

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Tuesday, September 18, 2018

Meeting Time: 8:15am – 9:00 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas St. & via conference call

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Shauna Brouwer, FIN (*regrets*)
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Jeff Groot, AG
- Rob Kroeker, BCLC (Guest)
- Anna Fitzgerald, GPEB (Guest)

MINUTES

1. Approval of Agenda

No changes to the agenda.

2. State of AML

Rob and Anna gave presentation on the state of money laundering and anti-money laundering efforts. DMC representatives asked questions for clarification throughout.

3. Priority and sequencing of recommendations

Mark asked about planned approach on recommendations and the role the DMC would play in that process. Doug and Jeff provided context that phase 2 deliverables include working up options for decision/direction by DMC before a recommended approach is taken forward to the responsible ministers and/or Cabinet.

Noting the time, the DMC requested that any further edits or approvals on this item be coordinated offline.

Item 4 was requested to be brought forward to the next meeting.

The meeting ended at 9:07 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Tuesday, October 16, 2018

Meeting Time: 8:15am – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Shauna Brouwer, FIN
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Jeff Groot, AG
- Rob Kroeker, BCLC (Guest)
- Tim Storms, GPEB (Guest)
- Doug Mayer, GPEB (Guest)

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda. Previous meeting's minutes were approved.

2. DMC Terms of Reference

Doug asked a question about whether the lead organization for R2 should be AMLS. It was determined that GPEB would continue to lead it for now and it could be reassessed at a later date.

DMC approved the terms of reference.

3. Priority and Sequencing of Recommendations

Discussion occurred about ensuring the root cause(s) of the recommendations are understood and targeted when determining how best to respond to them. Specifically, that an evidence-based approach is required in order to identify what problem the recommendation intends to solve.

DMC approved the priority/sequencing document.

4. Phase 2 Milestones & Timeline

Discussion took place related to how the approach for R27 and R37 (and dependencies) would likely not fit within the current budget cycle and consideration must be given to an interim funding approach, depending on the direction received from Cabinet.

Jeff and Jillian also clarified for the DMC that discussions related to R37 were in the early stages with PSB, and the plan is to come back to DMC for direction on options that would then be further developed for decision.

Lori emphasized the need for data and analysis will be critical in determining how the recommendations will be addressed.

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DMC received the milestone/timeline document for information.

5. Current Risks to ML

Doug M, Tim and Rob presented on the areas that GPEB and BCLC have identified as possible vulnerabilities for money laundering.

Action item 1: that GPEB and BCLC update the flow chart of vulnerabilities to show a potential future state based on the options identified for R27.

Action item 2: that GPEB and BCLC consider the vulnerabilities and create a summary of how those could be addressed, including the scale of the vulnerability (quantum) and potential return on investment where actions are identified.

6. High-level Options for R27

Jillian briefed the DMC on the proposed options for R27. DMC approved the options in principle, with the understanding that further work would be undertaken to bring those forward in a decision document.

This additional work would include a clear understanding of the problem that is to be addressed, and an evidence-based approach to compare and contrast the options.

7. BCLC Policies and Procedures Update

Noting the time, DMC agreed to receive this information via briefing note.

8. Other Updates:

It was determined that any decision on JIGIT funding (8b) also requires consultation with PSSG and FIN. GPEB agreed to share information and receive feedback from those ministries.

The coordinated communications approach (8d) was also shared for information.

The remaining agenda items were not covered, due to the time.

The meeting ended at 9:49 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Friday, October 25, 2019

Meeting Time: 8:15 am – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street
Or tele-conference details

Meeting Participants:

- Doug Scott, AG
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Christina Dawkins, FIN
- Wayne Rideout, PSSG (guest)
- Megan Harris, AG ADMO
- Jennifer Gallaway, BCLC (guest)
- Anna Fitzgerald GPEB (guest)
- Jillian Hazel, GPEB (guest)
- Paul Flannigan, FIN (guest)

MINUTES

(GPEB and BCLC present) - 8:15 am

1. Approval of agenda – Doug (1 min)
 - a. No change to the agenda.
2. Money Service Business Presentation – Chris (25 min)
 - a. Provided presentation with background and upcoming timelines.
Action Item: Circulate whitepaper to AML DMC.
3. State of money laundering in casinos- Jillian (22 min)
 - a. Handout provided.
 - b. Potential vulnerabilities and work/analysis underway.
4. AML Communications Strategy update – Megan (2 min)
 - a. Work is underway to have a Communications strategy planning 1 -2 years out.
 - b. No updates to the existing communications plan.
 - c. GCPE will take inventory of activity in progress (German Reports/Finance Initiatives, etc.) and the respective target completions to determine end communication goals
 - d. Megan provided an update on the inquiry.

