

1/30/2021



Ross Alderson

LT R Alderson re resignation

Isherwood, Herb Sun, Dec 17, 2017 at 9:54 AM , "Jamie Callahan Cc: "Jim D. Lightbody"

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

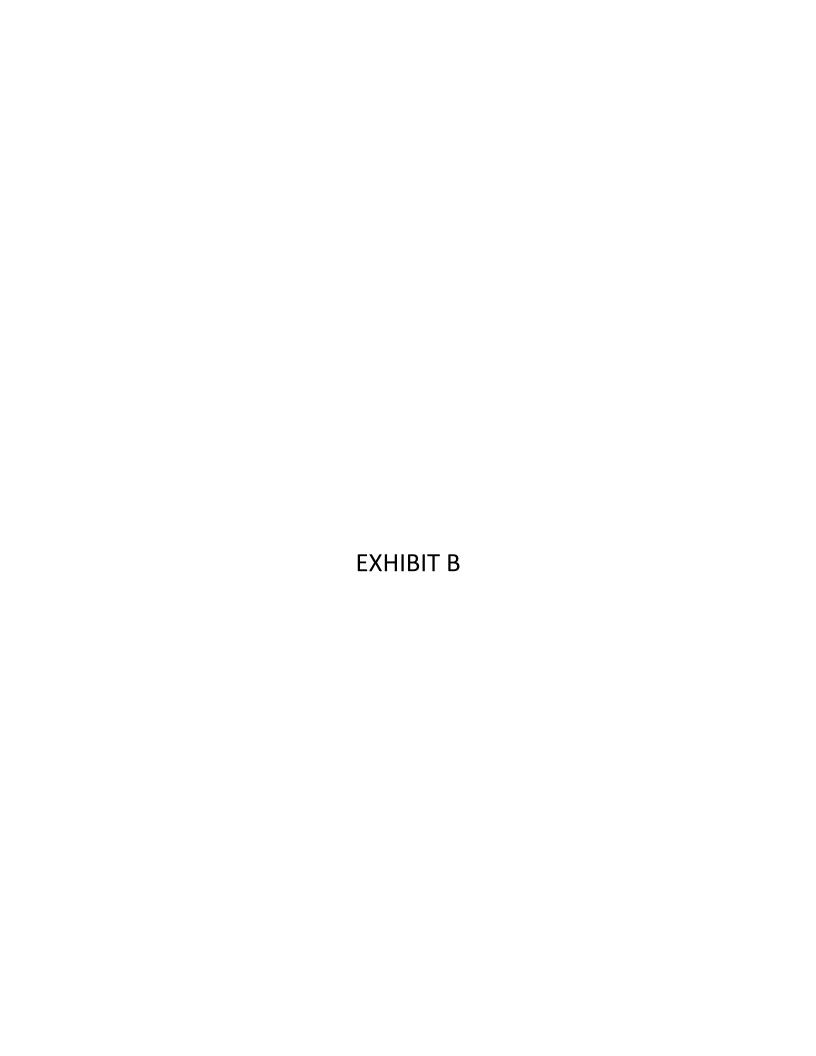
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2 attachments



LT R Alderson re resignation.pdf 138K







Ross Alderson

Untitled

Ross Alderson To: "McGowan, Patrick CC:EX" Cc: "Latimer, Alison CC:EX"

Tue, Feb 11, 2020 at 5:30 AM

'McCleery, Kyle A CC:EX"

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

> Pages 14 and 15 Internal BCLC emails. I provided some background to BCLC communications some of the questions arising from the Van Sun reports. I admit that BCLC had limited analysis capicity on \$20 bills. I also point to the potential conflict (with Fintrac) of having a prescribed \$ limit (which was one of the first German interim recommendations) rather than a risk based approach. I suggested a mix of both strategies in my Sept 8, 2015 report to Rob Kroeker. (which you have a copy)

I heard murmurs in 2017 that the casino industry may legally challenge the Ministry on the interim recommendation around the \$10K threshold because of the impact to revenue, particularly as law enforcement have been unable to get a successful criminal prosecutions related to the buy in funds.

Page 18 email re an offer of hockey tickets by BCLC to GPEB and ADM.

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.

4. This morning there was a story in the Vancouver Sun https://vancouversun.com/news/localnews/province-files-another-lawsuit-against-assets-of-alleged-money-launderer-paul-jin I refer to the following passage.

The obvious question in my mind then and now remains: If you ban someone based on their association to organized crime and loan sharking, how is it he and his associates were able to make a further 140 cash deliveries totalling \$23.5 million over 3 years. My position has always been it was pointless to ban someone as they then just go offsite or someone else fills the void. To be truly effective you need to question the player cash and that did not happen until late summer 2015 after my conversation with Calvin bringing in the CHRUSTIE on July 22.

5. Earlier this month I finally responded to Associate Deputy Minister Doug Scott's letter of August 2019. I have attached it for your information. Mr. Scott was assigned by the AG to deal with me and my ombudsperson complaint against the office of the AG. You might note one of the recipients of the "hockey ticket" email include Mr.Scott who was GM of GPEB between 2010-2013. As GM he signed off on the GPEB 2012 annual report which led to a police services investigations into integrity related matters. Again this was raised by me during 2013/2014 when I put together a report.

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 outed 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.

