCLC continues to work with the Province to implement recommendations from the independent review. As of December 2019, BCLC has completed 7 of the 12 recommendations for which it is responsible.

For More Information About BCLC's Actions to Combat Money Laundering, Please Visit:

<https://corporate.bclc.com/anti-money-laundering.html>

Last Updated: December 6th, 2019

bclc



EXHIBIT N



[Who We Are](#) [What We Do](#) [Social Responsibility](#) [Anti-Money Laundering](#) [Careers](#) [Media Centre](#) [Customer Support](#)

Anti-Money Laundering

[Protecting Casinos From Money Laundering](#)

[Anti-Money Laundering Roles & Responsibilities](#)

[BCLC's Anti-Money Laundering Program](#)

[Status Report of Dr. Peter German's Recommendations](#)

[Suspicious Transaction Reports](#)

[Anti-Money Laundering Reports and Disclosures](#)

Social Responsibility

BCLC wants to encourage conversation with our stakeholders so that we can learn what's important to British Columbians, and respond to their needs.

[Learn more](#)

BCLC Anti-Money Laundering Program

BCLC invests substantial resources to continuously monitor and improve our anti-money laundering (AML) program. Below are just some of the steps that BCLC has taken since 2012 to safeguard B.C. casinos.

1. **BCLC encourages non-cash transactions.** In 2012, BCLC implemented policy changes to enable B.C. casinos to offer Patron Gaming Fund (PGF) accounts. This allows players to transfer money from their bank accounts into a separate gaming account, eliminating the need to bring cash into a casino.
2. **BCLC has a dedicated AML Unit** staffed with internationally certified AML investigators and certified intelligence analysts.
3. **BCLC has an Information Sharing Agreement with police** to support us in identifying and proactively banning individuals whose presence is undesirable from casinos, such as those who are suspected of criminal activity, believed to be a public safety risk or members of organized crime groups. Since the establishment of the Information Sharing Agreement in 2015, BCLC has barred more than 450 individuals from casinos. BCLC also supports civil and criminal prosecutions by providing evidence and expert testimony as required.
4. **BCLC requires and supports AML training for all service provider staff in casinos** to ensure that employees know how to identify, report and help prevent money laundering.
5. **BCLC requires casinos to clearly label all cheques as "return of funds – not gaming winnings" or as "verified win"** to prevent individuals from buying-in with large amounts of cash, playing seemingly and cashing out with a non-gaming cheque.
6. **BCLC began placing certain players on sourced-cash conditions in 2014**, meaning that they cannot buy-in with any amount of cash unless they disclose their source of funds.
7. **Today, anyone who wishes to buy-in with \$10,000 or more in cash must prove where the funds came from before they can do so.** BCLC implemented this policy in 2018 in response to the German Report's recommendation, requiring casino operators to complete a Source of Funds Declaration for all cash and bank draft/certified cheque buy-ins of \$10,000 or more. In addition, casinos have the discretion to ask anyone to provide the source of their funds, regardless of amount.
8. **BCLC monitors, controls and reports suspicious transactions of any amount in casinos**, including the exchange of small-denomination bills for large-denomination bills and casino chips between patrons. We also take steps to know our players, including using various intelligence tools and methods to confirm the identity of those suspected to be engaged in suspicious activities.
9. **BCLC verifies all PlayNow.com accounts before they are available for login**, including through reviews of a player's government-photo identification and credit history. With fully account-based play, BCLC can effectively oversee all transactions and players on PlayNow.com.
10. **BCLC continues to work with Government on implementation of recommendations from Dr. Peter German's 2018 Independent review of Anti-Money Laundering Policies and practices in Lower Mainland casinos.** To date, BCLC has completed seven of 12 recommendations.

For a more detailed view of the history of BCLC's actions, please [download our Anti-Money Laundering Actions PDF fact sheet.](#)

Did you know?

Related Links

[Anti-Money Laundering Reviews & Audits](#)

[Gaming Control Act](#)

[Gaming Policy and Enforcement Branch](#)

[Status Report on German Recommendations](#)

BCLC has completed seven of 12 recommendations for which it is responsible from Dr. Peter German's 2018 independent review.