In Camera (BCLC Excused) – 9:20 am

5. Gambling regulatory framework, standards, and compliance – Jillian (47 min)
 - a. Handout Provided.

Meeting adjourned at 9:47am

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Tuesday, November 20, 2018

Meeting Time: 8:15am – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG
- Jeff Groot (Guest)
- Brad Desmarais, BCLC (Guest)

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda. Previous meeting's minutes were approved.

2. Real estate money laundering DMC reporting process

Doug provided an overview.

3. Standards-based model

Jillian gave a presentation on recommendation 24 (that the casino industry transition to a standards-based model) and its dependents (#1, 2, 20, 25, 26, 31). Discussion around roles and responsibilities, and further clarity required to ensure accountability is understood and the impact standards could play on the operations and business side of BCLC. Exploring a “duty to consult” amendment was suggested. There continues to be the need to understand the regulator's authority over a crown, where authority rests, and identifying the decision maker.

If future framework is adopted, a look at the administrative review process will be required. It was recognized that this is only one piece that will impact future legislation amendments.

DECISION MADE: The regulator will be the regulator of BCLC and a standards-based model will be implemented.

4. Policing recommendations update/process

Megan provided an update on recent meetings with PSB around the recommendation of a DPU. PSB will bring forward an intelligence/data report to DMC in mid February on money laundering and/or the involvement/impact of organized crime in casinos. PSB is also preparing a costing model for DPU options.

5. Deloitte monitoring update

Jennifer provided an update on Deloitte work that began early to mid October along with a high-level overview of two weeks of audits and reports. Results are informing future action required with service providers. Audits will continue until it is felt that monitoring is sufficient and 100% compliance.

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Doug requested exploration into audits taking place at the cages and the potential for collusion.

6. Implementation risk registry

A new risk registry template was presented.

DECISION MADE: Risk registry template approved with minor amendments.

Action item 1: AMLS to work with GPEB and BCLC to complete the risk registry and bring back to DMC.

7. Milestones and timeline status update

Discussion took place that timelines are tight to meet the original schedule of a cabinet meeting in February.

Action item 2: AMLS to work with GPEB and BCLC to update timeline to ensure more realistic timeframe.

8. Completed recommendation approvals

Project completion forms were brought forward and approved for the following recommendations:

R4 – That BCLC re-enforce the importance of Service Providers not accepting cash or other reportable instruments if they are not satisfied with a source of funds declaration.

R12 - That a Transaction Analysis Team be developed to review all STRs and that the team be composed of a representative of the Regulator / DPU, JIGIT, and BCLC.

R13 - That the Transaction Analysis Team meet on at least a weekly basis to review all STRs and develop strategies to deal with each.

R16 - That BCLC not engage in further undercover operations, except in conjunction with the Regulator and, or the police.

R17 - That no further expense be incurred by BCLC with respect to the SAS AML software system.

R18 – That BCLC ensures that VIP hosts do not handle cash or chips.

R21 – That cash limits not be imposed on buy-ins.

R29 - That regulatory investigators continue to be Special Provincial Constables.

R44 – That the Provincial prosecution service ensure that it has prosecution counsel familiar with gaming law.

Discussion took place around GPEB auditing BCLC's recommendations.

Action item 3: DMC to confirm this decision.

The meeting ended at 9:45 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Thursday, December 13, 2018

Meeting Time: 8:00 am – 9:30 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG
- Michele Jaggi-Smith, GPEB (Guest)
- Dave Boychuk, GPEB (Guest)

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda.

APPROVED: Previous meeting's minutes were approved with notes below.

Action item #3 was confirmed; GPEB will conduct the audit in addition to BCLC's internal audit team. Verification process and audit for GPEB only recommendations will still need process confirmation.

BCLC Board would like an update at each board meeting on the status of the recommendations.

ACTION #1: Jennifer to provide AMLS with board dates.

ACTION #2: AMLS to provide BCLC with summary of recommendations ahead of each board meeting.

2. Overview of suggested future legislation

Michele Jaggi-Smith presented scope and timeline for future legislation.

Suggestion was made that consideration for Community Gaming Grants to be brought back into the fold of GPEB should be an option. Michele confirmed that this has been discussed and is ongoing.

