

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

**The Honourable Mr. Austin F. Cullen, Commissioner**

**AFFIDAVIT**

I, Kevin deBruyckere, of 2940 Virtual Way, Vancouver, BC, Director, AML & Investigations at British Columbia Lottery Corporation ("BCLC"), SWEAR THAT:

1. I am the Director, AML (Anti-Money Laundering) & Investigations in the Legal, Compliance, Security division at BCLC, a participant in this public inquiry and, as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where such facts and matters are stated to be made upon information and belief, and as to such facts and matters I verily believe them to be true.

2. I swear this affidavit to provide evidence to the Commission pursuant to a summons issued to me pursuant to the *Public Inquiry Act*, SBC 2007, c 9. I swear this affidavit further to my Affidavit #2 sworn October 23, 2020, in particular with respect to BCLC's AML program.

**ACAMS Training and Certification**

3. BCLC's employees in the AML Unit, Investigators and Operational Gaming Compliance Officers take an examination through the Association of Certified Anti-Money Laundering Specialists (ACAMS) and are designated, through that same organization, as Certified Anti-Money Laundering Specialists (CAMS). BCLC also facilitates the examination and certification of GPEB employees through the BCLC ACAMS Enterprise account (discussed in the next paragraph). Attached as **Exhibit 1** is a tracking spreadsheet that contains the names of current BCLC and GPEB employees who are ACAMS members and records their current CAMS certification status. The names of GPEB employees have been redacted, and other personal information in the spreadsheet has been removed.

4. By way of background, ACAMS describes itself as the largest international membership organization for Anti-Financial Crime professionals. In addition to certification, ACAMS produces e-learning tools, webinars, and publications. BCLC has an ACAMS Enterprise membership which provides BCLC over a number of individual membership accounts – these accounts are in turn used to access these ACAMS resources. BCLC shares some of these accounts with GPEB, a practice that had already been in place when I arrived at BCLC and continues to this day.

5. Attached as **Exhibit 2** is the Certification Candidate Handbook for the CAMS examination, which includes the eligibility requirements, a description of the form of examination, the subject matter domains and a list of the objectives in each of them.

#### **Counter Illicit Finance Alliance of British Columbia**

6. In mid-December 2020, the RCMP announced the formation of the Counter Illicit Finance Alliance of British Columbia (CIFA-BC), the first permanent Public-Private Partnership of its kind in Canada, to combat money laundering in British Columbia. It is a collaboration between public and private industry to lawfully share information in the interest of protecting the economic integrity of British Columbia through prevention, detection and disruption of illicit financial activity. Day-to-day operations of CIFA-BC are managed by the BC RCMP. The partner structure includes core and ad-hoc partners: BCLC was invited and accepted an invitation to participate as a core or “Principal Partner” in this initiative.

7. The group held its first meeting on November 25, 2020, which I attended on behalf of BCLC. CIFA-BC is currently finalizing a Partner Protocol that will establish the framework for cooperation, expectations and accountability for Partners within CIFA-BC.

8. CIFA-BC succeeds a previous initiative started in 2018 by the Combined Forces Special Enforcement Unit of British Columbia (CFSEU-BC) to engage with public and private stakeholders to address money laundering impacting BC casinos, known as Project Athena. CIFA-BC introduces a more formalized and clearly defined governance and operating structure and financial information sharing protocol, as well as an expanded mandate.

**100% Known Play**

9. As part of the current plan to reopen casinos safely during the COVID-19 pandemic (a decision about re-opening is pending), BCLC will make it mandatory for players to swipe their Encore Rewards card, or some form of casino issued identification, upon entry and before playing to provide contact tracing capability throughout Casino and Community Gaming properties.

10. While those requirements are part of a public health measure response, there have been ongoing, active discussions at BCLC about potentially adopting this type of requirement on a permanent basis as part of BCLC's AML effort, in particular as part of a suite of reforms that would work towards the goal of establishing 100% known play. 100% known play refers to the objective of eliminating anonymous play and allowing BCLC to track every player transaction that takes place in its casinos. BCLC is of the view that working towards 100% known play will help prevent money laundering in its casinos and enhance player health.

11. Such a measure would also assist BCLC to meet the new FINTRAC requirements, discussed in my previous affidavit, requiring identification and a "receipt of funds" record for single transactions of \$3,000 or more.

12. Further with respect to customer identification efforts, on November 10, 2020, BCLC put out a request for information for a Customer Identity and Access Management (CIAM) solution. BCLC envisages a CIAM solution that will manage player access and allow players, through a single player account and identity, to engage with all of the products and services set out above. Such a software solution would allow BCLC to enhance the player experience, as well as provide BCLC with valuable insight through analytics which could in turn be used to further BCLC's AML efforts.

13. Taking it one step further, and this is a longer term measure under discussion, is the idea of "Account Based Gaming", which would not only require use of a card before play, but would link it to an individual's centralized gaming account into which a player must deposit funds in order to play. Casino play would become completely cashless, and managed through some form

of a digital wallet or player card. Anonymous play at slots and tables would be completely eliminated.

14. These measures, paired with the future AML software that I referred to in my previous affidavit, would allow BCLC to record every transaction, even those below the \$3,000 threshold, providing better tracking across land-based casinos and PlayNow. The enhanced analytics could also improve the responsible gaming program by potentially allowing for the earlier identification of problematic play and making it much more difficult for self-excluded patrons to gain access to BCLC facilities and products.

15. These initiatives are still being considered and discussed internally at BCLC, and need to be subject to a full risk assessment before they are operationalized. BCLC also must engage Service Providers and the Gaming Policy and Enforcement Branch for their perspectives and input.

#### **BCLC AML Program Supplementary Information**

16. I add the following clarification and additional context to my evidence in my previous affidavit, regarding some of the components of the BCLC AML Program:

- (a) **Cash Conditions/Restrictions:** while it is accurate that in April 2015, BCLC formally developed and implemented the *Sourced Cash Conditions* program, I note that based on my review of BCLC records, it was in November 2014 that BCLC put its first player on a form of sourced cash conditions: all lower mainland casinos were advised not to accept cash from this player and he was banned from all cash play until interviewed by BCLC investigators;
- (b) **Convenience Cheque / Verified Win Cheque Review Process:** Dr. Peter German's 2018 gaming industry report describes BCLC's practice of marking cheques as "verified win" or "return of funds - not gaming winnings" as of "limited value". I disagree. Based upon my experience in the banking industry, any notation on the cheque instrument is welcome and often effective: AML investigators at the banks will review and consider that information, in addition to any other indications of suspicious activity, to assist in their adjudication of a

potentially suspicious transaction. The representatives of the banks are aware of BCLC's practice in respect of convenience cheques: attached as **Exhibit 3** is a Project Athena presentation deck dated February 6, 2020, that discusses, among other things, BCLC's practice in respect of cheques. I have redacted some identifying information about the banks referred to in this presentation.

(c) **High Risk Patron Enhanced Due Diligence Process:** less than a week after my last affidavit, BCLC set up additional automated alerts for identifying high risk patrons that will be subject to the enhanced measures described in my previous affidavit. This is an example of the ongoing enhancements to our AML controls. High risk patrons are now flagged in the following additional circumstances:

- (i) Any eGaming player with a monthly deposit total equal or greater than \$100,000 is identified on an automated monthly report;
- (ii) Any player with two or more suspicious transaction reports, who is not labeled in iTrak as a high risk patron, is identified on an automated monthly report;
- (iii) Any player marked as high risk patron in eGaming and matched through our data management software as having an iTrak profile not labelled as a high risk patron is identified on an automated monthly report;
- (iv) Any player marked as a high risk patron in iTrak and matched through our data management software as having an OpenBet (BCLC's online sports betting software) profile and not labelled as a high risk patron is identified on an automated monthly report; and
- (v) Any players meeting the criteria for being manually added as a high risk patron in iTrak will now be marked as such by investigators in OpenBet and vice-versa.

### **Daily AML Alerts**

17. In addition to the components of the AML program that I listed in my previous affidavit, BCLC has a number of controls in place to detect anomalous behaviour and transactions, including system generated alerts that are automatically generated, and received by AML investigators, every morning. It is my normal practice to review each of these reports every day:

- (a) **Daily FINTRAC Report Summary** – this report notifies BCLC of any errors in submissions to FINTRAC;
- (b) **Bank Draft/Certified Cheque Report** – this is a rolling spreadsheet containing data of all bank drafts and certified cheques negotiated by the Service Providers;
- (c) **Large Cash Transactions Rolling Report** – this is a rolling six day spreadsheet with data on Large Cash Transactions received by Service Providers;
- (d) **Disbursements, Non-matching Reasons and Methods** – this report provides notifications of potential errors in the completion of Large Cash Transactions Reports for review and correction; and
- (e) **Convenience Cheque Report** – this is a rolling 30 day spreadsheet containing data associated to cheques issued to players by Service Providers and the reason for the cheque, for example, return of funds from a PGF account.

### **General Observations**

18. I set out below my personal observations about BCLC's AML program from the start of my tenure there in April 2019 to date, and about some of the recommendations made in Dr. Peter German's 2018 gaming industry report.

19. On my arrival at BCLC, I was impressed with BCLC's team and the AML controls that were in place. Since I have been at BCLC, there was and continues to be a strong relationship with GPEB and law enforcement. With respect to GPEB in particular, I attribute the strong relationship not just to the individuals currently in their respective roles at each organization, but to an acceptance of each organization's responsibilities under the applicable legislation.

20. In my personal opinion, informed in part by my prior experience as the Canadian Head of AML Investigations for HSBC Bank Canada and 29 years as a member of the RCMP, BCLC has a best in class AML control framework.

21. I started at BCLC approximately one year after Dr. German's gaming report was published. I immediately observed that some of the recommendations made in Dr. German's report were problematic, and may in fact run counter to BCLC's efforts to prevent money laundering. I came to the conclusion, after making enquiries with staff, that some of the problematic recommendations were likely the product of either insufficient dialogue between BCLC and Dr. German, or an oversight on Dr. German's part in terms of considering some of the information provided by BCLC.

22. In particular, I question Dr. German's recommendations with respect to FINTRAC.

23. First, recommendations 5-7 state that:

- (a) Service Providers should be responsible for completing all necessary reports to FINTRAC, including suspicious transaction reports;
- (b) discussions with FINTRAC should take place with the purpose of designating Service Providers as direct reports to FINTRAC, and in the alternative, BCLC should submit the Service Provider reports unaltered to FINTRAC; and
- (c) BCLC file "Corporate STRs".

24. These recommendations ignore the reality that BCLC is a FINTRAC reporting entity and ultimately accountable for compliance with the *PCMLTFA*, by virtue of being the entity responsible for the conduct and management of gaming under the *Gaming Control Act*. Furthermore, the recommendations do not recognize that BCLC's intelligence analysts enhance the quality of suspicious transaction reports initiated by the unusual financial transaction alerts submitted by Service Provider staff. Finally, there is no such thing as a "Corporate STR", nor is there any suggestion as to what such a report would look like.

