

To: Gabriele, Anna [REDACTED]
Cc: Hamers, John [REDACTED] Hellen, Amy L [REDACTED]
From: Doherty, Kevin [REDACTED]
Sent: Fri 6/21/2019 4:46:23 PM (UTC-04:00)
Subject: RE: Project ATHENA

Hi Anna
Thanks for the summary and the chat earlier.
To confirm our conversation, no action required on Project Athena at this time. As a FIU team, we are still determining with Mike B and GSET the appropriate way to deal with initiatives like Athena. As for the Vancouver meeting, I will speak with Amy and we will determine attendance going forward.

Kevin Doherty | Head of Canadian FIU | Global Anti-Money Laundering

95 Wellington St West, 15th Floor
Toronto, ON
[REDACTED]

Internal

From: Gabriele, Anna
Sent: Friday, June 21, 2019 10:25 AM
To: Doherty, Kevin [REDACTED]
Cc: Hamers, John [REDACTED]
Subject: RE: Project ATHENA

Hi Kevin,

[REDACTED]

As per the information below, there was a total of [REDACTED] TD Bank drafts sold and presented to the various casinos in B.C.

- [REDACTED] in February
- [REDACTED] in March
- [REDACTED] in April

Do you have any further updates from Caitlin on that status of having the purchaser's name added to every TD Bank Draft that's purchased?

The next meeting is scheduled for Wednesday July 24 at the RCMP Head Quarters in Vancouver, let me know how you wish to proceed, as it's better to book early as the cost of the flight is lower.

Let me know if you have any questions.

Thanks,

Anna Gabriele, CAMS | AML Manager | Global AML | FIU - High Risk Customer Group
[REDACTED]

NOTICE: Confidential message which may be privileged. Unauthorized use/disclosure prohibited. If received in error, go to www.td.com/legal for instructions

From: Paddon, Melanie [REDACTED]
Sent: Monday, June 17, 2019 12:08 PM
To: Gabriele, Anna
Subject: Project ATHENA

CAUTION: EXTERNAL MAIL. DO NOT CLICK ON LINKS OR OPEN ATTACHMENTS YOU DO NOT TRUST
ATTENTION : COURRIEL EXTERNE. NE CLIQUEZ PAS SUR DES LIENS ET N'OUVREZ PAS DE PIÈCES JOINTES AUXQUELS VOUS NE FAITEZ PAS FIANCER.

TD000017_0001

Hi Anna,

The list of casino patrons is in for February, March and April 2019.

The total bank drafts purchased from all financial institutions and tendered at the casinos in February [REDACTED] March [REDACTED] and April [REDACTED]

Of those bank drafts, in February [REDACTED] March [REDACTED] and April [REDACTED] were issued by TD.

Using the criteria of [REDACTED] I have identified TD patrons that either fit the criteria or are using a high number of drafts purchased from TD.

I have detailed my findings in the table below.

February 2019

| Casino Patron | Birthdate | Total Drafts Purchased from TD | Using other banks including TD during this month | Total Value of Drafts from TD | Casino High Risk Cash conditions |
|-------------------------|------------|--------------------------------|--|-------------------------------|----------------------------------|
| Personal/Private | [REDACTED] | [REDACTED] | Yes [REDACTED] | [REDACTED] | HR/CC |
| | [REDACTED] | [REDACTED] | Yes [REDACTED] | [REDACTED] | HR |
| | [REDACTED] | [REDACTED] | Yes [REDACTED] | [REDACTED] | HR |
| | [REDACTED] | [REDACTED] | Yes [REDACTED] | [REDACTED] | HR |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | HR/CC* |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | - |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | - |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | - |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | HR/CC |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | CC |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | HR |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | HR |
| | [REDACTED] | [REDACTED] | Yes [REDACTED] | [REDACTED] | - |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | HR/CC |
| | [REDACTED] | [REDACTED] | No | [REDACTED] | - |
| [REDACTED] | [REDACTED] | No | [REDACTED] | - | |

Note: HR - high risk, CC – cash conditions

*Does not produce Bank Draft Receipt at Casino

March 2019

| Casino Patron | Birthdate | Total Drafts Purchased from TD | Using other banks including TD during this month | Total Value of Drafts from TD | Casino High Risk Cash conditions |
|-------------------------|-----------|--------------------------------|--|-------------------------------|----------------------------------|
| Personal/Private | | | Yes [Redacted] | | HR/CC |
| | | | No | | HR/CC |
| | | | No | | HR/CC |
| | | | No | | CC |
| | | | No | | - |
| | | | No | | - |
| | | | No | | - |
| | | | Yes-TD | | HR |
| | | | Yes- [Redacted] | | HR/CC |
| | | | Yes- [Redacted] | | HR |
| | | | Yes- [Redacted] | | HR |
| | | | Yes- [Redacted] | | - |
| | | | Yes- [Redacted] | | HR |
| | | | Yes- [Redacted] | | HR |
| | | | No | | CC |
| No | CC* | | | | |
| No | - | | | | |
| No | HR/CC | | | | |

Note: *Does not produce Bank Draft Receipt at Casino

April 2019

| Casino Patron | Birthdate | Total Drafts Purchased from TD | Using other banks including TD during this month | Total Value of Drafts from TD | Casino High Risk Cash conditions |
|-------------------------|-----------|--------------------------------|--|-------------------------------|----------------------------------|
| Personal/Private | | | Yes [Redacted] | | HR/CC |

| | | | |
|-------------------------|------|--|-------|
| Personal/Private | Yes- | | HR/CC |
| | Yes- | | - |
| | No | | - |
| | Yes- | | HR |
| | Yes- | | HR/CC |
| | Yes- | | - |
| | No | | HR/CC |
| | No | | - |
| | No | | CC |
| | No | | - |

Please check to see if they have a bank accounts with TD. When searching some patrons hyphenate their names, others don't so if searched both ways it may eliminate errors as to whether or not the patron has an account. It would also be helpful to JIGIT to know if the patron is "de-marketed" by your institution which would assist in measuring the effectiveness of information sharing on Project ATHENA.

Project ATHENA came to fruition in January 2018.

I have attached the Bank Draft numbers for the months March and April 2019.

Melanie

Melanie PADDON
Investigator, Joint Illegal Gaming Investigation Team
Combined Forces Special Enforcement Unit – BC