Discussions taking place during the development of legislation should include any services that can help with corporate registration and certification. In addition, policy around compliance and unregulated online gambling need to be reviewed/developed.

APPROVED: Scope and timeline for legislation approved by DMC.

3. Briefing on regulator model

Jillian and Dave presented draft options for ministerial consideration of a future regulator model.

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*Meeting went in camera at 9:00 am. Jim and Jennifer exited the meeting.

*General meeting resumed at 9:20 am. Jim and Jennifer rejoined the meeting.

ACTION #3: AMLS to restructure the briefing note and share with DMC.

4. Update on Phase 2 German review and request for data

Megan provided a statistical update on information shared through tip portal between Nov. 18 and Dec. 12.

In the interest of time, further discussion around request for data was taken off line.

5. New BCLC policy implementation (>\$3K buy-in ID checks)

DMC had no concerns with proposed policy implementation.

All further items were deferred due to limited time.

The meeting ended at 9:30 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Monday, January 14, 2019

Meeting Time: 9:30 am – 10:00 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG
- Rob Kroeker, BCLC (guest)

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda.

APPROVED: Previous meeting's minutes were approved with notes below.

2. Review of ministerial decision on regulator model and next steps

Debrief discussion took place on conversation with Minister Eby regarding the regulator model. Option 1 and a move to an independent regulator office was supported. Minister requested the model be presented to Dr. German.

In a following meeting, Dr. German was presented with the model and gave his support to the development of the independent office since it is in the spirit of what he was proposing.

3. Deloitte SOF monitoring update

The most recent report received the week of January 7, shows almost 100% compliance at two properties, and concerns around remaining properties were addressed.

GPEB confirmed that formal letters were delivered, and financial sanctions would be the next directive.

4. AMLS milestone/timeline

Updated timeline was provided.

The meeting ended at 10:05 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Wednesday, February 20, 2019

Meeting Time: 8:15 – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda.

APPROVED: Previous meeting's minutes were approved.

2. AMLS milestone/timeline

Update provided on decision approval timing around the independent regulator office and the DPU:

- Minister will be presenting to P&A on March 7 with a general update on the report recommendations including support for moving forward with design and costing of an independent regulator office.
- DPU is currently under review and will be brought forward for DMC approval at April meeting.

3. Information briefing on data collected for DPU

Data collected and analyzed by GPEB and PSSG was presented and discussed. Data provided an understanding of the current state within the casinos.

The meeting proceeded to in-camera at 8:45 am. Jim Lightbody and Jennifer Gallaway exited the meeting.

The in-camera meeting concluded at 9:53 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Tuesday, March 19, 2019

Meeting Time: 8:15 am – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Jim Lightbody, BCLC
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG

MINUTES

1. Approval of Agenda and previous minutes

No changes to the agenda.

APPROVED: Previous meeting's minutes were approved.

2. Update from Cabinet P&A March 7 and next steps – Doug

- Discussion occurred around the presentation to Cabinet P&A committee. Support was provided for moving forward with an independent regulator office.
- Further Discussion centred around next steps and approvals required for an IO.
- AML DMC directed to proceed directly to TB and a return to Cabinet was not needed at this time. The TB request should be kept at the basic office to stand up with a decision before summer and the ability to stand up by fall and proceed to legislation drafting.
 - a. ACTION: AMLS to speak with Cab Ops/TB about removing Cabinet from the timeline

3. BCLC service provider contract remedies and escalation

- Discussion included percentage of service providers signing the OSA and contractual commitment for service providers to continually upgrade and dollar investment over 20 year period for maintenance and investments.

4. Impact on changes to FinTRAC reporting (R5/6)

- A briefing of German recommendations 5 and 6 and the review taken place so far.
- Noted that the decisions made on R5/6 would have an impact on other recommendations including role of regulator in AML going forward.
- FinTRAC noted to BCLC that it has concerns around the significant increase they would see if UFTs went straight to them. Based on 2017 numbers, this would be an 83% increase.
ACTION: BCLC to request written comments from FinTRAC on R5/6.
- It was noted that BCLC is using the data differently and mining the data to understand suspicious transactions.
- In previous FinTRAC report, it was stated that 3/700 UFTs should have been reported when in fact they were not.
- The proposed recommendation for R5/6 would be to continue as status quo. This also impacts recommendations 8, 9, part of 11.

