

Business Case for the expansion of

**INTEGRATED ILLEGAL GAMING
ENFORCEMENT TEAM
(IIGET)**

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EXECUTIVE SUMMARY

With the IIGET MOU scheduled for renewal effective 08APR01, consideration must be given to the current resourcing levels allotted to this integrated unit. IIGET was created in 2003 with an establishment of twelve regular members of the RCMP and one public servant.

An increase in police resources with a proportional increase in support staff will permit a more complete range of service delivery from IIGET. This will ensure that all three levels of illegal gaming enforcement are addressed. IIGET will then be positioned to comply with the terms and conditions of the MOU.

It is proposed that a substantial increase in the establishment of IIGET will produce a corresponding increase in enforcement results at all levels of illegal gaming throughout British Columbia. This will result in an increase in safety and security for the citizens of this province whose lives are affected by the gaming industry.

Two alternative resource packages in addition to the existing model are itemized within this document, with accompanying rationale. It is strongly felt that Option "A" will best meet the expectations and needs of our client agencies and the citizens of British Columbia.

ISSUE:

The IIGET MOU is scheduled for renewal in eight (8) months. To satisfy the terms of the MOU and deliver a comprehensive level of service to British Columbians, IIGET must receive an establishment increase upon renewal of its mandate.

HISTORY OF THIS ISSUE

IIGET was created in 2003 on the basis of three founding principles:

- i) Enforcement
- ii) Intelligence
- iii) Education

The expectations for service delivery for IIGET are considerable and justified. In conjunction with Gaming Policy Enforcement Branch (GPEB), the RCMP component within IIGET is responsible for three tiers of enforcement. As reported to the IIGET Consultative Board, these tiers are represented as follows:

- a) Street Level - Texas Hold 'Em in licenced premises, raffles, bingos, etc. (IIGET - GPEB responsibility)
- b) Mid Level - Common Gaming Houses, VGM clusters, Pyramid Schemes and animal fights (IIGET - RCMP responsibility)
- c) High Level - Internet Gaming, VGM Distribution., Bookmaking (IIGET - RCMP responsibility)

These various levels are based upon three criteria:

- a) public risk
- b) investigative complexity
- c) resources required to interdict

The most recent direction received from the IIGET Consultative Board has been to place emphasis upon the more visible mid level enforcement targets throughout the province. This has resulted in an enforcement campaign which has targeted Common Gaming Houses throughout British Columbia. At this writing, IIGET has collapsed eight (8) Common Gaming Houses since this direction was received in December of 2006, four (4) of them prosecutionally. Criminal Code convictions (including Fraud) were recently rendered in BC Supreme Court as a result of a pyramid scheme taken down by IIGET. Other mid level targets remain the subject of ongoing investigations by this unit. Street level enforcement efforts continue to be maintained by partner agency GPEB.

Compliance with this directive from the Consultative Board is not without consequence. Current resourcing levels will permit a concentration upon mid level initiatives, however, IIGET is

unable to also satisfy the mandate with respect to high level enforcement targets as set out within the MOU. IIGET has the expertise, experience and will to successfully target criminal groups which are active in bookmaking, internet gaming and VGM distribution. We just don't have the people.

An increase in police resources will permit a more complete range of service delivery from IIGET, to ensure that all three levels of illegal gaming enforcement are addressed. In this way, the terms of the IIGET MOU will be satisfied.

Operationally, the IIGET Consultative Board has received consistent reporting from a succession of unit commanders. This integrated unit, while founded upon the three tenets of enforcement, intelligence and education, is expected to deliver measurable enforcement results impacting low, medium and high level targets. At current resource levels, IIGET is capable of addressing two of these, while unable to target at the high level. It is unlikely that high level gaming targets will be among those selected for targeting by CFSEU or any other similarly mandated unit. As a result, it naturally falls to IIGET to target at this level. At current resource levels, however, IIGET is positioned to target at the medium or high enforcement levels, but not both.

DESCRIPTION OF CURRENT POLICING RESPONSE

With the exception of the IIGET unit, very little attention is paid to illegal gaming activity by police agencies in British Columbia.. While this is traditionally viewed as a "vice" offence other, more visible forms of criminal activity tend to be the priority of units which might be mandated to look after this broad category of offences.

IIGET's thirteen full time employees are positioned as follows:

LMD:	7 in Burnaby Metrotown (including 1 CR 04).
North District:	2 in Prince George
South East District:	2 in Kelowna
Island District:	2 in Victoria

All personnel are familiar with the founding principles of enforcement, intelligence and education. They are deployed accordingly by the unit commander. Intelligence gathering remains a priority for this unit, V2: Police Investigative Technique

A criminal intelligence analyst has been retained on contract until 08MAR31 to collate and coordinate the volumes of information gathered. V2: Police

Investigative IIGET has a number of open investigations which are focused upon locations within these jurisdictions. In light of this, it is felt that an integrated model incorporating municipal police resources merits serious consideration.