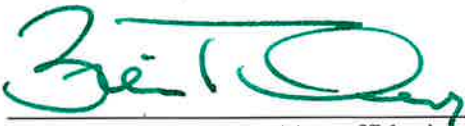
25. With regard to recommendation #9, that the Service Providers copy FINTRAC suspicious transaction reports to BCLC, the regulator, the designated police unit, and the RCMP, I note that

this was BCLC's practice long before my arrival, and BCLC is the only reporting entity that I am aware of that provides every suspicious transaction report to the police.

26. Recommendation #10 refers to the provision of iTrak terminals to GPEB and the designated policing unit. BCLC installed terminals providing access in GPEB offices and with the RCMP "E" Division Headquarters for use by GPEB investigators assigned to the Joint Illegal Gaming Investigation Team (JIGIT). To my knowledge BCLC is the only regulated entity that provides access to its own regulator in this way; it puts BCLC in the awkward position of having to monitor its own regulator's use of the data to ensure that BCLC's information, including personal information, has been used properly.

27. Recommendation 22 refers to the elimination of Player Gaming Funds (PGF) once responsibility for cash alternatives has been transitioned to the Service Providers. I consider PGF accounts to be a valuable tool currently available for AML as well as public safety, by reducing usage of cash, and I strongly disagree with this recommendation.

SWORN BEFORE ME at Vancouver,  
British Columbia, on January 19, 2021



A commissioner for taking affidavits for  
British Columbia



KEVIN deBRUYCKERE

**BRIAN T. DUONG**  
*Barrister & Solicitor*  
**Hunter Litigation Chambers**  
**Suite 2100 - 1040 West Georgia Street**  
**Vancouver, BC V6E 4H1**  
**Telephone: 604-687-8881**

THIS IS **EXHIBIT "1"** TO THE  
AFFIDAVIT OF **KEVIN DEBRUYCKERE**  
SWORN BEFORE ME AT VANCOUVER,  
BC ON THE 19th DAY OF JANUARY, 2021.

A handwritten signature in green ink, appearing to read "Kevin DeBruyckere", written over a horizontal line.

A Commissioner/Notary Public for the  
Province of British Columbia.

Member Number	First Name	Last Name	Membership Expiration Date	CAMS Exam Status	CAMS Recertification Deadline	Company Name	Title
1000207069	Bel	Bamra	June 30, 2021	Passed CAMS exam on June 22, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Manager AML Intelligence
1000333690	Jennifer	Barbosa	June 30, 2021	Passed CAMS exam on November 29, 2018	December 31, 2021	BCLC	Senior Risk Manager
1000256818			June 30, 2021	CAMS exam not yet ordered	Not Applicable	GPFB	Auditor
1000174587	Steven	Beekma	June 30, 2021	Passed CAMS exam on March 31, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Casino Security Investigator
1000174565	Willem	Boyd	June 30, 2021	Passed CAMS exam on March 30, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Assistant Manager, Operational Gaming Compliance
1000468703	Amy	Brathwaite	June 30, 2021	CAMS exam not yet ordered	Not Applicable	British Columbia Lottery Corporation	Investigator
1000178211	Christopher	Brown	June 30, 2021	Passed CAMS exam on August 8, 2014. Recertified in 2020	December 31, 2023	British Columbia Lottery Corporation	Gaming Compliance Officer
1000241095	Brandy	Chen	June 30, 2021	Passed CAMS exam on March 18, 2014. Recertified in 2020	December 31, 2023	British Columbia Lottery Corporation	Investigations Coordinator
1000174628	Lynn	Cousins	June 30, 2021	Passed CAMS exam on June 4, 2014. Recertified in 2020	December 31, 2023	British Columbia Lottery Corporation	Lottery Investigator-Corporate Security
1000174575	Caterina	Cupietta	June 30, 2021	Passed CAMS exam on February 22, 2017. Recertified in 2020	December 31, 2023	British Columbia Lottery Corporation	AML Intelligence Analyst
1000475155	Kevin	deBruyckere	June 30, 2021	Passed CAMS exam on February 28th, 2017	December 31, 2021	British Columbia Lottery Corporation	Director of AML & Investigations
864865	Brad	Desmarais	June 30, 2021	CAMS exam not yet ordered	Not Applicable	British Columbia Lottery Corporation	Vice President
1000241092	Mark	Dickerson	June 30, 2021	CAMS exam not yet ordered	Not Applicable	British Columbia Lottery Corporation	Investigator
1000174574	Cameron	Dodson	June 30, 2021	Passed CAMS exam on March 20, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Investigator
1000231683			June 30, 2021	CAMS exam not yet ordered	Not Applicable	GPFB	Director Dominion
1000175594	Kris	Gade	June 30, 2021	Passed CAMS exam on March 30, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Manager, Investigations
1000174572	Bruno	Gatto	June 30, 2021	Passed CAMS exam on March 27, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Assistant Manager, Investigations
1000183171	Amv	Guillemin	June 30, 2021	Passed CAMS exam on April 1, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Lottery Compliance Specialist
1000466315			June 30, 2021	Passed CAMS exam on September 3, 2019	December 31, 2022	Gaming Policy and Enforcement Branch	Acting / Director
1000236532	Jenny	Lam	June 30, 2021	Passed CAMS exam on August 26, 2016. Recertified in 2019	December 31, 2022	British Columbia Lottery Corporation	AML Investigator
1000375758	Gerald	Lau	June 30, 2021	Passed CAMS exam on September 9, 2020	December 31, 2023	British Columbia Lottery Corporation	Investigator
845594	Stone	Lee	June 30, 2021	Passed CAMS exam on March 22, 2017. 2020 recertification paid - pending application	December 31, 2020	British Columbia Lottery Corporation	Casino Security Investigator
1000241093	Gram	Lonetley	June 30, 2021	Passed CAMS exam on August 4, 2020	December 31, 2023	British Columbia Lottery Corporation	Investigator
1000231667			June 30, 2021	CAMS exam not yet ordered	Not Applicable	GPFB	Manager Audit
1000241091	Craig	Morphet	June 30, 2021	Passed CAMS exam on November 14, 2018	December 31, 2021	British Columbia Lottery Corporation	Investigator
1000177010	Jeffrey	Mullan	June 30, 2021	Passed CAMS exam on October 28, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Interim Assistant Manager
1000538027			June 30, 2021	CAMS exam Authorization Code valid until February 28, 2021	Not Applicable	GPFB	Gambling Auditor
1000203879	Brandon	Norgaard	June 30, 2021	Passed CAMS exam on May 12, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Investigator
1000174621	Courtney	Robinson	June 30, 2021	Passed CAMS exam on February 26, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Investigations Specialist
1000174571	Bradley	Rudnicki	June 30, 2021	Passed CAMS exam on April 2, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	AML Intelligence Specialist
1000472438	Paul	Sandra	June 30, 2021	CAMS exam not yet ordered	Not Applicable	British Columbia Lottery Corporation	Investigator
1000587803	Marie-Noelle	Savore	June 30, 2021	CAMS exam scheduled for February 12, 2021	Not Applicable	British Columbia Lottery Corporation	CCO & Vice President Legal, Compliance, Security
864852	David	Slobodian	June 30, 2021	Passed CAMS exam on January 23, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Corporate Security Specialist
1000174630	Paul	Stanney	June 30, 2021	Passed CAMS exam on May 30, 2014. Recertified in 2020	December 31, 2023	British Columbia Lottery Corporation	eGaming Investigator
1000174637	Robert	Stratford	June 30, 2021	Passed CAMS exam on March 31, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	eGaming Investigator
1000174584	Kevin	Sweeney	June 30, 2021	CAMS exam order paid and approved. Incomplete exam application submitted	Not Applicable	British Columbia Lottery Corporation	Director, Compliance & Investigations
1000174576	Daryl	Tottenham	June 30, 2021	Passed CAMS exam on January 22, 2015. Recertified in 2018	December 31, 2021	British Columbia Lottery Corporation	Manager, AML Programs
1000174580	Rick	Tsone	June 30, 2021	Passed CAMS exam on May 12, 2016. Recertified in 2019	December 31, 2022	British Columbia Lottery Corporation	Compliance Officer
1000215168			June 30, 2021	CAMS exam not yet ordered	Not Applicable	GPFB	Director Gaming Investigations Island Region

THIS IS **EXHIBIT "2"** TO THE  
AFFIDAVIT OF **KEVIN DEBRUYCKERE**  
SWORN BEFORE ME AT VANCOUVER,  
BC ON THE 19th DAY OF JANUARY, 2021.

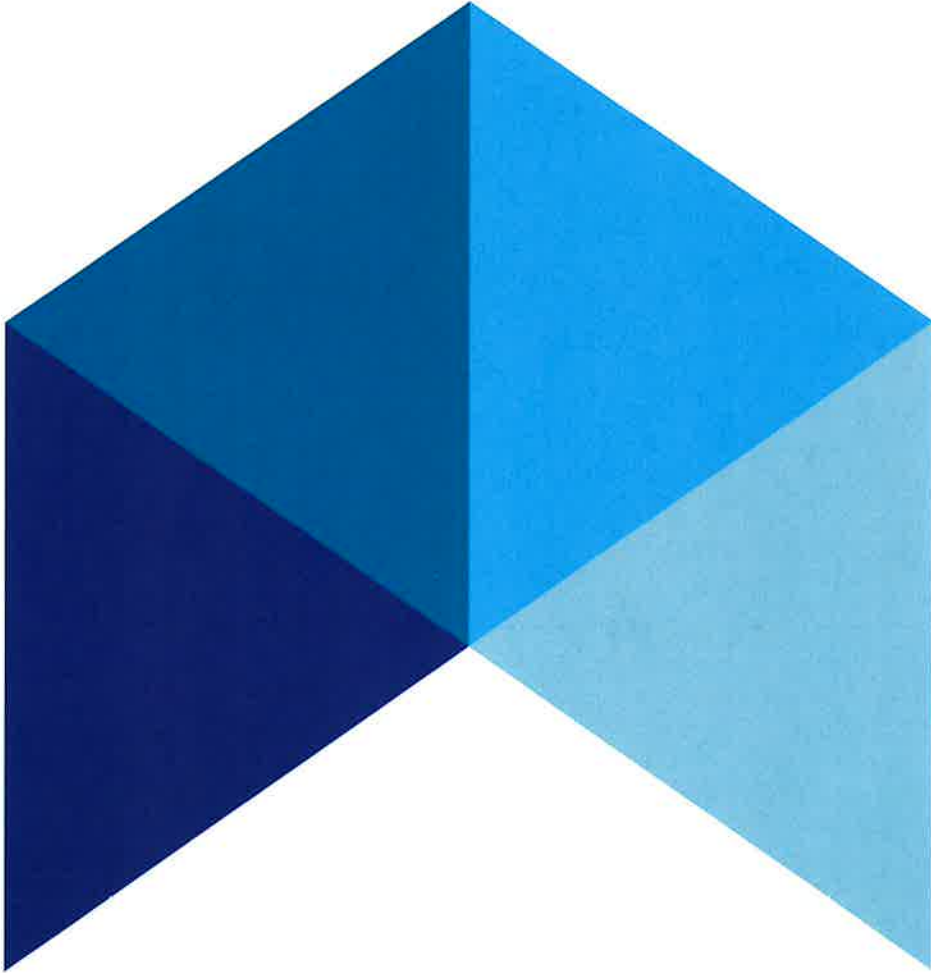
A handwritten signature in green ink, appearing to read "Kevin DeBruyckere", written over a horizontal line.

