

**To:** Brian T. Duong [personal information]; Bob Boyle [personal information]; Michael Stephens [personal information]; Zain Raheel [personal information]  
**Cc:** Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]; Brianne Snowden [personal information]  
**From:** Cindy Rzepecki [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E055E7B27C644696B39C29285F3FBFE0-CINDY GRAHA]  
**Sent:** Thur 3/11/2021 3:43:16 PM (UTC-08:00)  
**Subject:** RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential: [Questions - AML Practices - Point in Time - 2021-03-11.pdf](#)

Hello,  
Please see attached for separate document, for discussion on our call tonight.

Cindy

--  
Cindy Rzepecki, CPA, CA, CBV, CFE | Manager

Ernst & Young LLP  
Office: [personal information]

\*Unless this is an urgent message, please do not feel obligated to respond while on vacation, or if it is the weekend, or outside of traditional working hours

-----Original Message-----  
From: Brian T. Duong [personal information] >  
Sent: Tuesday, March 9, 2021 2:41 PM  
To: Bob Boyle [personal information]; Michael Stephens [personal information]; Cindy Rzepecki [personal information]; Zain Raheel [personal information]  
Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]  
Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Dear Bob -

Let's plan for 4pm PST Thursday. The call-in details are set out below. I'll send out a calendar invite as well.

Regards,

Brian

-

\*Moderator Conference Access code: [personal information] \*Participant Conference Access code: [personal information]

50 phone lines max.

Dial in Numbers for Participants:

- \* Dial-in Number: [personal information] (Lower Mainland)
- \* Dial-in Number: [personal information] (Calgary)
- \* Dial-in Number: [personal information] (Edmonton)
- \* Dial-in Number: [personal information] (Toronto)
- \* Dial-in Number: [personal information] (Ottawa)
- \* Dial-in Number: [personal information] (Montreal)
- \* Dial-in Number: [personal information] (US & Canada)
- \* International calls use dial in [personal information] (should be dialed as: [personal information]; there is no '1' before the 800)

-----Original Message-----  
From: Bob Boyle [personal information] >  
Sent: March 8, 2021 2:55 PM  
To: Brian T. Duong [personal information]; Michael Stephens [personal information]; Cindy Rzepecki [personal information]; Zain Raheel [personal information]  
Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]

Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Hi Brian,

Hope you had a good weekend. We have good availability 1-2 PM PST and then after 3 PM PST on Thursday. Thank you.

Best,

Bob Boyle

Bob Boyle | Senior Manager | Assurance Services | Forensic & Integrity Services

Ernst & Young LLP

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Website: <http://www.ey.com>

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

From: Brian T. Duong <personal information>

Sent: Saturday, March 6, 2021 4:28 PM

To: Bob Boyle <personal information>; Michael Stephens <personal information>; Cindy Rzepecki

<personal information>; Zain Raheel <personal information>

Cc: Shannon P. Ramsay <personal information>; Peter Law <personal information>; William B. Smart

<personal information>

Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Dear Bob and the team -

Following on our call yesterday, would you be able to get together for another call next Thursday March 11? Please provide us with your available times that day.

Regards,

Brian

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

From: Brian T. Duong

Sent: March 5, 2021 9:21 AM

To: 'Bob Boyle' <personal information>; Michael Stephens <personal information>; Cindy Rzepecki

<personal information>; Zain Raheel <personal information>

Cc: Shannon P. Ramsay <personal information>; Peter Law <personal information>; William B. Smart

<personal information>

Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Dear Bob -

11AM PST works, below are the call in details.

Regards,

Brian

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\* Moderator Conference Access code: personal information

\* Participant Conference Access code: personal information

50 phone lines max.

Dial in Numbers for Participants:

- \* Dial-in Number: [personal information] (Lower Mainland)
- \* Dial-in Number: [personal information] (Calgary)
- \* Dial-in Number: [personal information] (Edmonton)
- \* Dial-in Number: [personal information] (Toronto)
- \* Dial-in Number: [personal information] (Ottawa)
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-----Original Message-----

From: Bob Boyle [personal information] >  
 Sent: March 4, 2021 1:14 PM  
 To: Brian T. Duong <[personal information]>; Michael Stephens [personal information] >; Cindy Rzepecki [personal information] >; Zain Raheel <[personal information]>  
 Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]  
 Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Hi Brian,  
 Friday is currently challenging with schedules, but we could do 11 AM PST for a quick call. Otherwise, we have good flexibility on our end Monday after Noon PST. Let us know what works best. Thank you.

Best,  
 Bob Boyle

Bob Boyle | Senior Manager | Assurance Services | Forensic & Integrity Services

Ernst & Young LLP

[personal information]

Office: [personal information] | Fax: [personal information] | [personal information]

Cell: [personal information]

Website: <http://www.ey.com>

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

From: Brian T. Duong [personal information] >  
 Sent: Wednesday, March 3, 2021 7:23 PM  
 To: Bob Boyle [personal information] >; Michael Stephens [personal information] >; Cindy Rzepecki [personal information] >; Zain Raheel [personal information]  
 Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]  
 Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Dear Bob -

Thanks for the update and budget. I'd like to propose a quick call (15 minutes or so) on Friday just to discuss the questions, timing, and close any other loose ends. Would you (and your team) be available sometime between 10-2pm PST on Friday for this call?