IIGET operates on a project basis, with eight ongoing projects in progress throughout the province at the present time. The NCO in charge is the Team Commander for all of these investigations, which operate under the the Major Case Management model. V2: [REDACTED] Police [REDACTED] To achieve successful results, even mid level projects consume significant resources. Within the current funding model, IIGET is impeded less by financial restriction than by manpower limitations.

The IIGET unit commander has approximately 24,000 hours available each year to achieve the objectives established within the IIGET MOU. To take each major case through to conviction, at least half of the hours invested are spent subsequent to arrest.

In an effort to demonstrate in numerical terms how much time is necessary to allot to various categories of illegal gaming investigation, examples are set out below:

Mid level - Pyramid Schemes:	4000 - 5000 hours
- Common Gaming House	1500 - 2000 hours
- VGM clusters	500 hours
- Animal Fights	2000 hours
High level - Bookmaking	> 20,000 hours
- Internet Gaming	> 20,000 hours
- VGM Distribution	> 20,000 hours

V2: Police Investigative Technique [REDACTED]

[REDACTED] this unit with its illegal gaming mandate is a low priority relative to units which are responsible for the investigation of violent crime. V2: Police Investigative Technique [REDACTED]

[REDACTED] This directive is respected, with the knowledge that this will directly impact our investigative capacity. V2: Police Investigative Technique [REDACTED]

[REDACTED] IIGET is absolutely capable of succeeding against these targets, but not at current levels of resourcing.

PROJECTED OUTCOME IF CURRENT SITUATION CONTINUES

The principle consequence of the resourcing level which currently applies to IIGET is that the delivery of police services is limited to the point where this unit is unable to target at both the medium and high levels simultaneously. While attacking visible mid range targets such as

pyramid schemes or common gaming houses is newsworthy, this results in IIGET being less able to focus upon the senior organized crime level. Conversely, if IIGET at current resourcing levels were to concentrate on a high level target, other meaningful mid level targets could receive inadequate attention for extended periods. As these mid level targets are often visible to the public and the media, confidence in government and its policing institutions could be negatively impacted. With a reasonable increase in resources, IIGET is well positioned to address all levels of illegal gaming within the province of British Columbia. Should such an increase go unsupported, it may be necessary to reconsider the breadth and scope of the mandate.

While it is recognized that a criminal intelligence analyst position had been created within the initial IIGET model, the decision to convert this to an RM position at that time was justified. This unit has evolved to the point where an indeterminate intelligence analyst position is compulsory. The volume and complexity of criminal intelligence being gathered by IIGET personnel justifies this position. Illegal gaming is recognized by a number of senior organized crime groups as a preferred strategic direction. This is demonstrated primarily by Traditional (Italian) Organized Crime, Asian Organized Crime, Eastern European Organized Crime and, most recently, Outlaw Motorcycle Gangs. The benefit to the delivery of professional police services by "E" Division requires that this be achieved. The OPP experience must be considered in considering the intelligence benefits of a committed illegal gaming section. Senior OPP officials have remarked upon the value of criminal intelligence gathered as a result of gaming investigations, dealing with a broad spectrum of criminal activity. This criminal genre is populated by many of the top criminal entrepreneurs identified within the Provincial Threat Assessment on Organized Crime - 2007 edition. Recent discussions with senior DCAS managers have resulted in a commitment to include the contractually-retained analyst from IIGET in a provincial initiative to explore the links involving loansharking, kidnappings, extortions and other forms of violent crime within a gaming context. The linkages are irrefutable. The creation of a permanent criminal intelligence analyst position is a component which is crucial to this submission.

Option A: (An increase of 12 FTEs)

LMD: Unit Commander - S/Sgt.
 Team A: Sgt / Cpl / 4 Csts
 Team B: Sgt / Cpl / 4 Csts
 . 1 Criminal Intelligence Analyst
 2 Clerical Staff (CR 04s)

All 3 Outlying District offices: 1 Cpl & 2 Csts

Total Cost (including Direct, Indirect & one time Start Up costs): \$3,846,274

Option B: (An increase of 10 FTEs)

LMD: Unit Commander - S/Sgt.
 Team A: Sgt / Cpl / 3 Csts
 Team B: Sgt / Cpl / 3 Csts
 1 Criminal Intelligence Analyst
 2 Clerical staff (2 CR 04s)

All 3 Outlying District offices: 1 Cpl & 2 Csts for each.

Total Cost (including Direct, Indirect & one time Start Up costs): \$3,481,260

Option C: Status quo. 12 RMs and one CR 04

Total Cost (including Direct & Indirect, but no Start Up costs): \$1,770,388

NOTE: Space requirements in the LMD office are sufficient to absorb these new personnel. Outlying District offices in Kelowna and Prince George are able to accommodate with minor fit ups. The Victoria office has space limitations, however, something will be worked out by positioning the two constables in one large office.

RECOMMENDATIONS:

Option A: \$3,846,274

Option B: \$3,481,260 Less Desirable.

Option C: \$1,770,388 Status Quo.

Recommendation of Submitting Member:

Option A