ACTION: Return to AML DMC with a final briefing and decision on May 21.

ACTION: Following May 21 DMC, meet with Peter German to walk him through the decision.

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5. AMLS milestone/timeline

Updated timeline was provided.

6. Round table

BCLC

ACTION: BCLC to provide an update on EY report to AML DMC

ACTION: BCLC to share EY reports and BN with GCPE

Doug

- Discussion regarding outstanding BNs and UFTs
- Discussion around a cashless system in the media

ACTION: BCLC to provide AMLS with the total amount of cash flowing through casinos?

The meeting ended at 9:40 am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Thursday, May 2, 2019

Meeting Time: 8:00 am – 9:30 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street
Or via Skype conference details (below)

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Adam Kubel, Guest
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG - *regrets*
- Barbera Pearson (minutes)

MINUTES

1. Approval of Agenda and previous minutes.

- No Change to the agenda
- APPROVED: Meeting Minutes from March 19, 2019.
- Action Items from March 19th meeting discussed, and status update provided.
 - Action Item #2 = completed
 - Action Item #4 = pending – no update at this time.
- Decision made to cancel May 21st meeting due to scheduling conflicts – feedback and decisions to be managed via e-mail. Next regularly scheduled meeting is on June 18, 2019.

2. Briefing: Account based cashless gambling and AML enhancements – refer to PowerPoint Presentation provided by BCLC

- Discussion occurred around the risk for Anti-Money Laundering and problem gambling, compliance on paper-based tracking, controls for amounts over \$10,000 and system requirements for amounts under \$10,000
- AML Electronic Tracking System is currently available and operational in the US.
 - A similar system could be operational here in 12-18 months.
- FINTRAC announcing upcoming changes – 30 Day STR changing to three day STR.
- New System Options: (Account Based System – would require 2-3 years to be fully implemented)
 - Shift from cash to purchasing credits to be used for gaming.
 - The new system could be scaled beyond casino play. (Lottery, Grocery Store, Pubs, etc.,)
- Discussion occurred around the flow of cash through the electronic system
 - The SAS (system) is used to help monitor over players spending over \$10,000
 - FINTRAC requirements were not compatible with the SAS System
 - New proposed system is already operational in other casinos.

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Action Item: Provide the Minister's Office with draft numbers – AML Phase 1 = Approximately \$5-6 Billion and Account Based Play = tbd

3. Briefing: Unusual financial transaction (UFT) refusals – refer to Briefing Note

- Issue – stopping dirty money from coming into the casinos.
- Presentation focused on whether refusing all UFTs fixes the issue
- FINTRAC requirements = risk based model or standard based model (possible compliance issues based on the human element)

Action Item: GPEB & BCLC to provide the number of STR's that were actually refused.

4. German 1.0 recommendation definition and acceptance criteria – refer to handout provided

- Decision – the group supported the process as presented
 - Meetings were held with GPEB, BCLC & AMLS
 - Peter German has not been included in the meetings at this time.
 - The process is 80% complete

Action Item: Include Peter German in the discussion as soon as possible (as per Doug Scott)

5. German 1.0 recommendation implementation status – refer to handout provided

- Implementation status is on track.
- Independent Regulator Treasury Board Submission targeted for June 2019.
- DPU/FIIU concept will be discussed at the May 16, 2019 AMLS meeting.
- 19/49 recommendations (40% completion) by May 21, 2019.
- Next push is seven further recommendations by September 2019.
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6. AMLS communications plan - agenda item passed due to Megan Harris's absence.

7. Executive roadmap and timeline review

- Updated on April 15, 2019

Meeting adjourned at 9:30am

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Thursday, June 18, 2019

Meeting Time: 8:15am – 9:45am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street
Or via Skype conference details

Meeting Participants:

- Doug Scott, AG (Chair)
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Jim Lightbody, BCLC
- Adam Kubel, Guest
- Sam MacLeod, GPEB
- Jillian Hazel, GPEB
- Jennifer Gallaway, BCLC
- Megan Harris, AG
- Barbera Pearson (minutes)

MINUTES

1. Approval of Agenda and previous minutes.

- No Change to the agenda
- APPROVED: Meeting Minutes from May 2, 2019 with edits.
- Action Items from May 2nd meeting discussed, and status update provided.
 - Action Item #2 = completed
 - Action Item #3 = Number of Refused STR's = 233
 - Action Item #3 = Meeting to be scheduled with Peter German.
- Next Regularly scheduled meeting is on July 16, 2019.

