

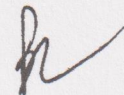
**COMMISSION OF INQUIRY INTO
MONEY LAUNDERING IN BRITISH COLUMBIA**

The Honourable Mr. Austin F. Cullen, Commissioner

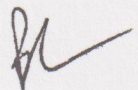
AFFIDAVIT

I, Bill Lang, with a business address of 4400 Dominion St #100, Burnaby, BC V5G 4G3, Executive Director, AFFIRM THAT:

1. I am the Executive Director of VIP at Gateway Casinos & Entertainment Limited ("Gateway"). I started employment at Gateway on December 18, 2014 and have held this position since that time. My employment at Gateway was my first experience in the British Columbia gaming industry.
2. I had been living in Reno, Nevada since 1974. I worked in gaming in Nevada for 37 years. Between 1977 and 1996 I held positions at Harrah's Reno and Flamingo Reno casinos in their Asian marketing programs. In 1996 I joined El Dorado casino in Reno as Executive Director of Asian Marketing.
3. In 2015, I reported to Randy Sears at Gateway. In 2015 there was an Assistant Director of VIP that reported to me, named Thomas Chaio. I understand Mr. Chaio was employed at Gateway until about 2017.
4. My role as Executive Director of VIP is a business development role. I am responsible for attracting VIP players and developing Gateway's VIP program.
5. In early 2015, I knew that BCLC had the authority to ban players and that those players would not be permitted in the casino. I do not recall knowing what the process for banning a player was in 2015, as I was new to this system. I understood in 2015 that surveillance would identify banned players when they came into the casino.



6. Before I started at Gateway in December 2014, and for the entire time I have worked for Gateway, Gateway has considered developing a hotel on its property at Starlight Casino in New Westminster to expand its facility. I thought that the addition of an Asian-style spa within a hotel would be a benefit to our facilities at Starlight, as no other gaming facility had a high-end Asian-style spa such as the ones that I had seen in China and in my experience it could generate a lot of business.
7. My idea was that if we had VIP patrons who gambled at Starlight participate in the project, then we would have a base of customers to use the facilities that were developed. I looked at the business and thought there was a good potential that some of these patrons would have money to build or invest. I was authorized to talk to our VIP patrons or any other potential investor to see if there was interest by a patron or group of patrons to invest in a potential hotel and spa development, and generally spread the word to see if it generated any interest.
8. There was no formal offer, and I was never aware of any documents in relation to the project, and I did not develop any documents or provide any documents to anyone about this project. The purpose was just to talk about the idea and see if there was interest among our known patrons.
9. I asked the manager of VIP Business Development at the time, Maggie Chiu, if anyone had ever expressed interest in the idea of a hotel at Starlight. She arranged an appointment with a patron, Sun Kai Lu, who I understood was a regular player at Starlight. I believe she contacted him by phone, but I do not know. I did not have a relationship with any VIP player at the time that would allow me to call anyone directly about this type of conversation. I did not know Mr. Sun, as I had only just joined Gateway and had not yet met him.
10. On February 27, 2015, I met Mr. Sun in the parking lot of Starlight Casino. I do not recall now how I was made aware of the meeting, whether Ms. Chiu phoned me about it or just told me about it. I did not record the meeting in any agenda or daytimer because it was not really anything special in my mind, just a conversation.



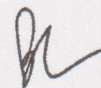
11. I was introduced to Mr. Sun in the parking lot. He was with a couple of other people, none of whom I knew personally.
12. I believe one of the other people in the group was a person named Wang Xi Hai. I had not met him before, but I understand he had played at Starlight before. I believe he played at Starlight after this meeting, but I do not think he was a regular player. I do not recall discussing the project with him, but he was present for part of the discussion with Mr. Sun.
13. The other person in the group I later learned was a man named Paul Jin. I did not know this man, however I remembered seeing him before. I had asked around about whether there were any other Asian-style spas in Vancouver, and I was told that there was one on No. 3 Road in Richmond, BC. It was described to me as "the best Asian spa in Vancouver". I do not remember who told me about it but I know I heard it from multiple patrons I spoke to. I stopped by there to check it out. I do not recall when, but it was sometime in late January 2015 or early February 2015. I saw this man there, and I recall he introduced himself to me as Jia Xiao Bao or something like that (I am guessing on English spelling). He did not use the name Paul Jin, but if he had, it would not have meant anything to me anyway. I did not know him and I had never seen him in connection with the casino. I briefly looked around the spa, but I quickly concluded that it was not the type of facility that I was thinking about for Starlight, as it did not strike me as a high-end spa of the type that are associated with casinos in China. I am certain that I did not discuss the project with Mr. Jin/Mr. Jia or anyone else at the spa. I recall that the spa was called the Water Cube. I did not go there again.
14. I did not get the impression that Ms. Chiu knew who Mr. Jin was on February 27, 2015. We did not discuss the others who were with Mr. Sun because the purpose was to meet with Mr. Sun.
15. We walked down the sidewalk along the parking lot so I could show Mr. Sun where the proposed project would be on the Starlight property.
16. I have recently reviewed the surveillance video of this meeting. I see from my review of the video that after walking along the sidewalk, Ms. Chiu spoke with Mr. Sun for a time