A Commissioner/Notary Public for the  
Province of British Columbia.

CERTIFICATION

# Candidate Handbook

For the CAMS Examination



[acams.org](http://acams.org)

**ACAMS**

# Why Earn CAMS?



The Certified Anti-Money Laundering Specialist (CAMS) designation denotes a superior level of understanding of international AML/CFT principles. Passing the CAMS examination distinguishes you as an AML/CFT authority and helps mitigate institutional financial crime risks. Internationally renowned and accepted, world governments acknowledge the CAMS Certification as the gold standard in AML/CFT compliance. Those who earn the CAMS designation reap multiple benefits, as increasing their professional value through better understanding of financial crime detection and prevention techniques, protecting their institution from money laundering threats and minimize financial crime risks, meeting mandated AML training requirements through preparation and study, and proving their AML expertise to examiners and regulators.

## The CAMS credential:

- Demonstrates to examiners that your institution has specialized knowledge in the AML field. CAMS is recognized as the benchmark of AML certifications by regulatory agencies and the financial services industry.
- Can help your organization minimize risk. Having a CAMS-certified team ensures that your colleagues share and maintain a common level of AML knowledge. Studying for the examination also offers guidance in designing and implementing tailored AML programs.
- Upgrades your staff's skills. The exam preparation and continuing education required to maintain certification ensures your employees' skills remain sharp and their knowledge current. Having a CAMS-certified team lends tremendous credibility to your AML program, thereby enhancing your commitment and diligence in the eyes of regulators.



## CAMS Preparation and Support

The CAMS examination requires thorough preparation. But, we're with you every step of the way. Our certification program equips you with everything you need to properly prepare for the exam.

### CAMS Study Guide

The CAMS Study guide is your main reference material and content source for preparing for the rigors of the CAMS examination.

### CAMS eLearning Course

The interactive online course is a self-paced learning option. The online training course allows you to:

- Participate at your leisure. Log in and listen to the course in sections and go back and review as needed.
- Log in from your office or home. You don't need to worry about travel time or travel-related expenses.
- Review as often as needed. Log in as many times as you need before your exam to refresh and review.

### CAMS Virtual Classroom

Candidates who need extra guidance and study structure may choose to enroll in the CAMS Virtual Classroom. The CAMS Virtual Class provides a structured learning environment to candidates by dividing the study materials into six, 2-hour classes that meet once a week with an expert instructor by way of a live web-based interactive classroom. The CAMS Virtual Classroom option sets candidates up for success through weekly homework assignments and required readings.

Visit [www.acams.org](http://www.acams.org) to find out when the next class is in session.

# About CAMS Certification

## About this Handbook

This handbook provides information that you will need to register for the CAMS examination including eligibility requirements, policies, an exam blueprint and application. It also includes the CAMS recertification policies so that you can keep your CAMS certification active and up to date.

## CAMS Eligibility Requirements and ACAMS Membership

Candidates wishing to sit for the CAMS examination must have:

- **Active ACAMS membership**
- **40 credits required**
- **Education**
  - 10 for Associates
  - 20 for Bachelors
  - 30 for Masters
  - 40 for JD or PhD
- **Work Experience**
  - 10 credits for each year of experience
  - Unlimited
- **Training**
  - 1 credit for each hour of financial-crime related training
  - Unlimited

To check if you meet the eligibility requirements, go to: [Eligibility Calculator](#)

Candidates who pass the CAMS examination and wish to use and display the CAMS credential must have an active ACAMS membership.

## Examination Fee

### CAMS PACKAGE WITH VIRTUAL CLASSROOM:

PRIVATE SECTOR US\$2180

PUBLIC SECTOR\* US\$1790

### STANDARD CAMS PACKAGE WITH VIRTUAL CLASSROOM:

PRIVATE SECTOR US\$1695

PUBLIC SECTOR\* US\$1295

\*For individuals who work for the government.

## How to Get Started

### STEP 1:

Fill out your [application](#) online.

### STEP 2:

Choose your membership and CAMS certification package.

### STEP 3:

Submit your payment, application and supporting documents.

### STEP 4:

Upon payment, we will provide you with access to the ACAMS LMS where you will find all your preparation material along with the CAMS eLearning course.

# About CAMS Certification

## How to Apply

Complete your online application and submit payment.

Payment may be made by credit card, personal check, cashier's check, money order or wire transfer (wire transfers must include identifying information). Checks should be made payable to ACAMS. Prices are subject to change. Declined credit cards and/or returned checks are subject to a US\$25 penalty.

### ACAMS

PO Box 74007578  
Chicago, IL 60674-7578

Please submit your questions via our [Contact Us](#) page online.

## Background Verification Check

ACAMS reserves the right to conduct a background check, including a criminal records check, on all people wishing to take the CAMS examination. Candidates may be required to fill out a Background Verification Authorization Form.

Candidates will receive correspondence from ACAMS regarding the status of their application in the event ACAMS performs a background check.

Please be advised that for the integrity of our association and its mission, in the event an individual is subject to a background check and does not pass, that individual will not be allowed to take the CAMS examination.

## Statement of Nondiscrimination

ACAMS does not discriminate among candidates based on age, gender, race, color, religion, national origin, disability or marital status.

## Disability Services

ACAMS is committed to providing reasonable accommodations for individuals with documented disabilities as defined by local or applicable law. Our intent is to ensure that everyone who makes a request for accommodations is advised of the accommodation process as promptly as possible. If you have a disability as defined under local or applicable law, please contact our Accommodations Coordinator for a request form and information regarding our accommodation process.

## Process

1. Contact Disability Services Accommodation Coordinator:  
E-mail: [accommodations@acams.org](mailto:accommodations@acams.org)  
Phone: 1.786.456.4705  
Fax: 1.866.494.0040
2. The Accommodations Coordinator will provide you an application. Complete the accommodation request form specifying your impairment and the requested accommodation. In addition to the form, you must provide recent (generally no more than five years old) certification and/or documentation from a qualified medical or educational professional that (a) provides a specific diagnosis; and (b) recommends specific accommodations that might be helpful to the applicable setting and request based on the diagnosis.
3. Your request with supporting documentation will be evaluated as appropriate to determine whether your request can reasonably be granted. If granted, we will coordinate to implement the request. If the request is denied or deemed unreasonable by ACAMS, we will explore any alternative reasonable accommodations options, if appropriate.

Requests are reviewed on an individual and rolling basis. Please note, the time for approval could potentially affect the timeframe for testing with approved accommodation/s. If you believe you have been discriminated against due to a disability you should contact: [accommodations-management@acams.org](mailto:accommodations-management@acams.org) to address the immediate situation.

# CAMS Examination

## Taking the CAMS Examination

The CAMS examination consists of 120 multiple choice and multiple selection questions. The passing score required to obtain the CAMS certification is 75.

All candidates have 3.5 hours to complete the exam. There is no penalty for guessing. Avoid leaving any questions unanswered to maximize your chances of passing. For practice questions, please see Chapter 6 of the Study Guide.

Disclaimer: The practice questions contained in the study guide are not meant to indicate the exact style or difficulty level of the actual CAMS examination questions. They are designed to help candidates review the content of the study guide.

## CAMS Examination Blueprint

The CAMS examination consists of four domains. Below you will find the test objectives for each of the domains as well as the overall percentage weight of each domain.

## I. RISKS AND METHODS OF MONEY LAUNDERING AND TERRORISM FINANCING 26%

- |      |   |      |  |
|------|---|------|--|
| 1.1  | Identify the risks to individuals for violations of AML laws.   | 1.12 | Identify methods to launder money used in bureaux de change and money services businesses.   |
| 1.2  | Identify the risks to institutions for violations of AML laws.  | 1.13 | Identify methods to launder money used by lawyers, notaries, accountants, and auditors.  |
| 1.3  | Identify economic and social consequences of money laundering.  | 1.14 | Given a scenario about trust and company service providers, identify the red flags that indicate laundering or financing terrorism.  |
| 1.4  | Identify the purpose of sanctions being imposed (e.g., OFAC, UN, EU).   | 1.15 | Given a scenario about emerging risks associated with technology as an enabler of money laundering or financing terrorism, identify the red flags.   |
| 1.5  | Identify methods to finance terrorism.  | 1.16 | Given a scenario about banks and other deposit taking institutions, identify the red flags that indicate money laundering or financing terrorism.  |
| 1.6  | Identify methods to launder money used in banks and other deposit taking institutions.  | 1.17 | Given a scenario about insurance companies, identify the red flags that indicate money laundering or financing terrorism.  |
| 1.7  | Identify methods to launder money used in insurance companies.  | 1.18 | Given a scenario about broker-dealers, investment advisors, and the capital markets (e.g., securities, futures), identify the red flags that indicate money laundering or financing terrorism. |
| 1.8  | Identify methods to launder money using broker-dealers, investment advisors, and the capital markets (e.g., securities, futures). |      |  |
| 1.9  | Identify methods to launder money used in gaming (e.g., casinos).   |      |  |
| 1.10 | Identify methods to launder money used in dealers of precious metal or high-value items.  |      |  |
| 1.11 | Identify methods to launder money used in real estate.  |      |  |

## CAMS Examination *continued*

### I. RISKS AND METHODS OF MONEY LAUNDERING AND TERRORISM FINANCING 26% *continued*

- |  |  |
|--|--|
| <p>1.19 Given a scenario about gaming (e.g., casinos), identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.20. Given a scenario about dealers of precious metal dealers and high-value items, identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.21 Given a scenario about dealers of real estate, identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.22 Given a scenario about bureaux de change and money services businesses, identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.23 Given a scenario about lawyers, notaries, accountants, and auditors, identify the red flags that indicate money laundering or financing terrorism.</p> | <p>1.24 Given a scenario, identify the red flags that indicate human trafficking.</p> <p>1.25 Given a scenario about financial transactions that offer anonymity, identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.26 Given a scenario about lack of transparency of ownership (e.g., shell companies, trusts), identify the red flags that indicate money laundering or financing terrorism.</p> <p>1.27 Given a scenario about moving money, identify the red flags that indicate money laundering or financing terrorism could be occurring.</p> <p>1.28 Given a scenario involving commercial transactions, identify the red flags that indicate how trade-based money laundering could be occurring</p> |
|--|--|

### II. COMPLIANCE STANDARDS FOR ANTI-MONEY LAUNDERING (AML) AND COMBATING THE FINANCING OF TERRORISM (CFT) 25%

- |   |   |
|---|---|
| <p>2.1 Identify the key aspects of the FATF 40 Recommendations.</p> <p>2.2 Identify the process that FATF uses to raise awareness of certain jurisdictions with lax AML controls.</p> <p>2.3 Identify key aspects of BASEL Committee Customer Due Diligence Principles.</p> <p>2.4 Identify key aspects of the Wolfsberg Group's AML Principles as they relate to private banking.</p> <p>2.5 Identify key aspects of the Wolfsberg Group's AML Principles as they relate to correspondent banking.</p> | <p>2.6 Identify the key aspects of the EU Directives on money laundering.</p> <p>2.7 Identify key aspects of the USA PATRIOT Act that have extraterritorial reach.</p> <p>2.8 Identify key aspects of OFAC sanctions that have extraterritorial reach.</p> <p>2.9 Given a scenario involving a non-US financial institution, identify the extraterritorial impact of the USA PATRIOT Act.</p> <p>2.10. Identify the key roles of regional FATF-style bodies.</p> <p>2.11 Identify the key objectives of the Egmont Group.</p> |
|---|---|