> 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



170925 Eby-Gaming-Briefing.pdf



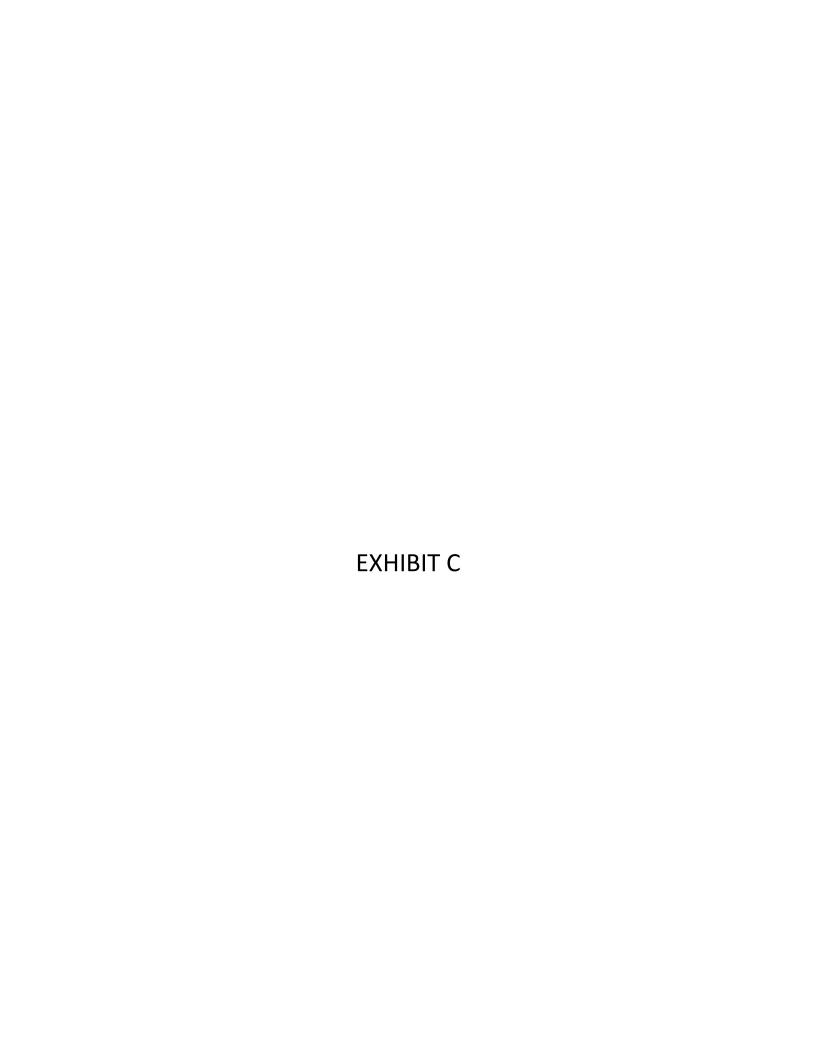
19-048 Record.pdf 142K



Summary of FOI.pdf 8890K



Letter to DSScott_FINAL200115.pdf 154K





Cullen Commission of Inquiry into Money Laundering in BC

PO Box 10073

Suite 601 – 700 West Georgia Street

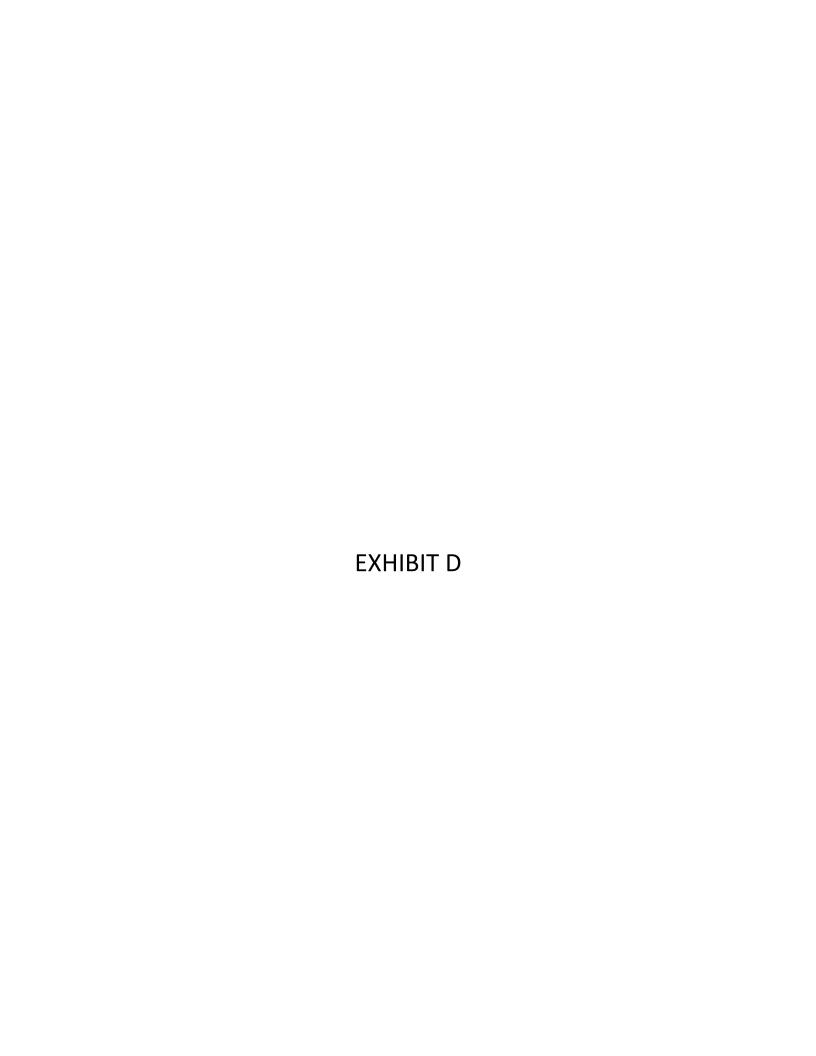
Vancouver, BC V7Y 1B6

Toll Free:

Facsimile: 604-669-1207

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.

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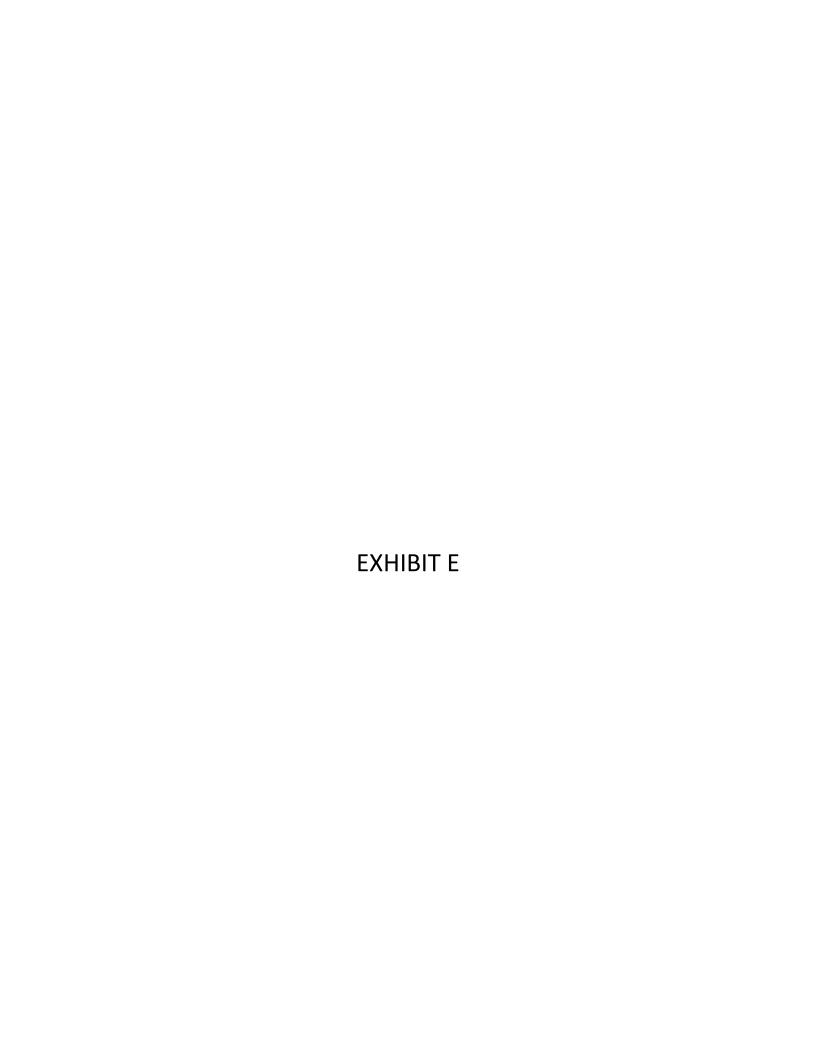