Regards,

Brian

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

From: Bob Boyle [personal information] >  
Sent: March 3, 2021 2:04 PM  
To: Michael Stephens [personal information]; Cindy Rzepecki [personal information]; Zain Raheel [personal information]  
Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]; Brian T. Duong [personal information]  
Subject: RE: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Hi Michael,

Please see attached for the draft budget estimates we have compiled based on our recent discussions around the work for both workstreams of questions. Please let us know if there are any questions regarding the estimates or if you'd like to walk through any aspects of them or the assumptions.

In addition, as an update, we are gathering and reviewing our source documentation around the questions and will look to set up a touch point to discuss these later next week. We have some suggestions regarding revisions to the questions to align to the information we plan to provide around these and to focus the content and will share these proposed revisions ahead of discussing.

Please let us know if there are any questions or items to cover in the meantime as we continue our work. Thank you.

Best,

Bob Boyle

Bob Boyle | Senior Manager | Assurance Services | Forensic & Integrity Services

Ernst & Young LLP

[personal information]

Office: [personal] | Fax: [personal] | [personal]

Cell: [personal]

Website: <http://www.ey.com>

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

From: Michael Stephens [personal information] >  
Sent: Thursday, February 25, 2021 5:10 PM  
To: Cindy Rzepecki [personal information]; Bob Boyle [personal information]; Zain Raheel [personal information]  
Cc: Shannon P. Ramsay [personal information]; Peter Law [personal information]; William B. Smart [personal information]; Brian T. Duong [personal information]  
Subject: [100% known Play] BCLC - Commission of Inquiry into Money Laundering in BC --Privileged and Confidential:

Bob and EY team: Please find attached a draft memo to EY with questions for BCLC regarding 100% known play (and 100% carded play), for your review and our discussion. Best regards,

Mike

\*\*\*\*\*

K. Michael Stephens  
HUNTER LITIGATION CHAMBERS LAW CORP.  
[personal information]

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Any tax advice in this e-mail should be considered in the context of the tax services we are providing to you. Preliminary tax advice should not be relied upon and may be insufficient for penalty protection.

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Any tax advice in this e-mail should be considered in the context of the tax services we are providing to you. Preliminary tax advice should not be relied upon and may be insufficient for penalty protection.

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# AML Practices - Point in Time

The following general definitions apply to the questions:

“**Gaming Jurisdictions**” – Canada, United States, European Union, or Macau

“**Time Period**” – January 1, 2014 to December 31, 2020

## Buy-in Refusal Practices

### Question #1

Original Wording	Revised Wording
Please advise whether any gaming jurisdiction has ever had a general rule prohibiting the amount of cash buy-in by any patron over a certain dollar threshold (or otherwise prescribing the amount of a cash buy in). And if so, when.	Please advise if the Gaming Jurisdictions had a regulation prohibiting the amount of cash buy-in by patrons over a certain dollar threshold (or otherwise prescribing the amount of a cash buy in), during the Time Period. If so, when was this put in place and became applicable?

### Question #2

Original Wording	Revised Wording
Please advise whether any gaming jurisdiction has ever had a rule prohibiting the amount of cash buy-in in \$20 denominations by a patron over a certain dollar threshold (absent other indicators of suspicious activity). And if so when.	Please advise if the Gaming Jurisdictions had a regulation prohibiting the amount of cash buy-in of \$20 denominations by a patron over a certain dollar threshold (absent other indicators of suspicious activity required in the Gaming Jurisdictions), during the Time Period. If so, when was this put in place and became applicable?

### Question #3

Original Wording	Revised Wording
Please advise whether any gaming jurisdiction has ever had a rule barring a patron from play if the patron exceeds a certain number of Suspicious Transaction Reports or the equivalent type of report outside of Canada. If so, when.	Please advise if the Gaming Jurisdictions had a regulatory obligation establishing a rule barring patrons from play if the patrons exceed a certain number of Suspicious Transaction Reports or the equivalent type of reports outside of Canada during the Time Period. If so, when was this put in place and became applicable?

### Question #4

Original Wording	Revised Wording
Please advise whether in October 2016 any gaming jurisdiction had a directive to casino staff requiring that a cash buy-in at a casino be refused if 'suspicious behaviour' is observed by staff – which would include a	Please advise if the Gaming Jurisdictions had a regulatory obligation to casino staff requiring that a cash buy-in at a casino be refused if 'suspicious behaviour' is observed by staff – which would include a live-monitored drop off of cash by another person in October 2016.



live-monitored drop off cash by another person. If so, when.	
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## Source of Funds Practices

### Question #5

Original Wording	Revised Wording
Please advise whether in January 2018 any gaming jurisdiction had a directive that all cash and bearer monetary instruments (bank drafts/certified cheques) of \$10,000 or more required a source of funds receipt (confirming their ownership of the funds) by the patron prior to acceptance for buy in at a gaming facility.	Please advise if the Gaming Jurisdictions had a regulatory obligation that cash and bearer monetary instruments (bank drafts/certified cheques) of \$10,000 or more required a source of funds receipt (confirming their ownership of the funds) by the patron prior to acceptance for buy-in at a gaming facility in January 2018.

