

**COMMISSION OF INQUIRY INTO
MONEY LAUNDERING IN BRITISH COLUMBIA**

The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Caterina (Cathy) Cuglietta, with a business address of 74 Seymour Street W, Kamloops, BC, V2C 1E2, AML Business Intelligence Analyst for British Columbia Lottery Corporation, MAKE OATH AND SAY THAT:

1. I am employed as an Anti-Money Laundering (“AML”) Business Intelligence Analyst for British Columbia Lottery Corporation (“BCLC”), and as such have personal knowledge of the facts and matters in this affidavit. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of that information and belief. I believe that all of the information in this affidavit is true.
2. As set out in paragraph 2 of my Affidavit #1, which is Exhibit 482 in this Commission of Inquiry, I am an AML Business Intelligence Analyst for BCLC. Prior to and including 2014, my role also included tracking service provider compliance with AML training and ensuring all service provider and BCLC site staff had completed the necessary AML training.
3. I have reviewed Exhibit A to the Affidavit #1 of Patrick Ennis made January 22, 2021 (Commission Exhibit 530). As set out in paragraph 26 of Mr. Ennis’ affidavit, Exhibit A is a true copy of PowerPoint slide decks used by BCLC in training GCGC staff. I can confirm that the presentation was also used to train all casino and community gaming centre service provider staff as well as BCLC staff working on site (as opposed to BCLC office employees).
4. I was responsible for modifying and updating this version of the online AML training for service providers and BCLC site staff, which I did in conjunction with members of the


AML Unit. I recall that this version of the AML training included new content in response to amendments to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (S.C. 2000, c. 17) which came into force in February 2014, including regarding enhanced due diligence. Given the significance of the changes, I recall that prior to uploading and making this revised training available on the BCLC learning management system (“LMS”), BCLC sent out instructions requiring that all service provider staff take the revised online training within a specific period of time (I believe three months).

5. The presentation is not dated on the face of the document and is not identified in Mr. Ennis’ affidavit. I have reviewed a copy of the original/native version of the PowerPoint presentation attached as Exhibit A to Mr. Ennis’ affidavit (BCLC0000142) including the document properties and confirm as follows:
 - (a) The title of the PowerPoint presentation is “2014 08 14 AML SP On-line Version”;
 - (b) The document was created on March 16, 2010;
 - (c) The document was last printed on September 17, 2014; and
 - (d) The document was last modified by me on October 10, 2014.

6. I have reviewed my employee profile within BCLC's LMS, which indicates that the form of AML training attached as Exhibit A to Mr. Ennis' affidavit, including that referred to at slide 43 entitled "Source of Funds", was first made available to service providers and BCLC casino staff on or about October 27, 2014.

7. I make this Affidavit for use in the Cullen Commission of Inquiry into Money Laundering in British Columbia, and for no other purpose.

SWORN BEFORE ME at Kamloops,
British Columbia, on 31/AUG/2021.



A commissioner for taking affidavits for
British Columbia

Robert Connolly
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CATERINA (CATHY) CUGLIETTA