## CAMS Examination *continued*

### III. AML, CFT AND SANCTIONS COMPLIANCE PROGRAMS 28%

- |      |   |      |   |
|------|---|------|---|
| 3.1  | Identify the components of an institution-wide risk assessment.   | 3.16 | Given a scenario including red flags associated with transactions or account activity, identify how the institution should respond to the red flags.  |
| 3.2  | Given a scenario with unmitigated risks, identify the appropriate course of action that should be taken.  | 3.17 | Given a scenario including red flags associated with employee activity, identify how the institution should respond to the suspicious activity.   |
| 3.3  | Given a scenario of institution-wide controls, record-keeping requirements and other mitigating factors, identify how these components should be applied.   | 3.18 | Given a scenario, identify situations in which the SAR/STR should be filed.   |
| 3.4  | Given a scenario, identify the key aspects of delivering targeted training for different audiences and job functions.   | 3.19 | Given a scenario, identify how the SAR/STR information in the documents should be protected.  |
| 3.5  | Given a scenario, identify key components of an AML training program.   | 3.20 | Given a scenario, identify how to respond to law enforcement/governmental requests.   |
| 3.6  | Identify the roles senior management and the board of directors play in how an institution addresses AML oversight.   | 3.21 | Given a scenario about an institution operating with multiple lines of business and/or in multiple jurisdictions, identify the important aspects of implementing an enterprise-wide approach to managing money laundering risk. |
| 3.7  | Given a scenario, identify the roles senior management and board of directors play in how the institution addresses AML governance.   | 3.22 | Given a scenario, identify appropriate steps to take to comply with sanctions requirements.   |
| 3.8  | Given a scenario, identify how customer onboarding should be implemented for the institution.   | 3.23 | Identify sources for maintaining up-to-date sanctions lists.  |
| 3.9  | Given a scenario, identify areas to increase the efficiency and accuracy of automated AML tools.  | 3.24 | Given a scenario about a relationship with a PEP, identify the appropriate steps to mitigate the risk.  |
| 3.10 | Given a scenario, identify customers and potential employees that would warrant enhanced due diligence.   | 3.25 | Given a scenario, identify internal and external factors that can cause a reassessment of the current AML program.  |
| 3.11 | Given a scenario, identify the steps that should be followed to trace funds through a financial institution.  | 3.26 | Given a scenario, identify when and how to implement necessary program changes (e.g., policy/procedure change, enhanced training).  |
| 3.12 | Given a scenario including general client behavior, identify the suspicious behavior.   | 3.27 | Given a scenario, identify the process to assess the money laundering and sanctions risk associated with new products and services.   |
| 3.13 | Given a scenario including some suspicious client behavior, identify how the institution should respond to these behaviors.   | 3.28 | Given a scenario, identify internal or external factors that should be escalated to management and/or the board of directors.   |
| 3.14 | Given a scenario, identify the red flags and pressures (internal and external) with obscuring wire transfer information (e.g., beneficiary, originator).  | 3.29 | Given a scenario, identify how to respond to AML audit findings and/or regulator findings.  |
| 3.15 | Given a scenario, identify red flags associated with transactions or use of accounts (e.g., cash transactions, non-cash deposits, wire transfers, credit transactions, trade financing, investment activity). | 3.30 | Given a scenario, identify the importance of ensuring the independence of an audit of the AML program.  |
|      |   | 3.31 | Given a scenario, identify an appropriate risk-based approach to AML audits.  |

## CAMS Examination *continued*

### IV. CONDUCTING AND SUPPORTING THE INVESTIGATION PROCESS 21%

- 4.1 Given a scenario about a high profile SAR/STR, identify how to report it to management/board of directors.
- 4.2 Given a scenario, identify the appropriate manner to report a SAR/STR to authorities.
- 4.3 Identify how to maintain and secure all supporting documentation used to identify suspicious activity.
- 4.4 Given a scenario, identify factors that indicate an institution should exit a relationship due to excessive money laundering risk.
- 4.5 Given a scenario, identify factors that should be considered to keep an account open based on a law enforcement agency request.
- 4.6 Given a scenario with an institution conducting an investigation of a customer, identify the areas and/or records it should examine.
- 4.7 Given a scenario with a regulatory or law enforcement agency conducting an investigation of an institution's customer, identify the additional steps the institution should take.
- 4.8 Given a scenario with an institution being investigated by a regulatory or law enforcement agency, identify actions the institution should take.
- 4.9 Identify the factors that must be considered before institutions share customer-related information across and within the same jurisdiction.
- 4.10. Given a scenario involving a senior level employee engaged in potentially suspicious behavior, identify how address a potential AML situation (e.g., board member, CEO).
- 4.11 Identify appropriate techniques that can be used for interviewing potential parties involved in an AML event.
- 4.12 Given a scenario, identify the available public source data and other sources that can be used in an investigation.
- 4.13 Identify the methods that law enforcement agencies may use to request information from an institution.
- 4.14 Identify the types of information law enforcement agencies typically ask for from institutions during investigations.
- 4.15 Identify how authorities (e.g., FIUs, central banks, governments, regulatory bodies) can cooperate and provide assistance when conducting cross-border money laundering investigations.
- 4.16 Identify what a government FIU does and how it interacts with the public and private sectors.
- 4.17 Identify the role of strict safeguards on privacy and data protection in AML investigations.



# What You Need Before The Exam With Pearson Vue



## Reschedule/Cancellation Policy Regarding Your Exam Date

Refunds will not be granted to individuals requesting to withdraw from an exam after registering. You can reschedule or cancel on the web up to 72 hours before the exam at no charge. You can also reschedule or cancel via the Pearson VUE call center (+1 866-389-8339) up to 72 hours before the exam for a fee of US\$20.

If you cancel or reschedule an exam within 24 to 72 hours of your scheduled time, there will be a fee of US\$100 collected by Pearson VUE. There is an additional fee for scheduling an exam by phone rather than by using the online system. Pearson VUE call centers will answer questions for assisting with online scheduling free of charge. However, if the exam is scheduled on the phone, there will be a US\$20 fee collected by Pearson VUE.

If you cancel your exam within 24 hours or do not show up for your scheduled appointment, you will need to contact ACAMS and you will be charged for a new authorization (US\$299 private sector/US\$199 public sector).

## Examination Day

Plan to arrive/login 30 minutes before the scheduled appointment to allow time for check-in. Candidates who are late may not be allowed to test.

## Identification

Bring with you two forms of current and valid government-issued identification bearing a photograph and a signature. The name on the identification must match the name used for registration.

## Identification (ID) Requirements:

- The first and last name that the candidate uses to register must match exactly the first and last name on both of the IDs that are presented on test day.
- All IDs required must be issued by the country/region in which the candidate is testing. If the candidate does not have a qualifying primary ID issued from the country/region they are testing in, an International Travel Passport from their country/region of citizenship is required, along with a secondary ID.
- Candidate is required to present two forms of original (no photo copies or digital IDs), valid (unexpired) IDs; one form as a primary ID (government issued with name, recent recognizable photo, and signature) and one form as a secondary ID (with at least a name and signature, or name and recent recognizable photo).

## Additional ID Allowances:

- Expired forms of ID are not acceptable unless accompanied by valid renewal papers.
- For candidates testing in Japan, please click on the [link](#) for Japan ID policy.
- If a government issued ID is missing a visible signature (or has an embedded signature), the candidate is allowed to test as long as the other requirements for primary and secondary IDs are met.
- If you have any questions about the ID you are required to bring with you to the testing center for admittance for your exam, please contact Pearson VUE customer service at [www.pearsonvue.com/contact](http://www.pearsonvue.com/contact). Any candidate exceptions to the ID policy must be pre-approved by the Pearson VUE customer service center at least three business days before the scheduled exam appointment.

## What You Need Before The Exam With Pearson Vue *continued*

### Examination Integrity/ Professional Dishonesty

The examination performance of all candidates is monitored and may be analyzed statistically for purposes of detecting and verifying any form of cheating. Candidates are also advised that they cannot disclose Exam Materials, including questions or answers. This includes discussing the content of the exam with anyone, recording, copying, or disclosing any exam question or answer, in whole or in part, directly or indirectly, in any form or by any means whatsoever (this includes "chat rooms", message boards, forums, etc.) If it is determined that a score has questionable validity, after appropriate review, the score will be marked as invalid and the candidate may be barred from retesting indefinitely or for a period as determined by ACAMS.

### Examination Procedures and Code of Conduct

You will have three and a half hours to complete the exam.

Additional time will not be allowed. There are no scheduled breaks. Candidates must have the permission of the proctor to leave the testing room.

No questions concerning the content of the exam may be asked during the testing period. It is the responsibility of each candidate to read the directions given on the computer and listen carefully to the instructions given by the proctor.

The proctor reserves the right to dismiss a candidate from the examination for any of the following reasons:

1. If the candidate's admission to the exam is unauthorized.
2. If a candidate creates a disturbance, is abusive or is otherwise uncooperative.
3. If a candidate gives or receives help or is suspected of doing so.
4. If a candidate attempts to remove examination materials or notes from the testing room.
5. If a candidate is discovered in possession of an electronic communication or recording device.

### Confidentiality

Candidates receive their exam results immediately (pass or fail) at the conclusion of the test. Results will not be given over the telephone, by facsimile, or electronic mail. When an organization pays for an individual's examination, the organization may request ACAMS to release the result to the organization. If a candidate does not want this information to be released to the organization, then the candidate must notify ACAMS in writing.

ACAMS posts a list of certified members on [www.acams.org](http://www.acams.org).

### To schedule a re-take, the candidate must:

1. Request an invoice through the [Contact Us](#) page online.
2. Pay the examination fee for their new Authorization to Test: US\$299 for Private members and US\$199 for Public members.
3. Reschedule their exam through the test delivery website.

### Appeals

ACAMS provides an appeal mechanism for challenging denial of admission to the exam or revocation of the certification. It is the responsibility of the individual to initiate the appeal process by written request to ACAMS within 30 days of the circumstance leading to the appeal. Please note: Failure of the exam does not constitute grounds for a review and appeal.

### Data and Privacy Policies

To read through Pearson Vue's data and privacy policies please visit <https://home.pearsonvue.com/privacy>.

## What You Need Before The Exam With Pearson Vue *continued*

### Pearson VUE Demo

If you would like a preview of the Pearson VUE computer-based testing platform, [click here](#) to launch the demo. It includes information about question types and the user interface so that you can become familiar with it prior to taking your exam.

### Integrity of the Examination

ACAMS has taken strict security measures to ensure the integrity of the CAMS examination. These security measures include:

**Proctors** – There will be examination proctors present before, during, and after the examination to ensure that all rules and regulations are followed.