while I appear to be chatting with the two other men, who I now know to be Mr. Wang and Mr. Jin. I am unable to recall anything about my conversation with these two other men. I do remember clearly that the purpose of the meeting was to discuss the opportunity with Mr. Sun. I think it is likely that Ms. Chiu had the initial conversation with Mr. Sun about the opportunity because the two of them knew each other already, while he and I were strangers.

17. After Ms. Chiu's conversation with Mr. Sun, the three of us walked away from the other two men, and towards the casino. I recall telling Mr. Sun about the idea of a hotel near or connected to the casino, and the addition of an Asian-style spa. I explained that this was something Gateway was looking at building. I do not recall any other specifics of the conversation, except that Mr. Sun said something like it "seemed workable". He did not talk very much. We went inside the casino to look at the property from the smoking balcony as well. To my recollection the conversation lasted about 10 minutes.
18. I recall that I saw David Tseng in the parking lot. He said "Bill, don't you remember me?" and I stopped to talk to him for a bit. I knew Mr. Tseng as a player in Reno about 10-15 years before. I recall chatting with him for a bit. I do not remember what we talked about.
19. I had some contact with Mr. Sun after the February 27, 2015 meeting. I specifically recall attending a dinner he hosted in Richmond at one point, and I bought him dinner a couple of times at Starlight, probably in 2016. We never talked about the project in any detail again after February 27, 2015, and I did not believe that he was interested in talking about it because he did not bring it up again, and neither did I. I do not recall seeing Mr. Sun after 2017.
20. I did not know who Paul Jin was in 2015. The first time I recall hearing the name Paul Jin was when a BCLC investigator asked to speak to me about the February 27, 2015 meeting. He asked me something like "how do you know Paul Jin?" I replied that I did not know any Paul Jin. The investigator told me I had met with him on February 27, 2015, and that he was a banned player. I told him that I did not know any Paul Jin and had not met with Paul Jin to my knowledge. He asked me who was at the meeting and I told him that this other person had said his name was Jia. I told him I had no knowledge that this person was

banned by BCLC, and I did not know him. I also told the BCLC investigator that the purpose of the meeting was to discuss an investment related to VIP business development with Mr. Sun. I am confident that I would not have told him that the purpose of the meeting was to meet with Mr. Wang, as I did not know Mr. Wang at the time. I do not recall if I told the investigator specifically what the project was, but I believe I told him that it was in relation to the parking lot where the hotel would be constructed.

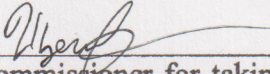
21. I recall telling the BCLC investigator to come talk to me if he had any further questions. I do not recall what else we discussed. I was never contacted again about this incident until October 2020.
22. I did not know that Paul Jin had been banned by BCLC in 2015. I had never seen him at Starlight Casino before this incident in February 2015, and I do not believe I ever saw him again at the Starlight, or any place else after February 2015. I never contacted him. I never discussed him with anyone at Gateway before February 27, 2015, and no one at Gateway told me to contact Mr. Jin.
23. I am confident that no one at Gateway told me or would have told me to contact a player that was banned by BCLC to discuss this project, and I would not have done so.
24. I recall at least six other times when I met with other patrons to have a similar conversation about the proposed hotel and spa development, and show the patron the parking lot area where a proposed development would be located. I believe Maggie Chiu would have been with me for these meetings. I do not recall these interactions in detail, except:
 - (a) In 2016 or 2017 I spoke to a patron about the project who had a connection to a developer. I believe I met with this developer and I provided him with or directed him to excerpts of the New Westminster building code, which would apply to construction of any building at the site; and
 - (b) In 2016 or 2017 I had a number of meetings with a person who owns hotels in Alberta. This person was interested in pursuing the development so I connected him with our development team. I know there was some discussion about the project



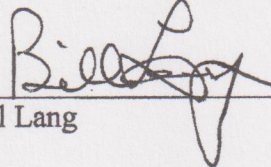
between Gateway's development team and the interested party, but I was not involved in those discussions in any capacity.