[Learn about our review and practices >](#)

Last Updated: Dec 19, 2019

EXHIBIT 0



[Who We Are](#) [What We Do](#) [Social Responsibility](#) [Anti-Money Laundering](#) [Careers](#) [Media Centre](#) [Customer Support](#)

Anti-Money Laundering

[BCLC's Anti-Money Laundering Program](#)

[Anti-Money Laundering Roles & Responsibilities](#)

[Updates: Protecting Casinos from Money Laundering](#)

[Suspicious Transaction Reports](#)

[BCLC's Anti-Money Laundering Actions](#)

[BCLC - Police Collaboration](#)

[Anti-Money Laundering Reports and Disclosures](#)

Social Responsibility

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[Learn more](#)

BCLC's Anti-Money Laundering Actions

BCLC has continued to improve its anti-money laundering (AML) controls as part of our ongoing effort to safeguard B.C. casinos from illegal activity. Below is a chronology of key actions from 2012 to current:

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October 2012: BCLC identified and barred an individual suspected of having links to criminal activity and providing off-site cash deliveries.

New Dedicated Anti-Money Laundering Unit

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Ongoing reporting of Suspicious Transactions

February 2014: BCLC implemented a program to monitor players and transactions on an ongoing basis. Where concerns arise in relation to a player or transactions, BCLC reports those players and transactions to police, the gambling regulator and FINTRAC.

April 2014: BCLC met with the Combined Forces Special Enforcement Unit of the RCMP and requested police assistance regarding increased large-cash transactions and suspected illegal activities.

June 2014: BCLC established an Information Sharing Agreement with police to support BCLC in identifying and proactively banning individuals from B.C. casinos who are suspected of criminal activity, believed to be a public safety risk or members of organized crime groups.

July 2014: BCLC supplied to police a list of Top 10 suspected cash facilitators associated with another individual linked to organized crime.

November 2014: BCLC presented a proposal to the Combined Forces Special Enforcement Unit of the RCMP to investigate individuals suspected to be engaging in criminal activity in proximity to casinos.

Requirements for Players to Disclose Source of Funds

February 2015: BCLC requested that the RCMP's Federal Serious and Organized Crime unit initiate an investigation based on information that BCLC had collected related to cash drops at casinos by an individual believed to be associated to organized crime. Shortly thereafter, the RCMP launched its "E-Pirate" multinational money laundering investigation.

Related Links

[Gaming Control Act](#)

[Gaming Policy and Enforcement Branch](#)

[Status Report on German Recommendations](#)

EXHIBIT P

April 14 2015 to Jun 5 2019

SID	Data Conditioned			
	Month	Day	Year	Date
	4	14	2015	14-Apr-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	8	5	2015	5-Aug-2015
	9	11	2015	11-Sep-2015
	9	11	2015	11-Sep-2015
	9	11	2015	11-Sep-2015
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	9	11	2015	11-Sep-2015
	9	29	2015	29-Sep-2015
	10	11	2015	11-Oct-2015
	10	13	2015	13-Oct-2015
	10	14	2015	14-Oct-2015
	10	19	2015	19-Oct-2015
	10	19	2015	19-Oct-2015
	10	26	2015	26-Oct-2015
	10	30	2015	30-Oct-2015
	11	10	2015	10-Nov-2015

DA

Pg 121-124:

Internal Memo – Follow up: Cash Buy-ins Conducted at River Rock Cash Cages:

Pg. 121: "Total cash buy-ins conducted at cages for the Period of July 1, 2015-December 31, 2015 were \$102,397,000. This represents a decline of 27% from the previous six months."

Pg. 123: In 2015, BCLC's AML unit began issuing letters to high risk patrons advising them they are no longer permitted to buy-in at any BCLC site with "un-sourced" cash...the significant drop in cash buy-ins at the cages for the period of July 1, 2015 to December 31, 2015 can be associated, in part, to the enforcement of this directive by BCLC and the service provider."

Pg. 124: BCLC un-sourced cash directives were issued to high limit patrons, who were buying in with a large volume of small denomination bills. Despite these patrons having a long history of gambling, the nature of the cash they presented at the casino suggested that the money did not come from a recognized financial institution and may be of questionable source. Overall, although cash buy-ins at the cages decreased and PGF activity increased, the net effect was a significant decline in both table drop revenue and net table win at River Rock.

Pg 125-130:

Internal Memo – River Rock Casino Cash Transfer Analysis between High Limit Cages and Vault:

Pg. 125: To prevent a patron from refining bills for the purpose of money laundering, sites are advised by BCLC to pay out patrons in the same denomination in which they bought in with. This requirement is not stated in the BCLC Casino and Community Gaming Centre Standards, Policies and Procedures.