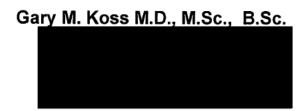
Vancouver, BC V7Y 1B6

Facsimile: 604-669-1207

Toll Free:

2/27/2021	Gmail - Untitled
M Gmail	Ross Alderson
Untitled	
McCleery, Kyle A CC:EX	Sat, Feb 29, 2020 at 4:23 Al
To: Ross Alderson Cc: "McGowan, Patrick CC:EX"	"Latimer, Alison CC:EX"
Ross,	
As discussed on the phone last week, please	se find attached a summons for our meeting on Monday.
sure that we get everything you have before	very broadly. Because you're leaving the country shortly, we would like to make e you go, so we've cast a very wide net to ensure that there are no legal or y records you have or discussing with us any of your knowledge or experience work.
and useful, so there's no need for you to pu	the work of sifting through the records you have to determine what is relevant ut any thought into that during what I'm sure is a busy and stressful time it you have and we'll figure it out from there.
Thanks again for all of your assistance so f	far – we're looking forward to seeing you again on Monday.
Kyle	
Kyle McCleery	
Email:	
Direct:	
Cullen Commission of Inquiry in	to Money Laundering in BC
PO Box 10073	
Suite 601 - 700 West Georgia Stre	eet





December 3, 2020

To Whom It May Concern:

RE:

Ross Adlerson

D.O.B.: February 18, 1971

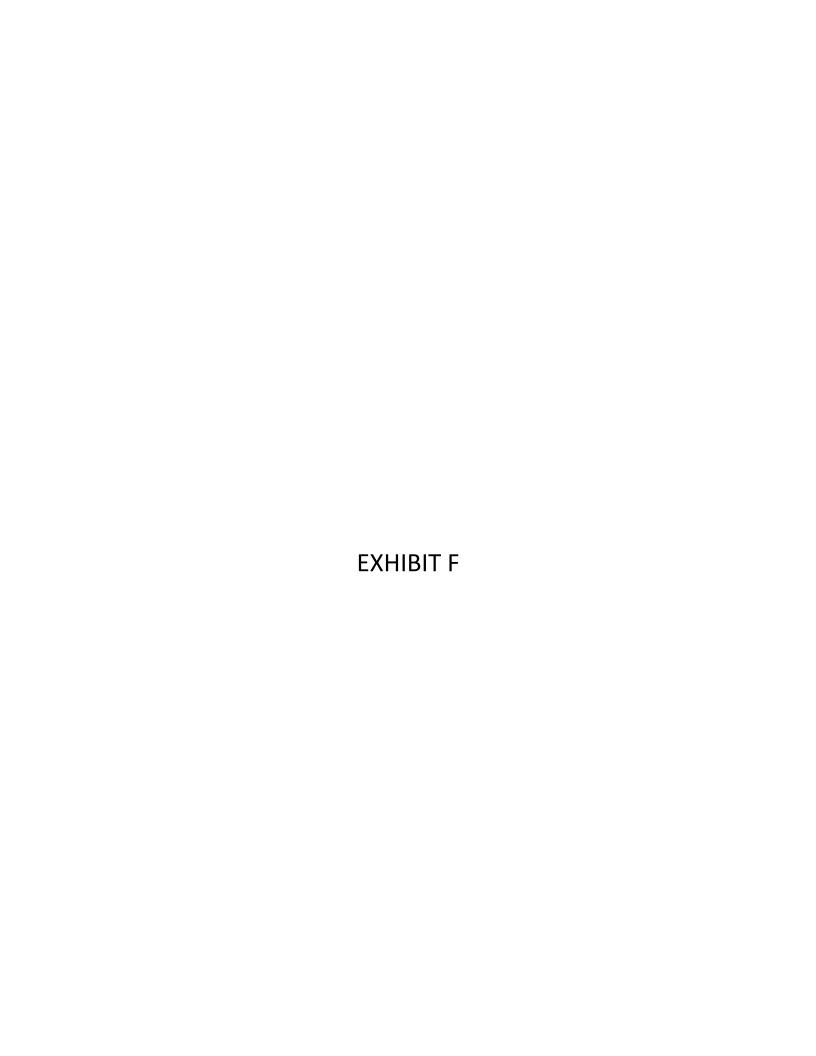
I was Ross Alderson's Family Physician from 2008 to 2018. I retired in 2018. My practice was located at 120-6180 Blundell Road, Richmond, B.C., V7C 3K9. The above is my retirement address.

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.



12/21/2017 Gmail - Resignation



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

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 [mailto

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

To: Kris Gade Bal Bamra Daryl Tottenham

12/21/2017 Gmail - Resignation

Cc: Kevin Sweeney Subject: Resignation

Dear Bal, Daryl and Kris,

[Quoted text hidden]

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.



11/8/2019 Gmail - Lunch Dec 27



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...●

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 Gade ; Bal Bamra ; Daryl Tottenham

Cc: Kevin Sweeney Subject: Resignation 11/8/2019 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.