**Video Cameras** – There are high-tech video cameras surrounding the examination site of every testing center to ensure that no assistance is given during the examination.

**Audio** – There is a live audio recording of each examination session to ensure that no assistance is given during the examination.

### Retaking the Examination

If a candidate does not pass, they will have the opportunity to retake the examination based on the following retake policy:

- Candidates who do not pass the exam on their first attempt can retake it after 30 days.
- Candidates who do not pass the exam on their second attempt can retake it after 60 days.
- Candidates who do not pass the exam on their third or more attempt can retake it after 90 days.

A candidate who applies for re-examination after one year following their original application must pay the full examination fee.

### Test Center

#### ITEMS NOT PERMITTED

No personal items, including but not limited to mobile phones, hand-held computers/personal digital assistants (PDAs) or other electronic devices, pagers,

watches, wallets, purses, firearms or other weapons, hats (and other non-religious head coverings), bags, coats, jackets, eyeglass cases, pens, or pencils, are allowed in the testing room. No barrettes or hair clips that are larger than 1/4 inch (1/2 centimeter) wide and headbands or hairbands that are larger than 1/2 inch (1 centimeter) wide are allowed in the testing room. No jewelry that is removable and larger than 1/4 inch (1/2 centimeter) wide is allowed in the testing room. No books and/or notes are allowed in the testing room unless authorized by the test program sponsor for your use during the test. You must store all personal items in a secure area as indicated by the test administrator or return them to your vehicle. If you refuse to store your personal items, you will be unable to test, and you will lose your test fee. All electronic devices must be turned off before storing them in the designated secure area.

#### CENTER PROBLEM REPORTING

If there are any irregularities during the examination process, the proctor at each testing center will fill out a Center Problem Report which records the exact details of the irregular incident.

#### INCLEMENT WEATHER

In the event of inclement weather or unforeseen emergencies on the day of an exam, ACAMS will determine whether circumstances warrant cancellation and subsequent rescheduling of an exam. Every attempt will be made to administer all exams as scheduled. However, should an exam be canceled at a test center, all scheduled candidates will be contacted and receive notification regarding a rescheduled date or reapplication instructions.

### Home or Office

#### ONLINE PROCTORING

ACAMS may be offering online proctoring at your home or office for candidates taking their certification in certain locations. Test Taker must read the [FAQ](#) for Online Proctored Exam's limitations and restrictions.

# CAMS Recertification Policies

The purpose of the CAMS recertification process is to ensure that Certified Anti-Money Laundering Specialists continue to maintain and enhance their anti-money laundering expertise. Therefore, CAMS professionals are required to earn continuing education credits through training, education and other professional development activities as outlined below.

## Recertification Requirements

In order to recertify the CAMS credential, you must meet the following requirements:

1. Maintain an active ACAMS membership
2. Meet the Continuing Education credit requirements
3. Submit an online application with the appropriate renewal fees

## Continuing Education Credit Requirements

- A total of 60 continuing education credits must be accumulated within a three-year cycle.
- A minimum of twelve (12) of the total credits must be earned from ACAMS-provided training. Please note that this means that CAMS credits earned from other providers will not count towards the 12 credits of required ACAMS-provided training.
- Applicants will not be granted continuing education credits for activities completed prior to obtaining their CAMS credential or their most recent recertification.
- Additional credits earned past the required 60 cannot be rolled over to the following cycle.
- The deadline for earning continuing education credits is December 15 of the year of your recertification.

## Accredited Courses

ACAMS will not accept credits towards recertification from non-ACAMS accredited activities. A full list of accredited courses can be found on the ACAMS site <http://www.acams.org/cams-accreditation/>.

## Deadline for CAMS Recertification

Recertification applicants are required to submit both a completed CAMS Recertification Application and the associated fees postmarked no later than December 15 of the third year after receiving their initial certification or their most recent recertification. A late fee of US\$50 will be applied to all applicants who miss the December 15 deadline and will be accepted for only 90 days after the deadline.

## Documentation

Applicants do not need to include supporting documentation along with the recertification application; however, they are advised to retain original copies of their supporting documents in their files in the event that ACAMS should find it necessary to audit their records.

## Recertification Audit

The ACAMS audit process has been created to ensure ACAMS certified individuals have complied with their recertification requirements.

Audits are performed for every recertifying class. ACAMS will notify selected audit candidates advising them of the processes.

## Recertification Fees

Recertification Fees		
<b>Early Application fee</b>	<b>US\$200</b>	Application and fee must be postmarked no later than <b>October 1</b> .
<b>Regular Application</b>	<b>US\$250</b>	Application and fee must be postmarked no later than <b>December 15</b> .
<b>Late Application</b>	<b>US\$300</b>	Application and fee must be postmarked no later than <b>March 31</b> .

*ACAMS will not accept late recertification applications postmarked after March 31. Checks, credit cards and wire-transfers are acceptable forms of payment.*

## CAMS Recertification Policies *continued*

### Loss of Certification

- Those who fail to recertify by the late application deadline of March 31 will have their certification revoked.
- Those who fail to maintain an ACAMS membership will have their certification revoked.
- CAMS professionals who lapse in their recertification may recertify only by successfully retaking and passing the CAMS examination.

### Membership Status

Recertification applicants must maintain an active ACAMS membership over the 3-year period in order to recertify.

### Recertification Fee

Fees must be submitted by the deadlines indicated and are non-refundable. Recertification fees are subject to change without notice. Applicants who submit applications with the inappropriate payment amount will be invoiced the difference and will remain unprocessed until the amount is paid in full. Fees can be paid by credit card, wire transfer or by check made payable to ACAMS. Please do not send cash. The applicant's name and company must appear on all payments made by check or wire.

### Recertification Cycle

The recertification cycle is the three-year period from the time an individual receives their certification or from the date of their most recent recertification.

### Application

Please complete the online application [here](#). Allow 5-7 business days from the time ACAMS receives your application for review and notification. Applications submitted near a deadline (e.g., October 1, December 15, or March 31) may take longer to review due to the higher volume of recertification applications received.

### Late Application Policy

After the Late Application deadline of March 31, a member must take the CAMS examination to obtain the CAMS designation. Exceptions will only be considered if they are due to a documented extenuating circumstance as described below under the section labeled "Extensions."

### Extensions

Occasionally, extenuating circumstances—such as prolonged unemployment or serious illness of the applicant or a close family member (e.g. spouse or child)—may prevent an individual from meeting the required credits of continuing education over a three-year period. One-year extensions of the recertification deadline can be requested in such circumstances. The extension can be used only once during a member's recertification career and must be approved at least three months prior to the first recertification deadline (October 1). The fee to request an extension is US\$100. Members may also choose to recertify by examination on or before their recertification deadline. Examples of who may be eligible for an extension:

1. Members who have been out of work for at least one year of the three-year recertification cycle due to being laid off or child birth/childcare.
2. Members who have spent a significant amount of time caring for a seriously ill family member or who have suffered serious illness themselves.
3. Members who are being deployed to active duty in one of the armed forces for at least a one-year assignment.

If the extension is approved, the recertification expiration date will be extended for one year allowing enough time to accumulate the necessary continuing education credits. At the end of that period, members will be required to submit a completed recertification application form demonstrating that they have successfully met the continuing education requirements. The full recertification application fee is also due at that time. Upon successful recertification, the new three-year recertification cycle will begin at the end of the extension period.

To request an extension, the following documents must be submitted at least three months prior to the first recertification deadline (October 1):

## CAMS Recertification Policies *continued*

1. A written request for extension providing a description of the extenuating circumstance should be sent to [certification@acams.org](mailto:certification@acams.org).
2. Documentation of the extenuating circumstance. This may include a letter from a physician, notice of termination or receipt of unemployment benefits.
3. The extension fee of US\$100.
4. A completed recertification application demonstrating the efforts made to meet the recertification requirements.

### Extension Non-Eligibility

Members who have not accrued the required recertification credits by their deadline date or have lapsed a recertification cycle are not eligible for an extension.

### Lapsed Certifications

Members who do not submit an application within three months after their recertification deadline (March 31) will be considered no longer certified and must immediately cease using the CAMS designation. To become certified the candidate must purchase the CAMS certification package and retake the exam.

### Recertification by Examination

Those who opt to recertify by examination must submit a written request with payment by the Regular Application deadline (December 15). The cost to retake the exam is US\$299. This fee is subject to change without notice. Applicants who submit their paperwork without the appropriate payment amount will be invoiced the difference and will remain unprocessed until the amount is paid in full. Fees can be paid by credit card, wire transfer, or by check made payable to ACAMS. Please do not send cash. The applicant's name and company must appear on all payments made by check. This fee is non-refundable.

Applicants do not need to submit a new examination form for this option.

### Reminders and Application Submission

Members should keep track of their recertification cycles and submit a completed application on or before their recertification deadline. As a professional courtesy, ACAMS will send at least two reminder e-mails to all members before the end of their recertification cycles: one approximately six months before the expiration date and the other approximately three months before the recertification deadline. **ACAMS will send the reminders to the e-mail address on file; therefore, it is important to make sure you notify ACAMS of any changes.** Recertification cycles and submission requirements will not be changed because a member did not receive reminders that were sent to the address on file.



# CAMS Recertification Worksheet

## Recertification Activities

A total of sixty (60) Continuing Education Credits must be earned within a three-year cycle from the year of certification. Members are required to earn twelve (12) of the total credits from attending ACAMS training events. Additionally, two (2) credits may be earned on the topic of ethics. Please refer to table below for guidance on applicable continuing education.

		Credits	Limit
<b>1</b>	<b>PROFESSIONAL EXPERIENCE</b>		
1.1	Full-time professional experience in the field of money laundering control and/or related fields* for either the public or private sector	8/year	24/cycle
<b>2</b>	<b>ASSOCIATION MEMBERSHIP</b>		
2.1	Uninterrupted membership with ACAMS	4/year	12/cycle
<b>3</b>	<b>ACAMS EDUCATIONAL COURSES, PROGRAMS AND SEMINARS</b>		
3.1	Attendance at a conference, workshop, seminar, webinar, symposium, educational and/or training session about money laundering control and/or related topics* hosted by ACAMS	1/hour	Unlimited
<b>4</b>	<b>EDUCATIONAL COURSES, PROGRAMS AND SEMINARS</b>		
4.1	Attendance at a conference, workshop, seminar, webinar, symposium, educational and/or training session about money laundering control and/or related topics*	1/hour	Unlimited
4.2	Completion of a compliance school offered by an accredited college, university or your country's Bankers Association or equivalent	6 each	12/cycle
4.3	Obtaining other professional certifications and/or licenses within the three-year recertification cycle (includes CPA, CFE, MICA, CPP, CRCM, or similar credentials)	4 each	4/cycle
<b>5</b>	<b>INSTRUCTION, SPEECHES AND OTHER PRESENTATIONS</b>		
5.1	Instructor, speaker, panelist or moderator at a conference, workshop, seminar, symposium, educational and/or training session on the subject of money laundering control and/or related topics*	3 each	Unlimited
5.2	Principal instructor or speaker for a course at an accredited college or university on the subject of money laundering control and/or related topics*	6 each	12/cycle
<b>6</b>	<b>AUTHORSHIP OF A PUBLISHED WORK</b>		
6.1	Authorship of a published book on the subject of money laundering control and/or related topics*	8 each	Unlimited
6.2	Contribution to a published book on the subject of money laundering control and/or related topics*	3 each	Unlimited
6.3	Authorship of a published article or booklet on the subject of money laundering control and/or related topics*	3 each	Unlimited
<b>7</b>	<b>VOLUNTEER SERVICE</b>		
7.1	Active member of the ACAMS Advisory Board or an ACAMS Chapter Executive Board (criteria for active participation will be set forth and evaluated by each board or committee)	4/year	12/cycle
7.2	Member of an Executive Committee, Board of Directors or Advisory Board of a professional association	4/year	12/cycle
7.3	Service on a host committee for an annual or major conference on the subject of money laundering control and/or related topics*	3/post	9/cycle
7.4	Delegate to an international body (i.e. FATF, CFATF, etc.) whose mission relates to the subject of money laundering control and/or related topics*	5/post	10/cycle
<b>8</b>	<b>OTHER ACCOMPLISHMENTS</b>		
8.1	Testimony in a court as an expert witness on money laundering control and/or related topics*	4/case	8/cycle
8.2	Special activities related to the topic of money laundering control or related subjects* (acceptance and credit assessment is at the discretion of ACAMS)	1-6/ activity	6/cycle

### TOTAL CREDITS EARNED

### GRAND TOTAL

\* Examples include fraud prevention, risk management, regulatory compliance, terrorist finance control, security, technology (as it relates to any of the aforementioned topics), and/or other related subjects. The credits awarded for activities under this matrix are subject to change without notice.