EXHIBIT Q

EXHIBIT R

Gmail - FW: [E!] Re: Re: Re: Re: GPEB gaming investigator

M Gmail

Ross Alderson [REDACTED]

FW: [E!] Re: Re: Re: Re: GPEB gaming investigator

1 message

Sat, Sep 21, 2019 at 12:06 PM

Ross [REDACTED]
Reply-To: Ross [REDACTED]
To: [REDACTED]

Sent with [REDACTED]

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

On Saturday, September 21, 2019 12:00 PM, Fred Pinnock [REDACTED] wrote:

Intact Insurance Company

2nd of 2

From: Samuel Taylor [REDACTED]
Sent: September 16, 2019 2:53 PM
To: Fred Pinnock [REDACTED]
Subject: [E!] Re: Re: Re: Re: GPEB gaming investigator

Hi Fred,

Just wanted to touch base with you again, now that I'm six months in and finished probation at GPEB. I'm actually now on temporary assignment to the Gaming Intelligence Unit over at Green Timbers, although I'm working out of the GPEB Burnaby offices.

It's been a surprising six months, to say the least. On my first day, a disgruntled GPEB investigator stopped in to see us two new hires and said to us: "This is a retirement gig for ex-cops. What are you doing here?" It's a question I've been trying to answer ever since. GPEB's flirtation with hiring civilians (i.e. not former police) seems to have ended and the other folks from a civilian background who were hired around the same time as me have all resigned by now. The organization has also lost a number of its retired-police employees, meaning that although there's been a lot of hiring over the past year, there are actually fewer investigators at the casinos than when I started.

For my part, I've been keeping busy here. I'm no longer in the Enforcement Division, where I started, as I requested to do a small project to improve GPEB's data management approach to collecting and using suspicious transaction data from casinos. The project got approved and I completed it quickly, but one thing has led to another and Cary decided that I would now be of more use in the Intelligence end of things under Ed Hipsz. I've only been on this temporary assignment for a few weeks, so I don't know much about how that will work yet.

[REDACTED]

RS

I had hoped to learn a great deal about investigation work from my colleagues here and to benefit from the decades of policing experience around me, but there doesn't seem to be much actual investigation work happening. Over the months that I worked in Enforcement, the only files I received or saw my colleagues receive were incident reports from the casinos that we were tasked with summarizing and filing away. I'm now the one person "in charge" of all reports of suspicious financial transactions in casinos in the Lower Mainland, but my mandate is to record summary information from the service providers' report and then archive the file. I'm told we don't have the resources to actually investigate the transactions. As people keep saying since I started here, maybe one day things will change but it will be a slow process if it ever happens.

There seem to be several indicators that money laundering is occurring with the passive complicity (at least) of the casino operators, but when I've brought some of these topics up to our executive management and suggested actions we could take, they've made it clear that they don't want to risk bothering the service providers, with whom they are trying to cultivate a positive relationship. In fact, the only actual investigations and enforcement actions we take seem to be those where the casino is the victim and specifically directs us in what to do. For example, we'll get a call from a casino which has caught an employee stealing and wants us to make the arrest. We'll ask the casino management when and how they want the arrest to be made (e.g. tomorrow night at the gaming table in front of other employees with a perp walk requested across the gaming floor) and then we'll go in and do what they've asked. We don't liaise with Crown or try to ensure that appropriate charges will be laid or that substantive prosecutions are possible based on the evidence we gather -- as our Director has told us, arrests are our metric; convictions are someone else's problem.

I think the public would be shocked to learn that GPEB investigators are almost entirely tasked with investigation and enforcement where the casino is the victim. In fact, when any report is received involving suspicious financial activity, it is removed from the list of reports to be assigned for investigation. Until this week, I thought that some investigation of these reports must be going on behind the scenes, but have now confirmed that this is not the case.

I had thought that we would be investigating the dirty money directly and then flexing our regulatory authority to make sure the casinos weren't complicit in accepting it. Yet even where casinos are clearly not following basic AML procedures, we have been told to ignore it. Neither is GPEB really set up to try to tackle AML issues. I have found no one in Enforcement or management who has any AML training or experience, and although we have one person in the organization who has relevant language abilities (Mandarin and Cantonese mostly), it is only one person and they are not in an investigative role. That leaves us basically ignorant of how money-laundering works and how to investigate it, and essentially unable to communicate with the people involved. Several of my colleagues are convinced that the government has no actual interest in reducing money laundering in BC casinos and that GPEB is not operating in good faith. I don't share their cynicism because I can see that there are good people working here, but it is getting increasingly difficult to explain why nothing is being done.