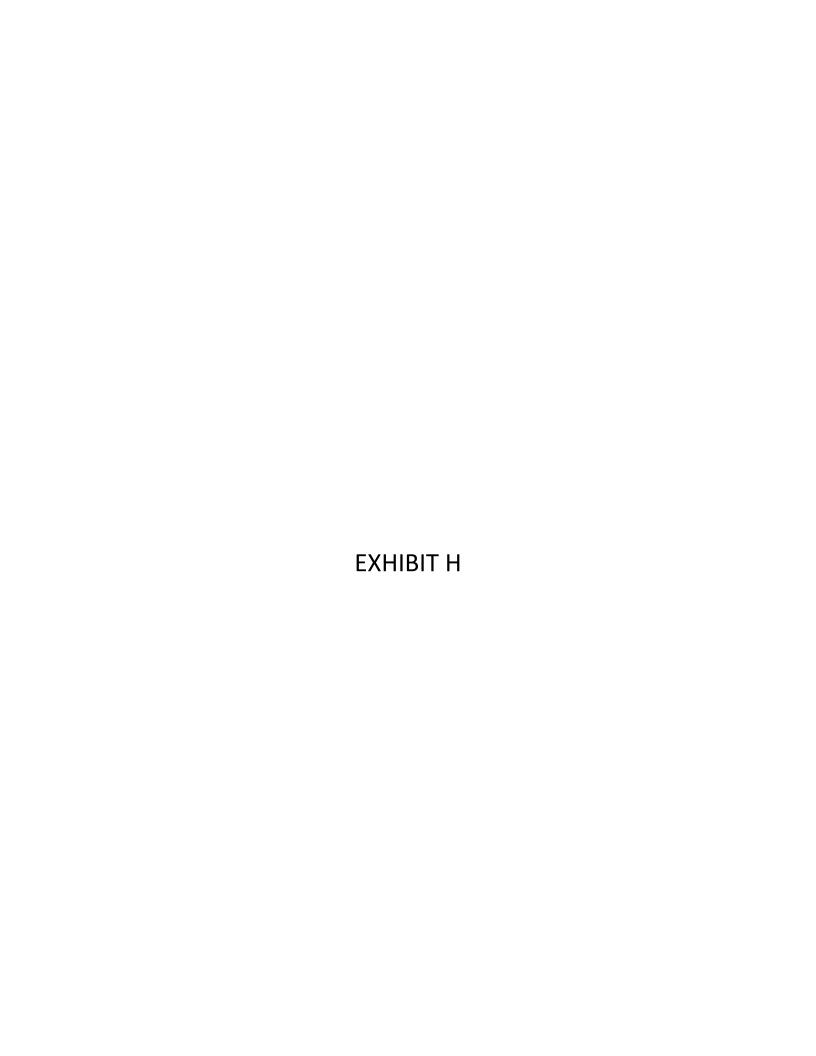
Have a great Christmas and New Years with your families

I am open to contact on this email address

Regards

Ross

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11/8/2019



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...

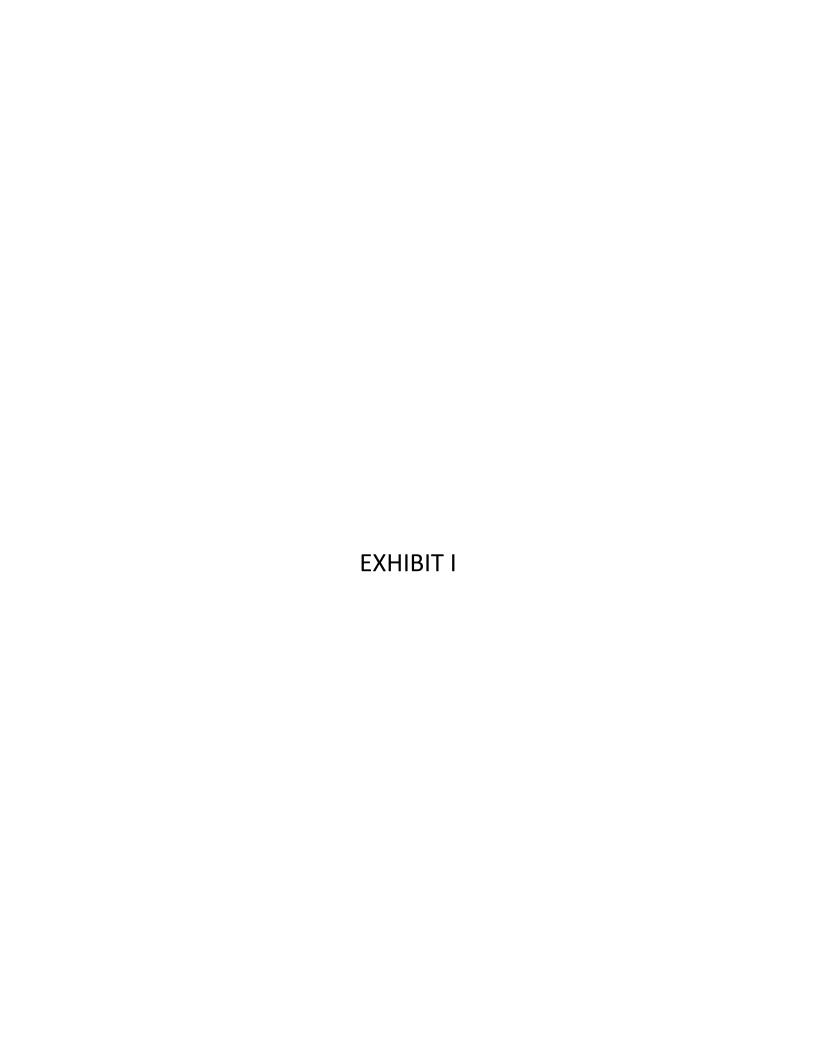
11/8/2019

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

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

[Quoted text hidden]

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11/8/2019 Gmail - Hi



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

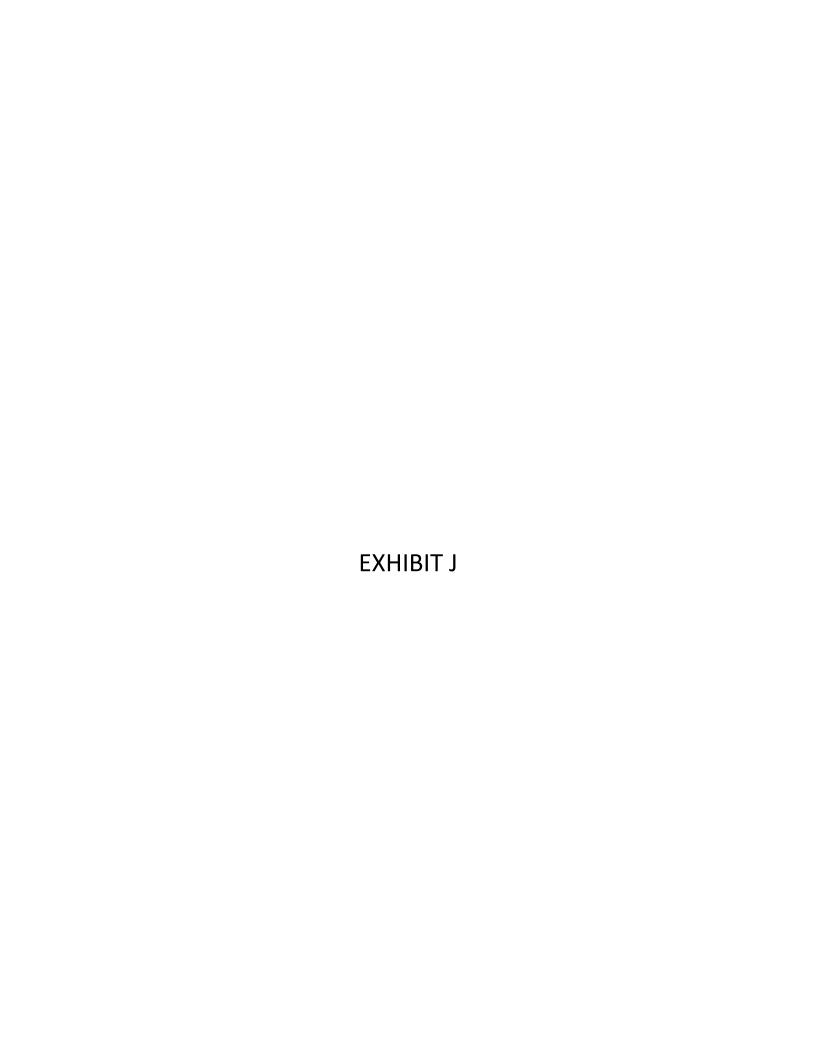
Hi mate,

Hope you are doing ok. The report is pretty scathing and in parts not particularly objective or fair on bclc. That's a shame.