# Contact Us

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A PUBLICATION OF

**ACAMS**  THE

THIS IS **EXHIBIT "3"** TO THE  
AFFIDAVIT OF **KEVIN DEBRUYCKERE**  
SWORN BEFORE ME AT VANCOUVER,  
BC ON THE 19th DAY OF JANUARY, 2021.

A handwritten signature in green ink, appearing to be "B. L. O.", written over a horizontal line.

A Commissioner/Notary Public for the  
Province of British Columbia.



# **Project ATHENA Subcommittee Meeting**

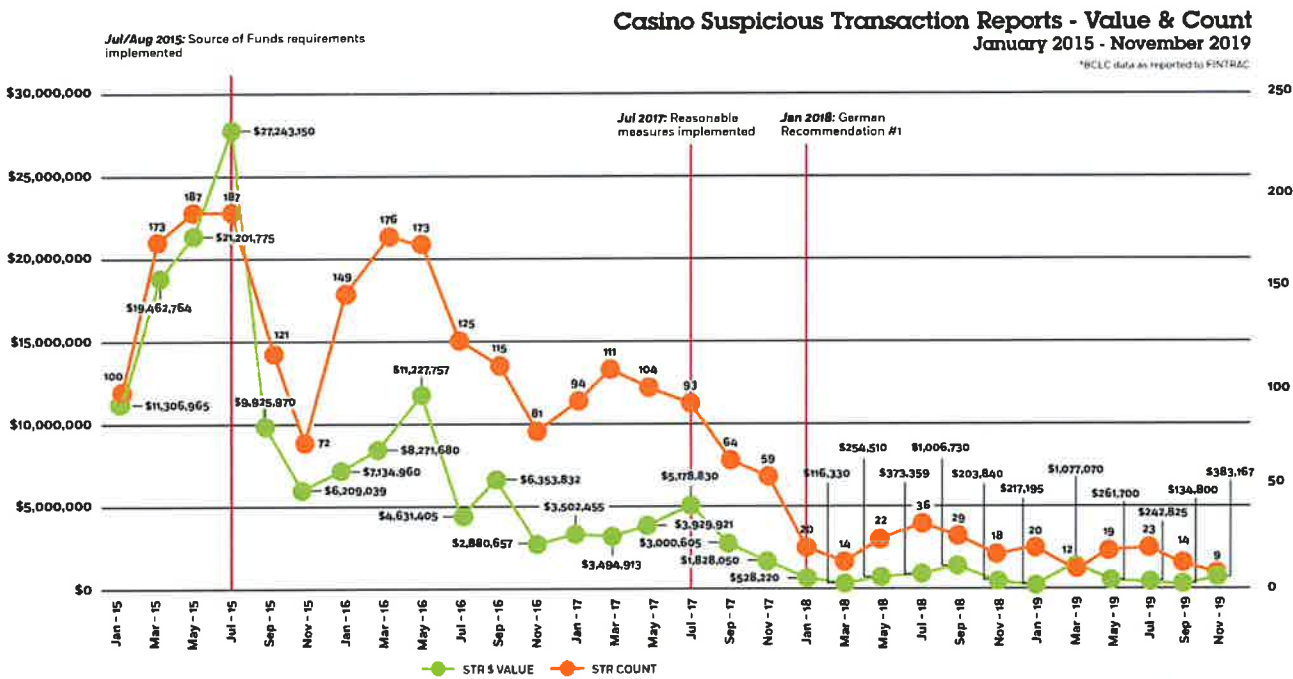
**FEBRUARY 6<sup>TH</sup>, 2020**

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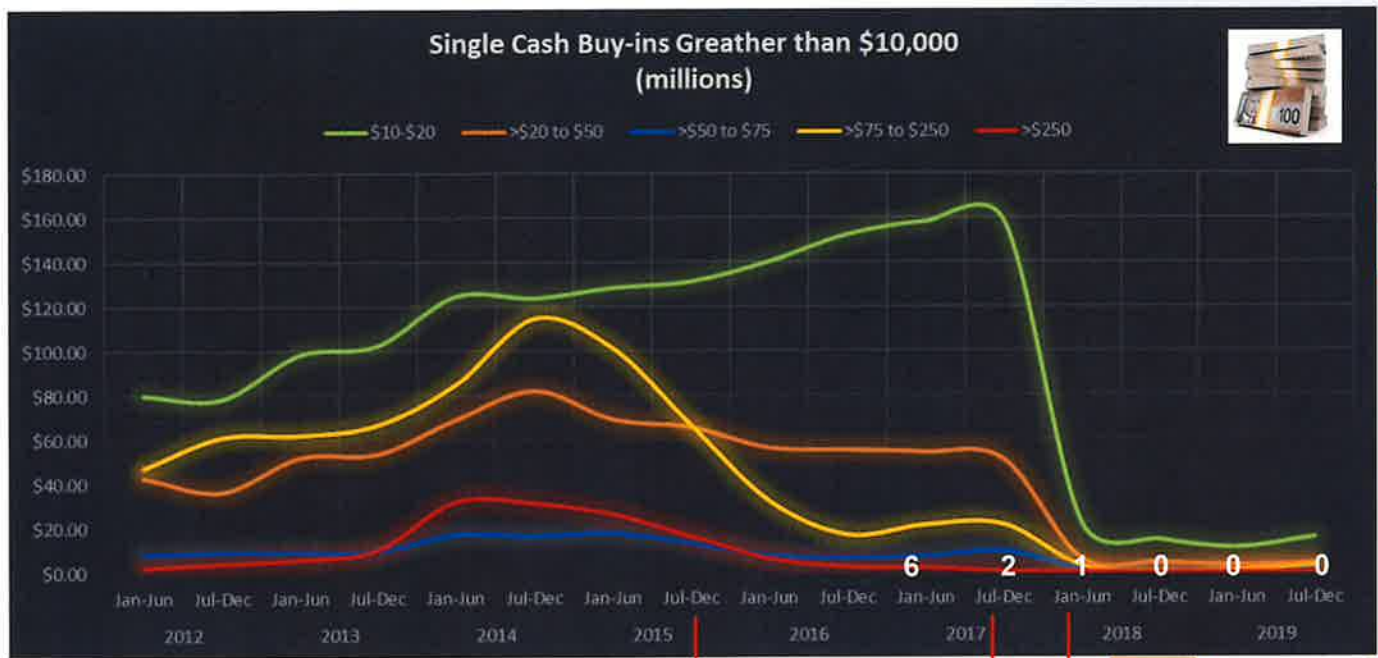
Overall Bank Draft Trend	Bank Draft Fraud	eGaming Deposits
Financial Institute Summary	Cash Analysis	eGaming -Withdrawal Protocol -Deposit Protocol
Cash & PGF buy-ins Greater than \$10,000	STRs & Programs Chart	Due Diligence
Top Branches <div></div>		Cheques <b>Convenience</b> <b>Return of Funds</b> <b>Verified Win</b>

# STR Trend and Programs



# Cash Analysis

24



4

Jul/Aug 2015: Source of Funds implemented

Jul 2017: Reasonable Measures Implemented

Jan 2018: German Recommendation #1



**bclc**

BCLC0010276.04

# LCT & PGF Buy-in Trend

25



5

Jul/Aug 2015: Source of Funds Implemented

Jul 2017: Reasonable Measures implemented

Jan 2018: German Recommendation #1



**bccl**

BCLC0010276.05

# Bank Draft/Certified Cheque Trend



1014 cheques  
totalling \$49.4M



# Financial Institution Summary

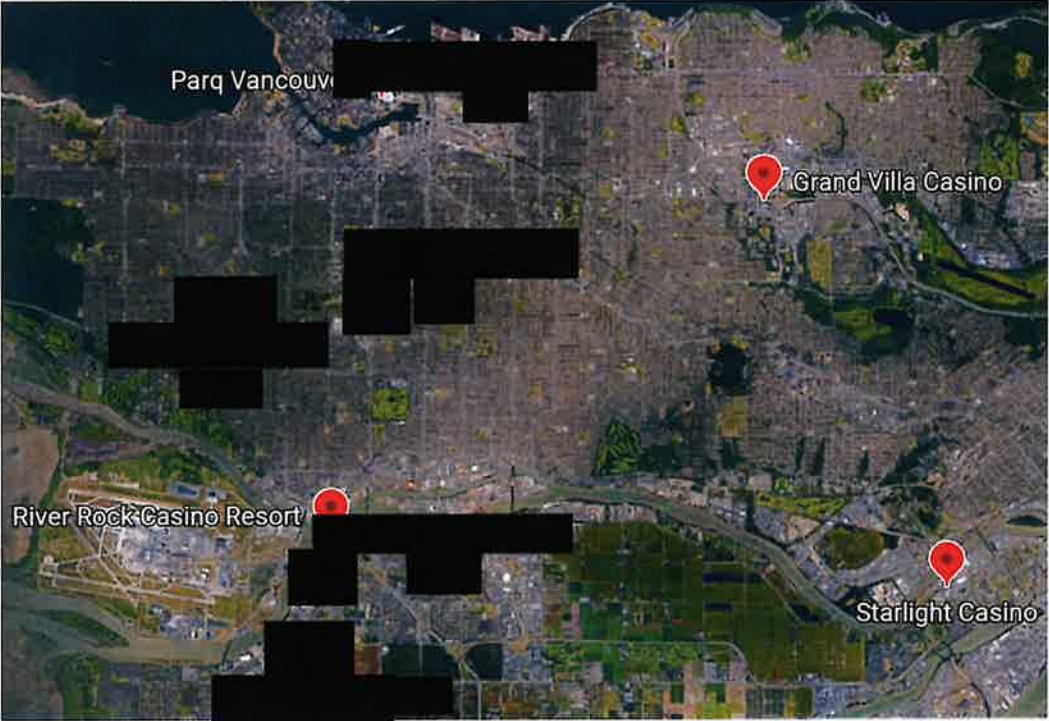
Jul to Dec 2019

	Amount			Count	
	\$	20,071,213	41%	425	42%
	\$	12,649,515	26%	210	21%
	\$	9,035,800	18%	170	17%
	\$	4,518,634	9%	146	14%
	\$	1,063,500	2%	28	3%
	\$	1,245,000	3%	16	2%
	\$	435,155	1%	9	1%
	\$	404,000	1%	9	1%
	\$	10,000	0.02%	1	0.1%
Grand Total	\$	49,432,818		1014	