25. I never reached an agreement with any person to invest in a hotel and/or spa project at Starlight. I did not have the authority to do so. Gateway has an internal development team that would be responsible for working out a development agreement.
26. At the time of swearing this Affidavit, I was not physically present before the undersigned commissioner but was linked with him through video-conferencing. In swearing this Affidavit, I complied with and utilized the process outlined in the British Columbia Supreme Court *Notice to the Profession re Affidavits for use in Civil and Family Proceedings* dated March 20, 2020.

AFFIRMED BEFORE ME at via video)
teleconference with the declarant in)
Richmond, British Columbia and the)
Commissioner in Vancouver, British)
Columbia, on this 15th day of January,)
2021.)


A Commissioner for taking affidavits for)
British Columbia)

OLEG SHCHEGLOV
A Commissioner for Taking Affidavits
for the Province of British Columbia
Articled Student, Expires June 30, 2021


Bill Lang



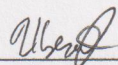
AFFIDAVIT OF BILL LANG SWORN JANUARY 15, 2021

Certificate of Commissioning by Videoconference

I, Oleg Shcheglov, Commissioner of Taking Affidavits in and for the Province of British Columbia, DO HEREBY CERTIFY that:

1. I took the affidavit of Bill Lang via videoconference on January 15, 2021 (the "Affidavit").
2. The deponent and I followed the process outlined in the British Columbia Supreme Court *Notice to the Profession, the Public and the Media Re Affidavits for use in Civil and Family Proceedings* dated March 20, 2020 and the process outlined by the Alberta Court of Queen's Bench in *Notice to the Profession and Public #2020-02* dated March 25, 2020. In addition to the steps described in the Affidavit, I reviewed the government-issued photo ID of the deponent and took screenshots of both back and front of the ID. I reviewed each page of the Affidavit with the deponent and observed the deponent signing the affidavit. After receiving the electronic version of the deponent's Affidavit, I compared each page of the copy I received from the deponent with the initialed copy that was before me while I was linked by videoconference with the deponent. Upon being satisfied the two copies were identical, I fixed my name to the jurat of my copy of the Affidavit; and
3. I am satisfied that this process was necessary because it was unsafe for medical reasons for the deponent and me to be physically present together.

DATED at Vancouver, British Columbia, this 15th day of January, 2021.



A Commissioner for Taking Affidavits
in and for the Province of British Columbia

OLEG SHCHEGLOV

Print Name and Expiry

OLEG SHCHEGLOV

A Commissioner for Taking Affidavits
for the Province of British Columbia
Articled Student, Expires June 30, 2021

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The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Bill Lang, with a business address of 4400 Dominion St #100, Burnaby, BC V5G 4G3, Executive Director, AFFIRM THAT:

1. I am the Executive Director of VIP at Gateway Casinos & Entertainment Limited ("Gateway"). I started employment at Gateway on December 18, 2014 and have held this position since that time. My employment at Gateway was my first experience in the British Columbia gaming industry.
2. I had been living in Reno, Nevada since 1974. I worked in gaming in Nevada for 37 years. Between 1977 and 1996 I held positions at Harrah's Reno and Flamingo Reno casinos in their Asian marketing programs. In 1996 I joined El Dorado casino in Reno as Executive Director of Asian Marketing.
3. In 2015, I reported to Randy Sears at Gateway. In 2015 there was an Assistant Director of VIP that reported to me, named Thomas Chaio. I understand Mr. Chaio was employed at Gateway until about 2017.
4. My role as Executive Director of VIP is a business development role. I am responsible for attracting VIP players and developing Gateway's VIP program.
5. In early 2015, I knew that BCLC had the authority to ban players and that those players would not be permitted in the casino. I do not recall knowing what the process for banning a player was in 2015, as I was new to this system. I understood in 2015 that surveillance would identify banned players when they came into the casino.



6. Before I started at Gateway in December 2014, and for the entire time I have worked for Gateway, Gateway has considered developing a hotel on its property at Starlight Casino in New Westminster to expand its facility. I thought that the addition of an Asian-style spa within a hotel would be a benefit to our facilities at Starlight, as no other gaming facility had a high-end Asian-style spa such as the ones that I had seen in China and in my experience it could generate a lot of business.
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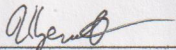
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A Commissioner for taking affidavits for)
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Bill Lang

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