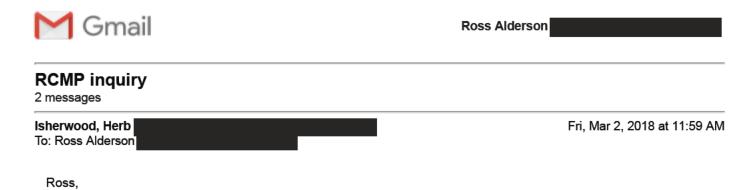
Anyway take care and give my regards to the team

Sent from Ross's iPad

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9/26/2018 Gmail - RCMP inquiry



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 Mon, Jun 25, 2018 at 10:51 AM To: Ron Josephson

9/26/2018 Gmail - RCMP inquiry

This was the email from Isherwood in March. I subsequently met with RCMP and told them what I knew which was very little

Sent from my iPhone

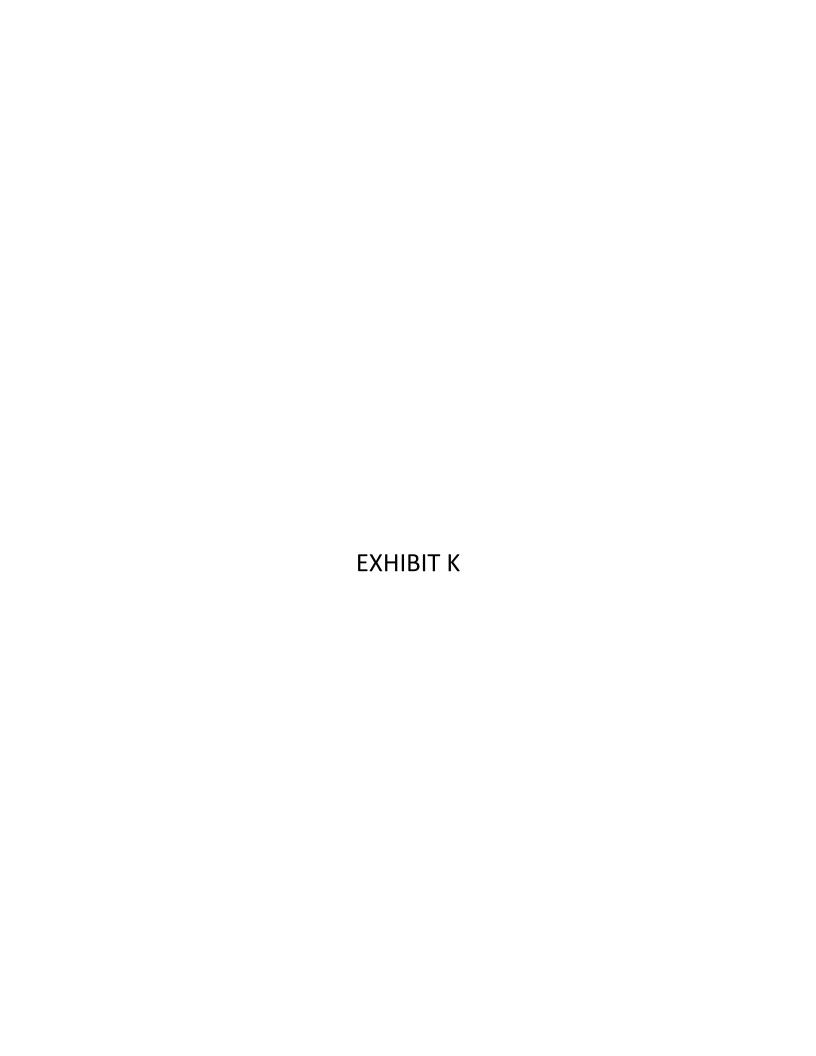
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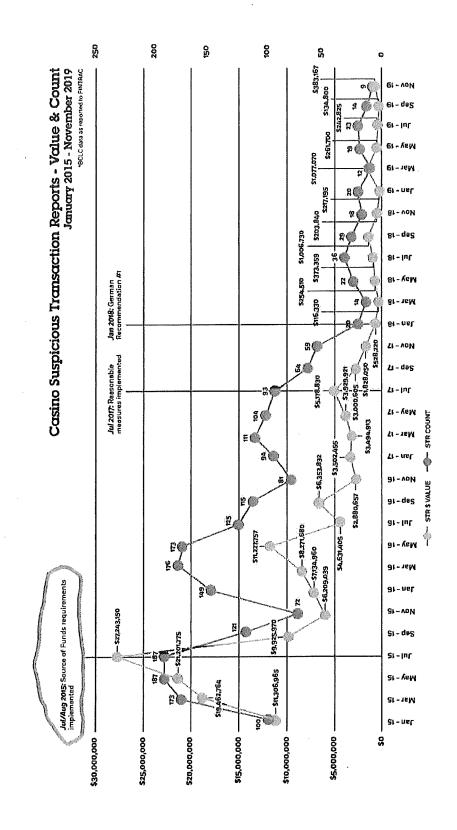
From: "Isherwood, Herb"