2. Recommendation R5/6 discussion (R7, R8, R9, 11a impacted)

- Refer to Briefing Note # 558735 – Analysis of German recommendations related to casino reporting obligations to the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).
 - The briefing note was redrafted to reflect updated information including FINTRAC's response to BCLC requesting feedback on Dr. German's proposed process.
 - Peter German felt that the service providers already have the tools required to raise threshold levels of UFTs to that of an STR and to report directly to FINTRAC.
 - Service Providers do not support this proposed change.
 - FINTRAC reporting may move to a 3-day turnaround – this timeline is to be confirmed.
 - Can BCLC continue as status quo if FINTRAC moves from a 30 day to a 3 day reporting timeline?

Decision made on R5/6 – Option #1 to continue with current reporting structure and process approved

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- Further discussion regarding responsibility and unless there is a change in legislation the service providers do not hold ultimate responsibility.
- Concern was raised that if thresholds change for Service Provider reporting (moving from UFT thresholds to STR thresholds), there is a risk that not as many STRs will be filed.

Action Item: Meeting to be scheduled with Peter German to review recommended option with Dr. German

3. Recommendation 10 (Regulator/DPU access to iTRAK) discussion

- Peter German report recommendation to insert iTRAK Terminals into Gaming, Policy & Enforcement Branch (GPEB) offices.
- The systems contain a great deal of personal information.
- A Privacy Assessment was completed, and it was determined that this would be off side of current policy.

Solicitor/Client Privilege

Action Item: BCLC & GPEB to request a meeting with OCIO and obtain guidance.

4. Completion and closure report discussion

Completion report for interim recommendation #2 approved

5. Executive Roadmap and timeline review

- 15 of 48 recommendations have been addressed (this translates to 31% of the entire report being completed).
- Estimated that an additional 21 of the 48 recommendations to be addressed in July 2019 and approximately 70% by December 2019.

Meeting adjourned at 9:15am.

Deputy Minister's Committee on Anti-Money Laundering

Meeting Date: Tuesday, August 20, 2019

Meeting Time: 8:15 am – 9:45 am

Meeting Location: 11th Floor Executive Boardroom – 1001 Douglas Street
Or tele-conference details

Meeting Participants:

- Doug Scott, AG
- Lori Wanamaker, FIN
- Mark Sieben, PSSG
- Brenda Butterworth-Carr, PSSG (*regrets*)
- Christina Dawkins, FIN
- Megan Harris, AG
- Wayne Rideout (guest)
- Sam MacLeod, GPEB (guest)
- Jillian Hazel, GPEB (guest)
- Tom Steenvoorden PSSG (guest)
- Jim Lightbody, BCLC (guest)
- Jennifer Gallaway, BCLC (guest)
- Barbera Pearson (Notes/Timekeeper)

MINUTES

(GPEB and BCLC present)

1. Approval of agenda – Doug (1 min)
 - a. No change to the agenda.
2. BCLC Quarterly AML report – Jennifer (10 Min)
 - a. Handout provided.
 - b. General review of documents and roundtable discussion.
Action Item: Report format to be updated for the next quarter.
3. GPEB standards update/BCGIA commitments – Jillian (10 Min)
 - a. Handout provided.
 - b. General review of documents and roundtable discussion.
4. Legislative timeline – Jillian (15 Min)
 - a. Handout provided.
 - b. General review of documents and roundtable discussion.
5. 'Dirty Money' – Acceptance criteria document – Megan (2 Min)
 - a. Handout provided.
 - b. General review of documents and roundtable discussion.
Action Item: Bring forward the communications plan to the September 17, 2019 meeting for review and discussion.

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(AML DMC)

6. Approval of July 16 meeting minutes * – Doug (2 min)
 - a. Meeting minutes approved.
7. Project 'Athena' Update – Tom (20 Min)
 - a. Verbal update provided to the group by Tom Steenvoorden.
Action Item: Ministry of Finance has requested to join the project working group – Tom to facilitate this request.
8. Maloney report update – Christina (5 Min)
 - a. Verbal update provided to the group by Christina Dawkins.
9. AML strategy update – Megan (5 Min)
 - a. Verbal update provided to the group by Megan Harris.
10. Roundtable – Doug (10 Min)
 - a. No items for discussion.
Action Items: New Agenda Topics – going forward
Update on current state of money laundering in casinos
Update on the STR Policy Note

Meeting adjourned at 9:40am