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Top [redacted] Branches



8

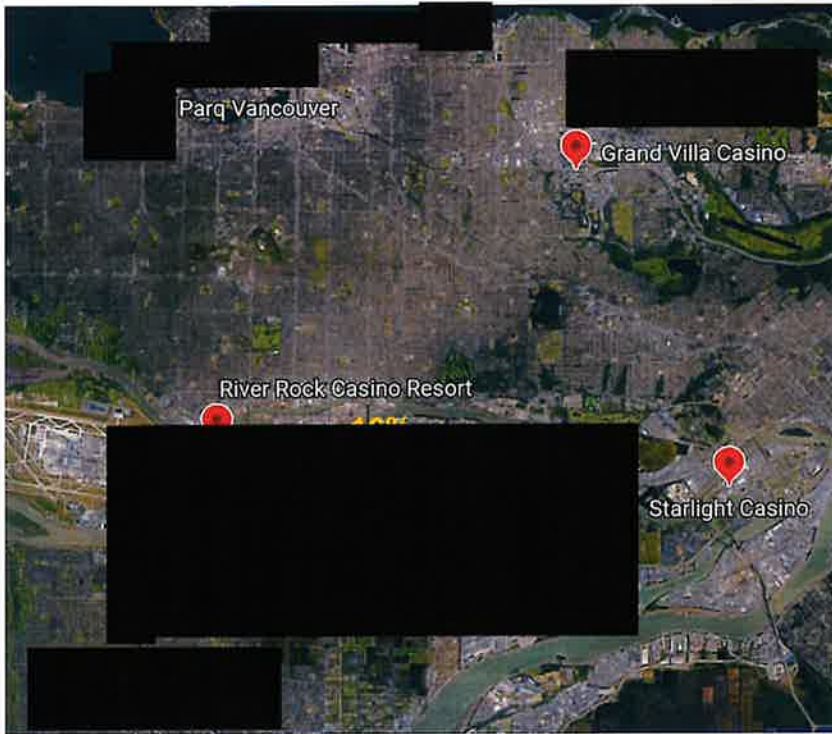
Top 5 Branches = 42%

20 (6+ Bank Drafts)  
23 (2-5 Bank Drafts)  
28 (1 Bank Draft)  
76 different branches

425 cheques total



## Top [REDACTED] Branches

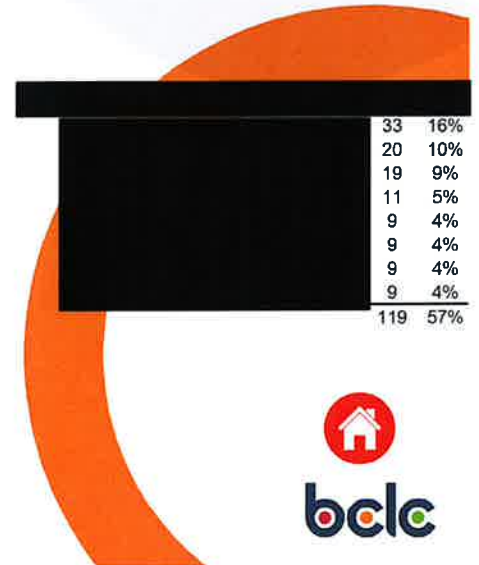


9

Top 5 Branches = 57%

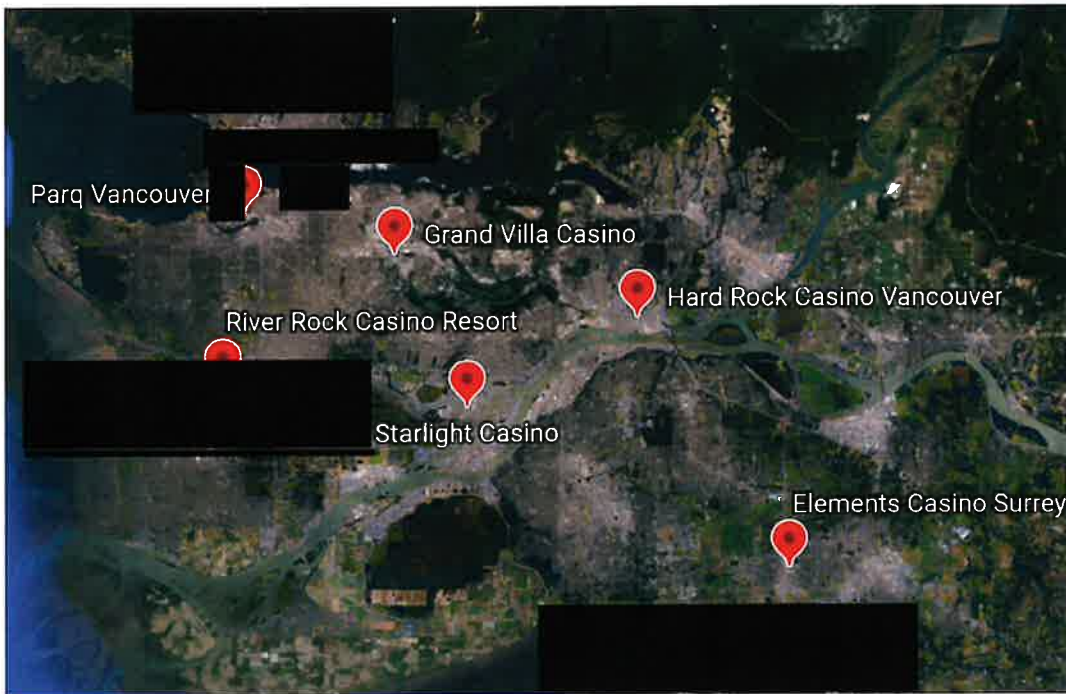
11 (6+ Bank Drafts) 29  
 20 (2-5 Bank Drafts)  
 10 (1 Bank Draft)  
 41 different branches

210 cheques total



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## Top [REDACTED] Branches



11 (6+ Bank Drafts) 30  
 17 (2-5 Bank Drafts)  
21 (1 Bank Draft)  
 49 different branches

170 cheques total

16	9%
10	6%
10	6%
9	5%
9	5%
54	32%

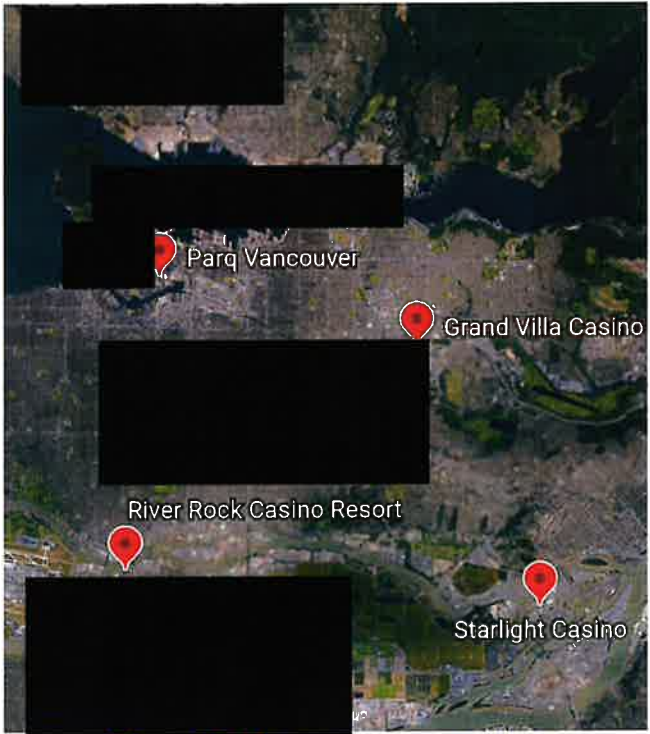
10

**Top 5 Branches = 32%**



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Top [redacted] Branches

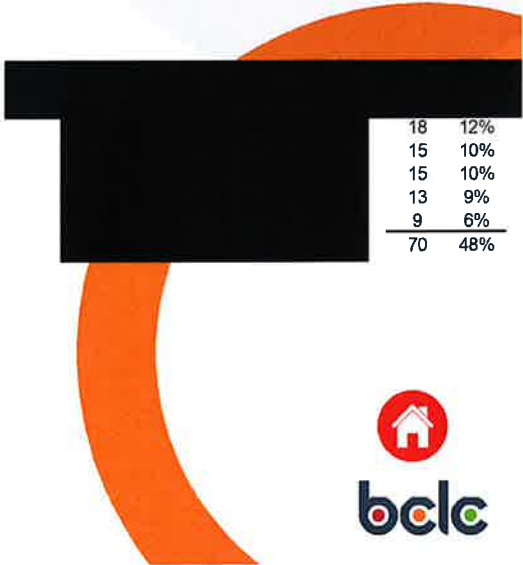


Top 5 Branches = 48%

11

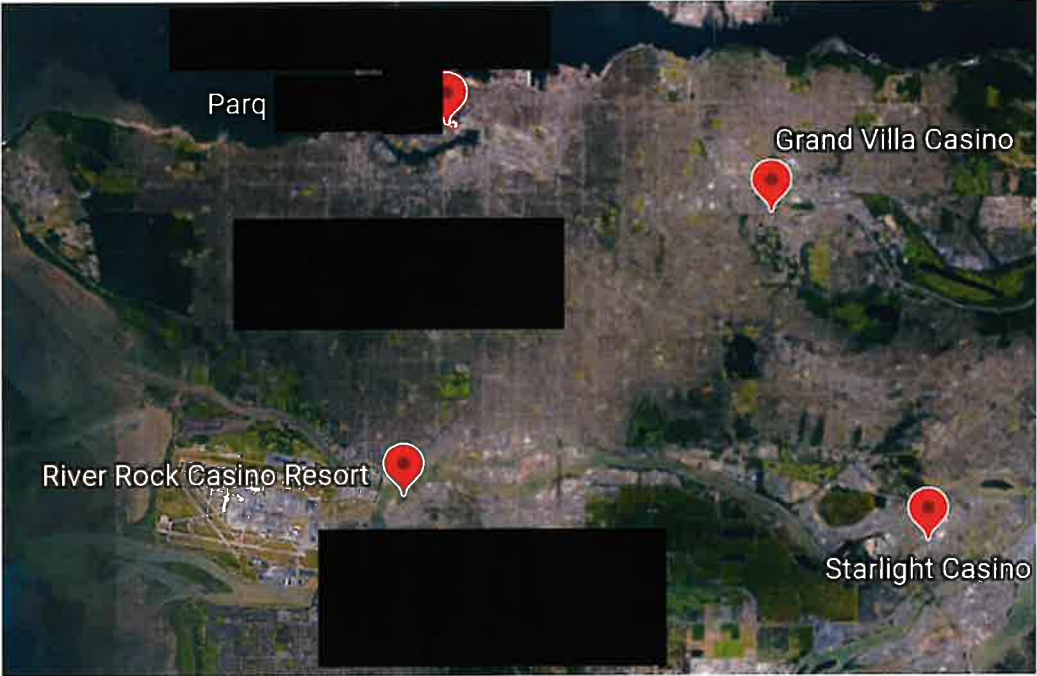
9 (6+ Bank Drafts)  
12 (2-5 Bank Drafts)  
12 (1 Bank Draft)  
33 different branches