Date: March 2, 2018 at 11:59:33 AM PST

To: 'Ross Alderson' Subject: RCMP inquiry

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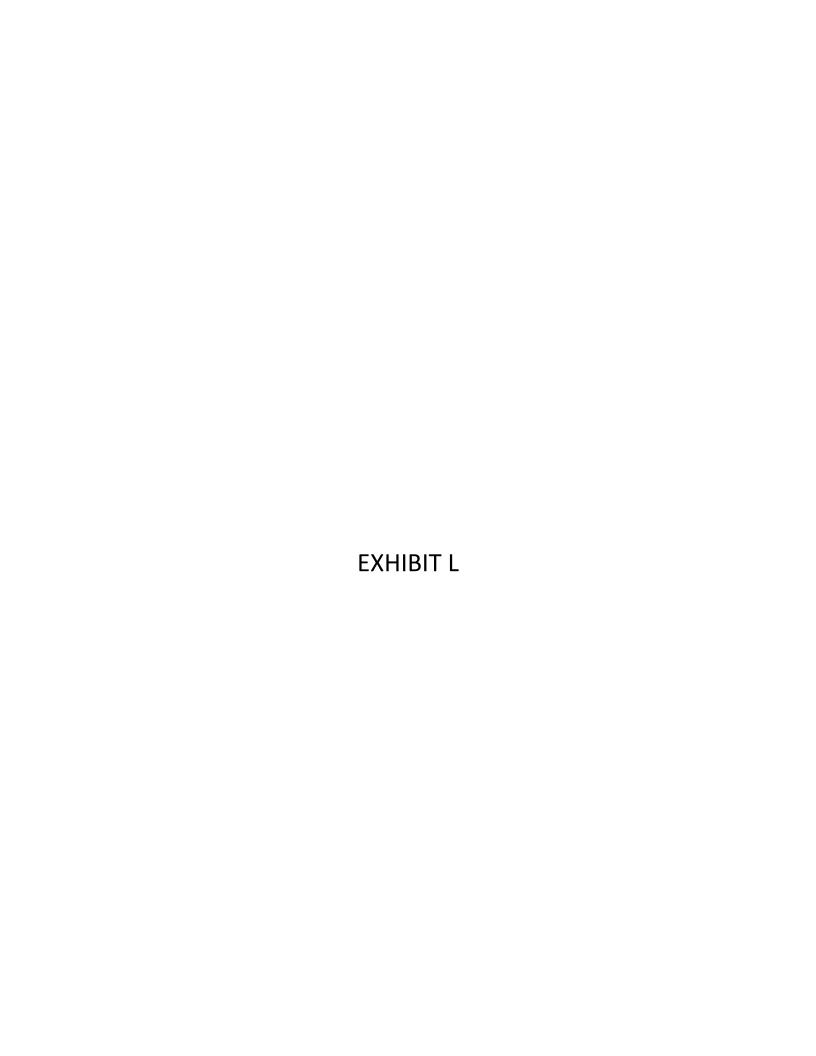


EXHIBIT L

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 Prolects

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

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 noncash transactions to reduce the flow of large amounts of cash in casinos. This included allowing B.C. casinos to offer Patron Garning 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: <u>BCLC requested that the RCMP's Federal Serious and Organized Crime unit</u> 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

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.



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 <u>a protocol</u> 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 <u>Dr. Peter German's first interim</u> 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 <u>independent report</u>
of anti-money laundering policies and <u>practices in B.C. casinos</u>. 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.

Lest Updated: April 05, 2019



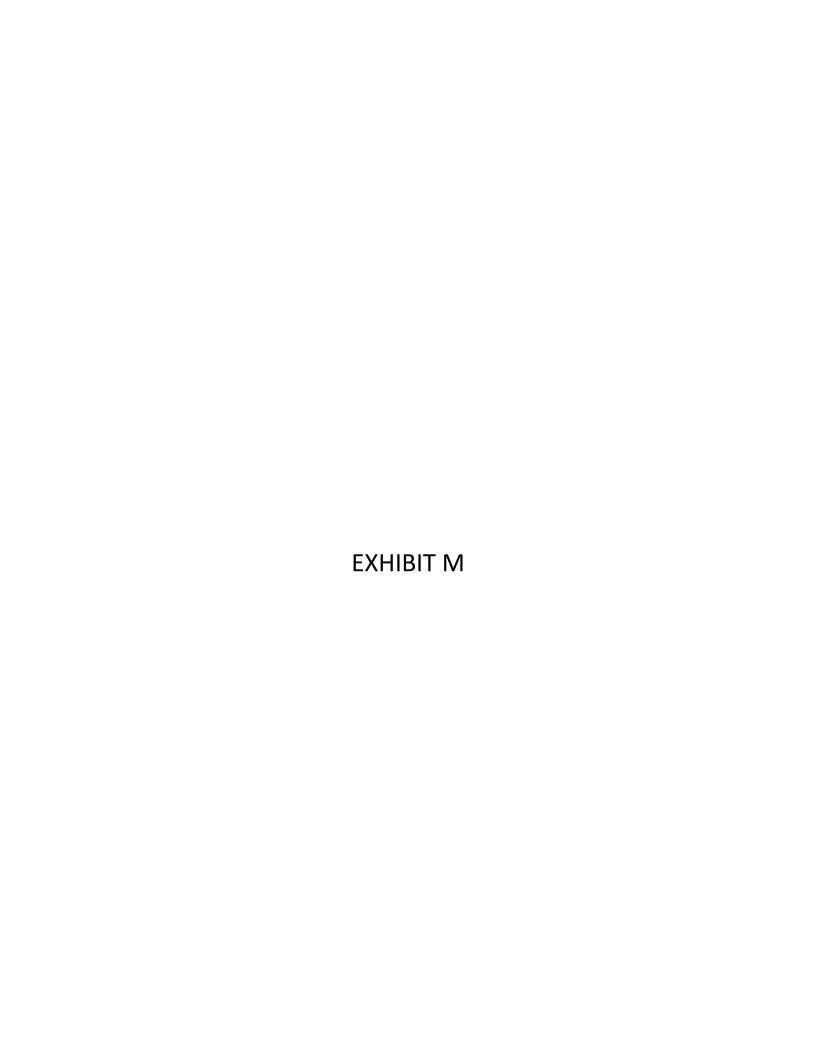


EXHIBIT M

BCLC's Anti-Money Laundering Actions

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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.

bele

PH

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.

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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 <u>7 of the 12 recommendations</u> 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

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EXHIBIT N



Who We Are

What We Do

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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.
- 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.
- 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 individuals making out with a general
- 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, any new viscous provided in the 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, <u>BCLC has completed seven of 12 recommendations</u>.

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.