### Question #5a

Original Wording	Revised Wording
Please advise whether in March 2018 any gaming jurisdiction prohibited the use of a money service business as proof of source of funds receipting, for either cash or any monetary instrument including deposits to PGF accounts.	Please advise if the Gaming Jurisdictions had a regulation or directive to prohibit the use of a money service business as proof of source of funds receipting, for either cash or monetary instruments, including deposits to PGF accounts or PGF account equivalents in March 2018.

### Question #6

Original Wording	Revised Wording
Please advise whether in November 2014 or August 2015 any gaming jurisdiction engaged in a practice of placing certain high risk patrons on sourced cash/chip conditions – i.e. requiring that (a) a cash buy in at any amount be accompanied by proof of withdrawal from an accredited financial institution within the previous two business days, or (b) a buy in with chips must either be verified by the site as having been the subject of a previous verified win or be verified by the site by conducting a player interview as to the source of the chips.	Please advise if you are aware of casino operators in the Gaming Jurisdictions that engaged in the practice of placing certain high risk patrons on sourced cash/chip conditions in November 2014 or August 2015 – i.e. requiring that (a) a cash buy in be accompanied by proof of withdrawal from an accredited financial institution within the previous two business days, or (b) a buy in with chips must either be verified by the site as having been the subject of a previous verified win or be verified by the site by conducting a player interview as to the source of the chips.

### Question #7

Original Wording	Revised Wording
Please advise whether in May 2016 any gaming jurisdiction utilized questionnaires for certain high risk patrons at buy-in requiring casino staff ask the player for the source of	Please advise if you are aware of casino operators in the Gaming Jurisdictions that utilized questionnaires for certain patrons at buy-in that required the casino staff asking the patron for the

their funds for the cash buy in and to document the response?	source of their funds for the cash buy-in and to document the response in May 2016?
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## Patron Interviews

### Question #8

Original Wording	Revised Wording
Please advise whether in April 2015 any gaming operators responsible for conducting and managing gaming in any gaming jurisdiction conducted interviews of patrons regarding the source of funds, details of cash facilitators, or other intelligence information, and to educate them as to the risks of using cash facilitators and the availability of non-cash options for buying in, with a view to determining if further sanctions (including barring) may be appropriate?	Please advise whether in if you are aware of casino operators in the Gaming Jurisdictions that conducted interviews of patrons regarding their source of funds, details of cash facilitators, or other due diligence information, in April 2015. In addition are you aware of casino operators that educated patrons as to the risks of using cash facilitators and the availability of non-cash options for buy-ins?

### Question #8a

Original Wording	Revised Wording
Please advise whether in 2015 any gaming regulator or law enforcement body in any gaming jurisdiction conducted interviews of patrons at time of buy-in at a gaming facility regarding the source of their funds used for buying in?	Please advise if you are aware of casino operators in the Gaming Jurisdictions that had a regulator or law enforcement body that conducted interviews of patrons at the time of buy-in at the gaming facility, specifically regarding their source of their funds used for buy-ins in 2015.

## Patron Gaming Fund Accounts

### Question #9

Original Wording	Revised Wording
Please advise whether in April 2012 any gaming jurisdictions used account-based gaming for land-based gaming facilities (Patron Gaming Fund accounts), that facilitated non-cash buy-ins through the transfer of funds into a gaming account from an accredited financial institution. If the answer to this question is yes, did the transfer of funds into the gaming account require a declaration by the player as to the source of the funds?	Please advise if you are aware of casino operators in the Gaming Jurisdictions that used account-based gaming for land-based gaming facilities (Patron Gaming Fund accounts or PGF equivalents), that facilitated non-cash buy-ins through the transfer of funds into a gaming account from an accredited financial institution in April 2012. If the answer to this question is yes, did the transfer of funds into the gaming account require a declaration by the patron as to the source of the funds?



## General

### Question #10

Original Wording	Revised Wording
Having regard to the responses provided to the questions above, and the Statement of Assumptions provided to you, please describe how BCLC AML practices compare as against best practices documents which have been promulgated by any regulatory or gaming industry body in respect of AML practices for gaming facilities in other gaming jurisdictions.	In the context of the responses provided to the previous questions, and the Statement of Assumptions provided to you, please identify the the BCLC AML practices that compare to the practices described in your answers to the previous questions. .

### Question #11

Original Wording	Revised Wording
In responding to the questions above, please differentiate as between AML rules or practices which are imposed or engaged in by a gaming regulator, as opposed rules, directions or practices engaged in by a casino operator (like BCLC) which itself conducts and manages gaming.	[To Discuss]

### Question #12

Original Wording	Revised Wording
In answering the questions above relating to practices in other gaming jurisdictions, please include in your review the AML practices in the Province of Ontario and comparable jurisdictions where high limit play is available.	[To Discuss]