146 cheques total



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# Top [redacted] Branches



12

Top 3 Branches = 82%

1 (6+ Bank Drafts)  
3 (2-5 Bank Drafts)  
3 (1 Bank Draft)  
7 different branches

32

28 cheques total



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Top [REDACTED] Branches

	Count
[REDACTED]	2
[REDACTED]	2
[REDACTED]	2
[REDACTED]	2
[REDACTED]	1
[REDACTED]	1
[REDACTED]	1
[REDACTED]	1
[REDACTED]	1
[REDACTED]	1
[REDACTED]	1
Grand Total	16



## Bank Draft Fraud

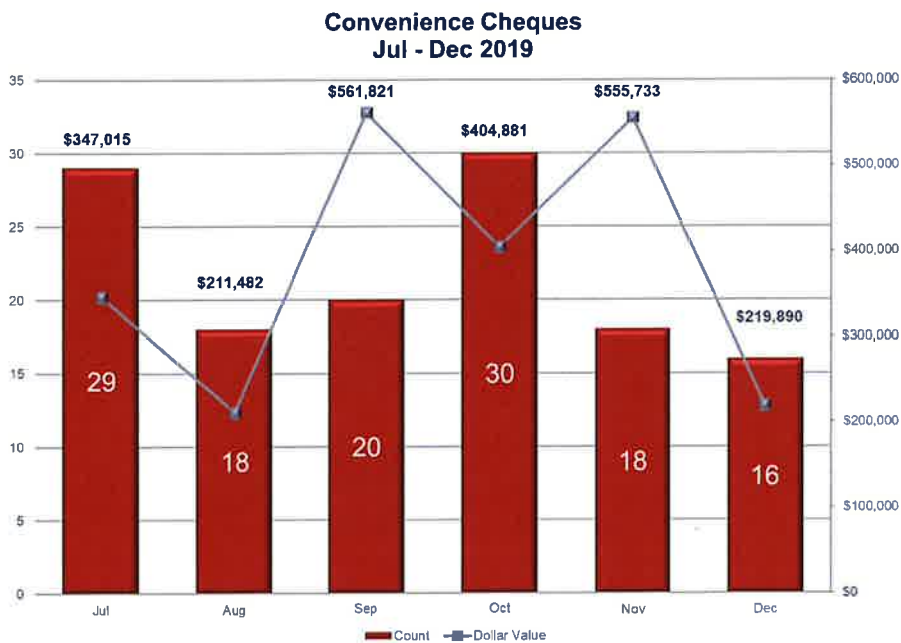


- “Duplicate Payment Fraud” via mobile app cheque image deposit
  - Cheque made out to player’s name
  - Back of cheque endorsed
- 2 incidents, 1 player (\$15,000 & \$28,000) occurring at 2 different casinos

██████████ up to \$250,000<sup>34</sup>  
██████████ \$15,000 daily limit  
██████████ \$30,000 30-day limit  
██████████ up to \$500,000  
██████████ up to \$25,000



# Convenience Cheques



All cheques are labelled  
"Return of Funds- Non-Gaming Winnings"

131 cheques  
totalling \$2.3M



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# Return of Funds Cheques

PGF - Return of Funds Cheques  
Jul - Dec 2019

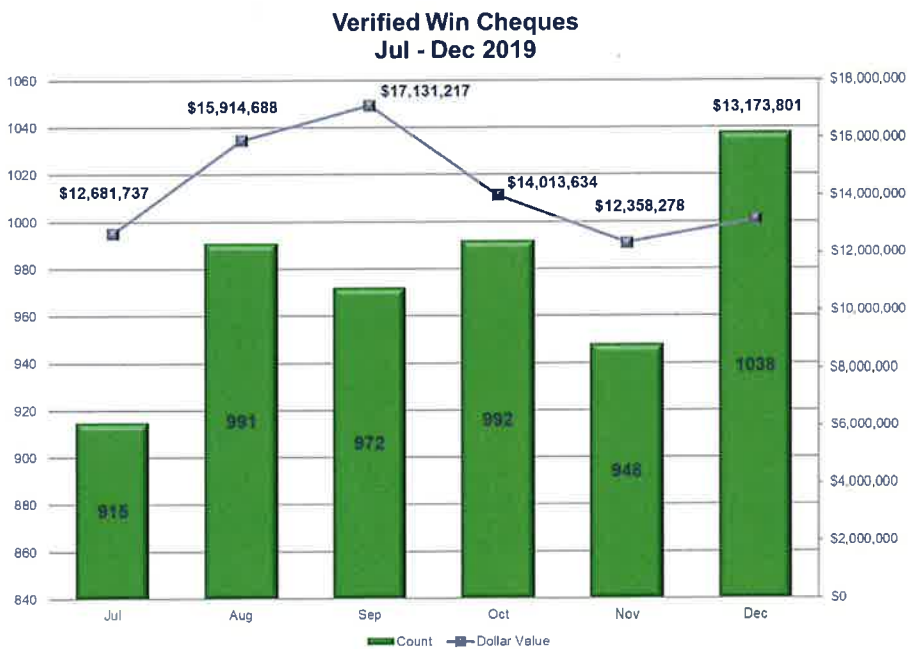


All cheques are labelled  
"Return of Funds- Non-Gaming Winnings"

416 cheques  
totalling \$24.9M



# Verified Win Cheques



All cheques are labelled  
"Verified Win"

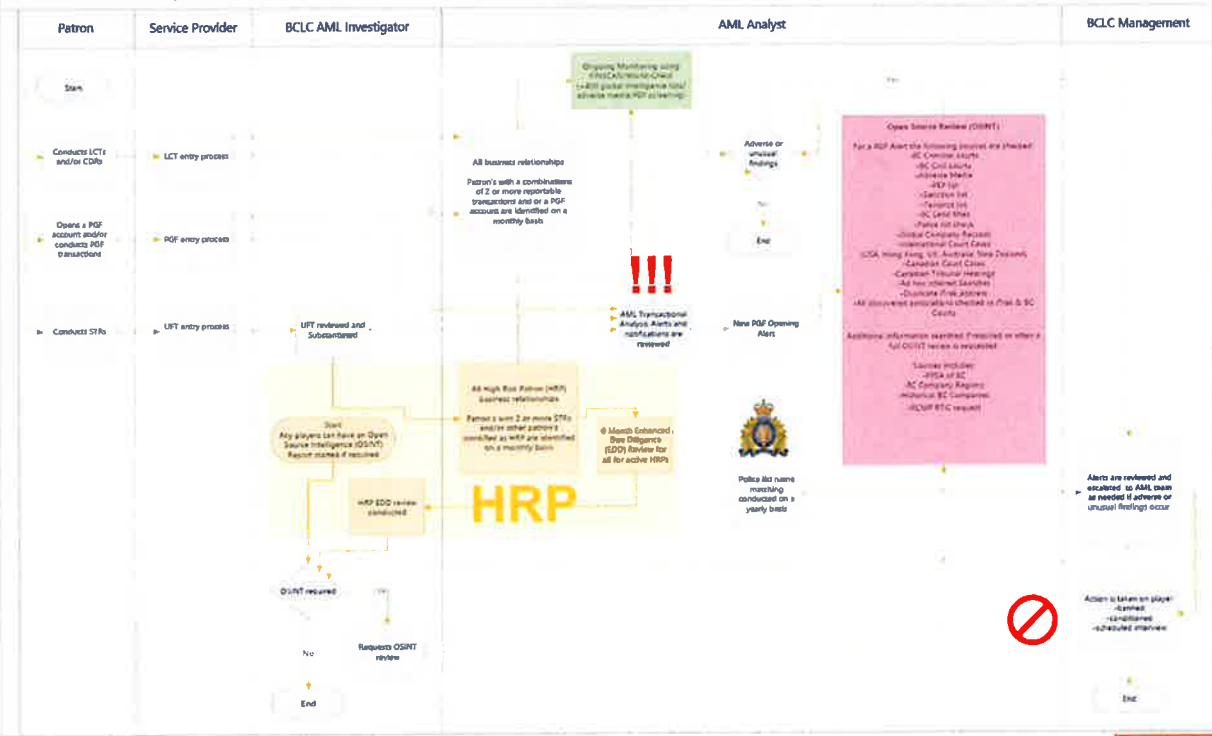
5856 cheques  
totalling \$85.2M



Due Diligence

AML Customer Due Diligence & Ongoing Monitoring (Land Based)

Updated: 10-Jan-2019



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## eGaming Deposits (Jul to Dec 2019)

**Total Deposit Count**

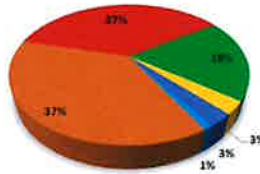


■ Credit Card ■ Debit ■ Interac Online ■ OBP ■ PayPal ■ WebCash

**Total Deposit Count**

Credit Card	333,617
Debit	749,117
Interac Online	285,371
OBP	40,530
PayPal	47,510
WebCash	45,071
<b>TOTAL</b>	<b>1,501,216</b>

**Total Deposit Volume**



■ Credit Card ■ Debit ■ Interac Online ■ OBP ■ PayPal ■ WebCash

**Total Deposit Volume**

Credit Card	\$ 40,882,918
Debit	\$ 40,559,893
Interac	\$ 20,967,510
OBP	\$ 3,068,935
PayPal	\$ 3,128,852
WebCash	\$ 1,140,260
<b>TOTAL</b>	<b>\$ 109,848,368</b>



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## eGaming Withdrawal Protocol

- All withdrawals totaling \$1,000 or more (within 24-hours) are reviewed for sufficient play
- All instances of suspected insufficient play (\$1,000+) are escalated to Investigations for review
- Bank verification received for all withdrawals totaling \$10,000 or more (within 24-hours)
- All withdrawals totaling \$10,000 or more (within 24-hours) reviewed by Investigations



## eGaming Deposit Protocol

- Online Bill Payment: Surname of bank account holder with PlayNow.com account holder are matched; mismatches are blocked and an explanation is required;
- PaySafe (payment processor) returns data associated to cards including "lost/stolen" flags that may exist;
- Visa cards are subject to Verified by Visa and Mastercards are subject to MasterCard Secure;
- PayPal offers a suite of fraud identification tools;
- Reporting within OpenBet back office for transactional monitoring.



# Discussion