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Last Updated: Dec 19, 2019

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EXHIBIT O

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Who We Are

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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

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'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 noncash 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: <u>BCLC requested that the RCMP's Federal Serious and Organized Crime unit</u> 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



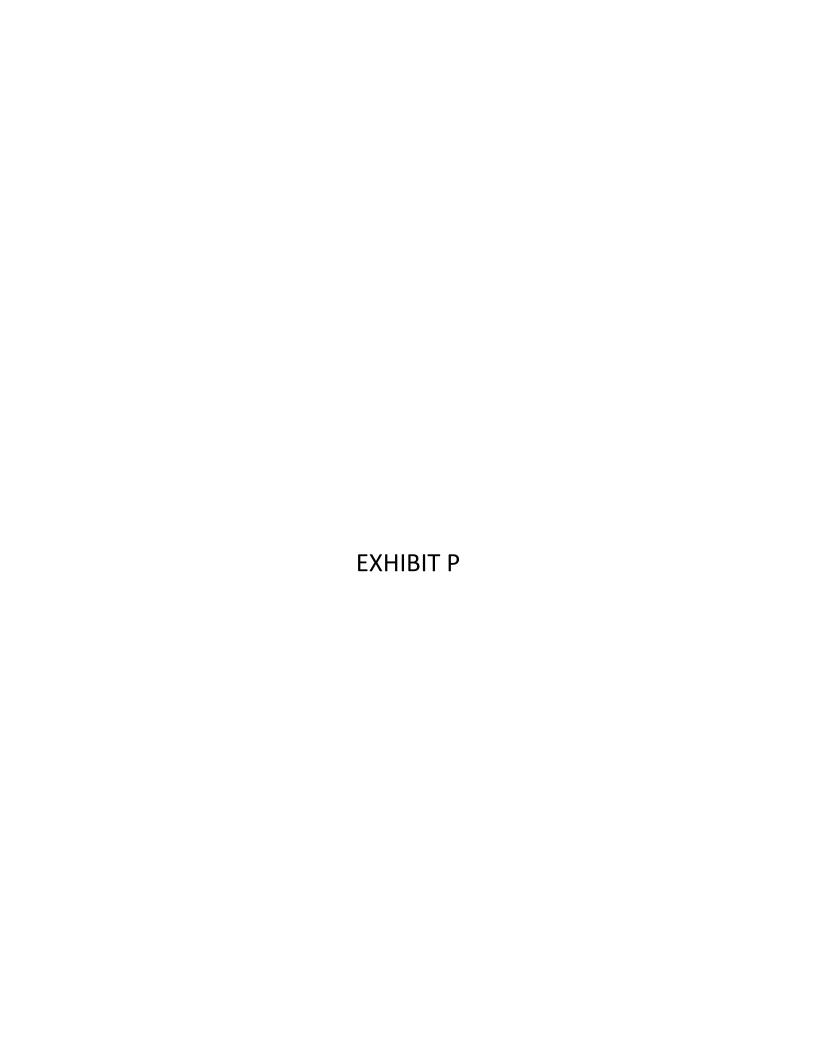


EXHIBIT P

April 14 2015 to Jun 5 2019

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SCLC FOI 17-062 Page 118

Pg 121-124:

Internal Memo - Follow up: Cash Buy-ins Conducted at River Rock Cash Cages were \$102,397,000. This represents a decline of 27% from the previous six months? Pg. 121: "Total cash buy-ins conducted at cages for the Period of July 1, 2015-December 31, 2015

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 to the enforcement of this directive by BCLC and the service provider." buy-ins at the cages for the period of July 1, 2015 to December 31, 2015 can be associated, in part

the nature of the cash they presented at the casino suggested that the money did not come from a Pg. 124: BCLC un-sourced cash directives were issued to high limit patrons, who were buying in with drop revenue and net table win at River Rock. a large volume of small denomination bills. Despite these patrons having a long history of gambling, 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

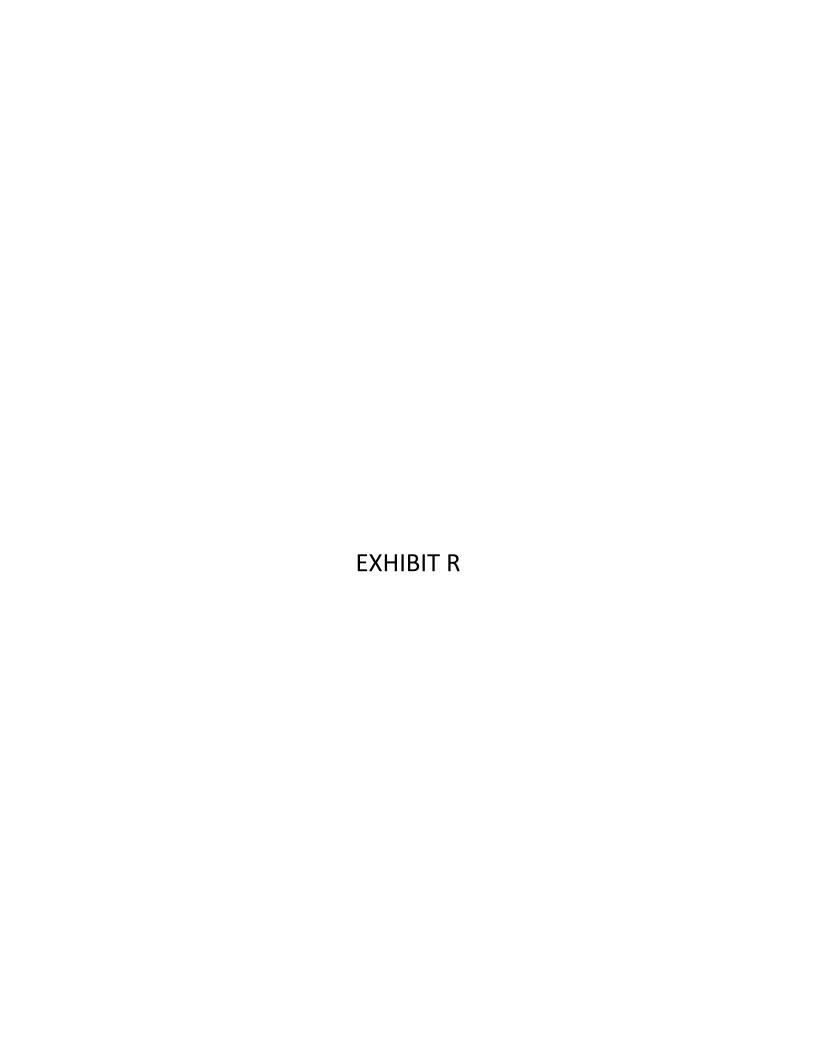
Pg 125-130:

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

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

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EXHIBIT Q





Ross Alderson

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

1 message

Ross Reply-To: Ross To:

Sat, Sep 21, 2019 at 12:06 PM

Sent with ProtonMail Secure Email.

-- Original Message ------

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

Intact Insurance Company

2nd of 2

From: Samuel Taylor

Sent: September 16. 2019 2:53 PM

To: Fred Pinnock

Subject: [E!] 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 excops. 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.