Perhaps the German report is part of the problem. The government acted strongly on German's recommendations, but German's approach seems to have contained a serious flaw when it came to evaluating the role of the service providers. The major recommendation from the report which is driving change is the one to establish a 24/7 casino police force presence. Since forming an actual police force was a non-starter, the decision seems to have been made to create a pseudo-police force (i.e. a force of SPC's who are former police). Since there's very little for them to actually do on the floor of casinos, I'd say we probably provide more of a two-hour-a-day presence split across two casinos than a twenty-four-hour-a-day presence in all of

PA

9/21/2019

Gmail - FW: [E] Re: Re: Re: Re: GPEB gaming investigator

the five major casinos. The "presence" is provided in plainclothes, though, so it's often only the casino surveillance team that's even aware that GPEB investigators are on site. I've been on many of these patrol shifts with senior Gaming Investigators where no contact of any sort was made with casino staff -- the "patrol" consists of eating dinner in the casino's restaurant. On these nights, frankly, the cash cage could have been held up at gunpoint an hour earlier and we'd have no idea. So much for "presence".

German strangely failed to find any indication that the casinos were aware that the hundreds of millions of dollars of bundled \$20s they'd been accepting were suspicious in nature. He did them the tremendous favour of concluding that they were the "unwitting" victims of money laundering, rather than accomplices profiting from the crime. German was able to come to this surprising conclusion, famously, without interviewing Walter Soo, the GCC executive who was central in bringing Chinese "whale" gamblers to Vancouver where they played with dirty money, who has been associated with Asian Organized Crime extensively in the media, and who was (is?) a colleague of Peter German's on the board of the Richmond Olympic Oval. Maybe that's corruption; maybe it's just bad optics. Either way, I've read the German report three times and still can't see how he could have come up with that conclusion.

The problem is that as I get to see more and more of a dysfunctional government response to this crisis, it's harder to tell whether the attempt is being made in good faith and needs support, or whether the attempt is being made in bad faith and is intended to fail.

I truly hope the Public Inquiry will delve deeply into the money laundering scandal and that real change will result from it. I hope your efforts to bring proper attention to this issue continue to bear fruit. For my part, I'm going to stay on here for a while longer looking for some way to make a difference. Everyone keeps saying that things will change here eventually. There's a program in the Public Service that allows employees to try another role for a six-month period, and I plan to sign up for that. I think there's a real risk of burning out due to frustration (as several others have already) before the slow pace of government catches up with new initiatives. So possibly my best bet is to check out another area of government for half a year, then check back in with GPEB to see if they're doing anything substantive yet. There are, as I've said, good people here and it would be a dream to work with them on tackling money laundering in casinos.

Maybe one day.

Yours truly,

Sam Taylor

On Sat, Mar 2, 2019 at 12:34 PM Fred Pinnock [redacted] wrote:

Congratulations Sam....I am in no way surprised.

Go kick some ass mister. You're a good man.

Fred

RA

EXHIBIT S

 Gmail

Ross Alderson 

546714

Ross Alderson 
To: "JAG WEBFEEDBACK JAG:EX" <AGWEBFEEDBACK@gov.bc.ca>

Tue, Mar 13, 2018 at 2:11 PM

Attention: The Honourable David Eby, Q.C.
Attorney General for the Province of British Columbia

Dear Sir,

Thank you for your email.
I greatly appreciate you personally taking the time to respond, particularly during the sitting of the Legislature.
Yours Respectfully

Ross Alderson

On Tue, Mar 13, 2018 at 10:36 AM, JAG WEBFEEDBACK JAG:EX <AGWEBFEEDBACK@gov.bc.ca> wrote:

Mr. Ross Alderson

Email 

Dear Mr. Alderson:

Thank you for your emailed letter of February 19, 2018, regarding your concerns about British Columbia's anti-money-laundering practices and policies and for providing suggestions.

I have forwarded your letter to Mr. Peter German to inform his independent review of British Columbia's anti-money-laundering policies and practices in relation to BC casinos.

Following your initial letter, you emailed on February 19, 2018 to express concern that BCLC had become aware you had written to my office.

While evaluating where this letter should be directed for action, both BCLC and Mr. German were considered. BCLC was considered because significant portions of your letter related to your time as an employee, and Mr. German was considered because of the use it may be for his review. Ultimately, I decided it was most appropriate to forward this to Mr. German. In the process of making this determination, BCLC became aware of the letter's existence. A copy of the letter was not provided to BCLC.

Thank you for writing.





[REDACTED]
Yours truly,

David Eby, QC
Attorney General

546714

[REDACTED]