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 saving 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 twohour-a-day presence split across two casinos than a twenty-four-hour-a-day presence in all of

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

9/21/2019

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 wrote: On Sat, Mar 2, 2019 at 12:34 PM Fred Pinnock Congratulations Sam....I am in no way surprised. Go kick some ass mister. You're a good man. Fred

From: Samuel Taylor **Sent:** March 2, 2019 12:08 PM To: Fred Pinnock Subject: [E!] Re: Re: GPEB gaming investigator Hi Fred, Just wanted to let you know I got the job at GPEB. I was sworn in as a Special Provincial Constable yesterday and I'll actually start work on the 11th. I appreciate your support and I'll let you know how it goes. Yours truly, Sam Taylor On Sun, Jan 13, 2019 at 8:24 PM Fred Pinnock wrote: Super, Sam...thanks and no surprise that things went well. If I hear from them I will let you know. All the Best...Fred From: Samuel Taylor Sent: January 13, 2019 2:20 PM To: Fred Pinnock **Subject:** [E!] Re: Re: GPEB gaming investigator Hi Fred, Just got back to Canada from holiday vacation in Wales. I had my GPEB interview on Tuesday by video conference and I think it went well. Richard and Cary were very nice, as I've given you as a reference so do let me know if you hear from them! I'm on the edge of my seat :) Thanks again. Yours truly, Sam Taylor

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

On Sun, Jan 6, 2019 at 3:14 PM Fred Pinnock

wrote:

Excellent Sam, and yes my cell is the same.

I had lunch in July with a senor GPEB manager, Bob Stewart, who expressed concern about corruption within BC's gaming compliance community. I expected that more resources would be committed to GPEB upon the release of Peter German's report. Good to see that they have attracted top level talent within their pool of applicants.

You can expect that I will sing your praises if I receive a call. Mike feels the same about you. Feel free to include his name and number (604.258.8364) among your references.

I look forward to our paths crossing one day, hopefully next summer. We've now completed our 1000 sq ft deck, so the view is amazing and it's no longer a construction zone.

Best of luck...Fred

From: Samuel Taylor

Sent: January 6, <u>2019 11:00 AM</u>

To: Fred Pinnock

Subject: [E!] Re: GPEB gaming investigator

Hey Fred,

Thanks so much. As always, you are very kind and I will certainly use you as a reference. Are you still at 604-619-5767 and may I give them that number for reference purposes?

Yes, GPEB would be an interesting move for me, if they'll have me. We haven't gotten to the stage where I get to ask them any questions about the position yet, so I'm not entirely sure what I'm getting into, but I gather that they're making some changes in response to Dr. German's report and that creating some new positions is part of it. I'm hoping that I'll be able to pursue my passion for investigation work and that my casino experience will be an asset.

So glad that you're able to work out of your home office. It does sound idyllic. I'm not sure when the wife and I will get out to the Okanagan next, but would love to visit you when we do.

Cheers.

Sam

On Sat, Jan 5, 2019 at 10:37 AM Fred Pinnock

wrote:

Hey Sam, and Happy New Year sir.

An interesting move for you. Cary and Richard are both good guys...I know them both from policing days. I don't know Catherine.

Please mention that I'd be happy to act as a reference for you.

And yes, Naramata is still the best thing we've done. I'm sitting here in my home office as we speak.

Good luck with the interview, and let me know if I can be of any assistance.

Best...Fred

From: Samuel Taylor

Sent: January 5, 2019 10:34 AM

To: Fred Pinnock

Subject: [E!] GPEB gaming investigator

Hi Fred,

I've applied for a position as a gaming investigator at GPEB and cleared the initial hurdles, so I have an interview with them on Tuesday morning. I thought I'd reach out to you to see if you had thoughts to share on the restructuring of GPEB and on Dr. German's report.

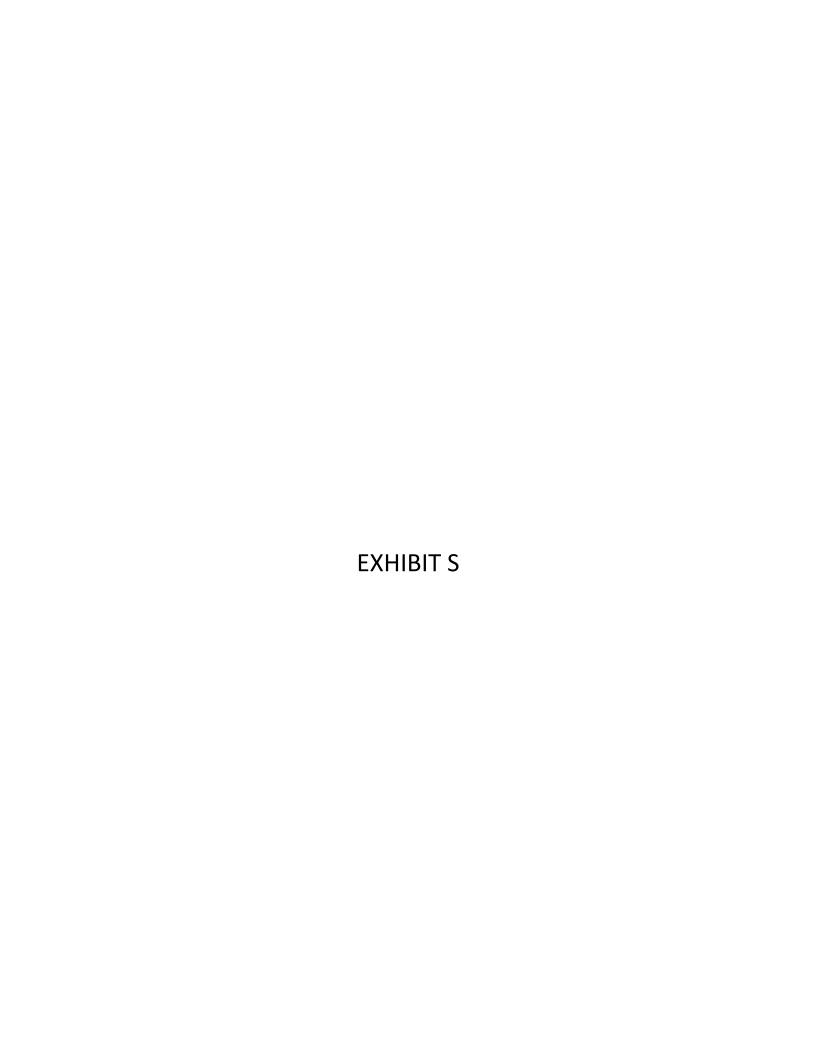
I was also curious if you knew any of the panel I'll be interviewing with -- Richard Akin, Catherine Holder, and Cary Skrine?

Hope all is well with you. Are you getting to spend much time living the good life in Naramata these days?

Yours truly,

Sam Taylor

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



12/7/2018 Gmail - 546714



Ross Alderson

546714

Ross Alderson

Tue, Mar 13, 2018 at 2:11 PM

To: "JAG WEBFEEDBACK JAG:EX"

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

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.

546714

12/7/2018	Gmail - 54671
Yours truly,	
David Eby, QC	
Attorney General	