

## Ankit Batra

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**From:** Rob Kroeker  
**Sent:** July-19-16 4:58 PM  
**To:** Ross Alderson  
**Subject:** RE: MNP Audit Investigations and AML response

Thanks Ross

**From:** Ross Alderson  
**Sent:** July-19-16 4:36 PM  
**To:** Rob Kroeker  
**Subject:** Fw: MNP Audit Investigations and AML response

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Rob, Dan has done more analysis and long story short it does appear that of most of the no occupation files there was an occupation submitted to FINTRAC and that there may have been an issue when Subject profiles were merged

Again string argument for working with source data

Ross Alderson  
Director, AML & Investigations

From my BlackBerry 10 smartphone on the TELUS network.

**From:** Dan H. Thompson **PERSONAL INFORMATION**  
**Sent:** Tuesday, July 19, 2016 3:55 PM  
**To:** Ross Alderson  
**Cc:** Daryl Tottenham  
**Subject:** RE: MNP Audit Investigations and AML response

Hello Ross,

I have isolated the FINTRAC batch files for all of the transactions where subjects were included in the MNP Report with Occupation=NULL.

I ran into a strange discrepancy that I needed to sort out with a few of the SIDs that I thought may add some clarity.

Using Subject ID 162258 as an example.

I have looked at a sampling of Disbursement and Buy-in batch files for this subject and was surprised to find that the batch files did actually contain an occupation, even though none was listed in iTrak. Further investigation revealed that this subject was merged (due to a duplicate iTrak record) after the batch filings took place. It appears that if the subject record that was chosen as the master record did not have an occupation, then the occupation in the merging record was not transposed.

The timeline for this subject is as follows:

- During the MNP (Not An) Audit Period this subject had 61 Reports filed to FINTRAC for LCT Buy Ins and Disbursements.

- The last FINTRAC Report for this subject from this period was FRN20140052060 and the batch file contains the SID: '99450', the occupation of 'GM Wood Company' and it was successfully processed with no errors by FINTRAC on 2014/07/01 @ 08:13:03
- On 2015/04/15 @ 10:24:19 SID 99450 was merged into SID 162258 by Cathy Cuglietta
- The Subject has no further LCTs after this date as they self-excluded as of 2014/8/24, expiring 2017
- I have attached the batch file in question, but transposed it into word format to highlight the pertinent sections. Formatting is mine, the contents are unchanged from when the record was originally filed.

I am investigating the other SIDs that were identified and though I haven't gotten as deep into their history as yet, it appears they also were merged in the past and had different SID's and occupations listed when the Batch files from this time period were filed with FINTRAC, but did not have the occupation transpose into the chosen master record after being merged. There also seems to be a trend that these subjects have not yet had further LCTs filed since these merges occurred, so our SP employees would not appear to have had any opportunity to gather occupation info to re-enter into the 'keeper' record.

The one exception is SID 59194 who has the occupation 'HouseWife' both in iTrak and the submitted FINTRAC Batch Files, She also no longer appears on the raw data output when I filter the results to occupation=null so I am assuming she was corrected at some point, or a typo was made in the SID.

Also of note, every single one of the 83 batch filings submitted for these subjects during the MNP Timeframe was accepted and processed with no errors by FINTRAC, with the exception of FRN20140020217 which was rejected with the China Postal code issue and subsequently corrected and re-filed.

I see that Mr Kroeker just responded with thanks to the team, so I hope this isn't too late to add some clarification.

TL:DR – We filed everything correctly with FINTRAC, then merged subjects when duplicate records were found afterwards, for these subjects occupations did not transpose to the new SID correctly, but further LCT were not generated, so there was nothing to prompt anyone to update the field in iTrak.

Didn't expect this email to get so long, please reach out if you need any clarifications

-Dan

Dan H Thompson  
Senior Technical Analyst, Gaming Solutions  
Software Services  
Business Technology, BCLC

BCLC, 74 West Seymour Street, Kamloops BC V2C 1E2

**PERSONAL INFORMATION**

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

## INFORMATION NOTE

**British Columbia Lottery Corporation**

**Date: October 13, 2016**

**Minister's Briefing  
Hon. Michael deJong**

### Item covered

### **MNP Review of Select Transactions at the River Rock Casino Resort**

#### **Key Facts:**

Meyers Norris Penny (MNP) LLP was engaged by the Gaming Policy and Enforcement Branch ("GPEB") on September 8, 2015 to undertake a review of select transaction processing at the River Rock Casino Resort (RRCR) and to provide a report. BCLC was not involved in the hiring of MNP or the setting of the terms of reference for the engagement.

The final report was submitted to GPEB on July 26, 2016. The report contained 14 summarized recommendations; 4 for GPEB and 10 for BCLC. There were a total of 84 more detailed observations.

MNP has qualified its report stating that: it was not an audit completed in accordance with any recognized audit standard, its work did not include any form of testing, and was based solely on observations and information provided to it, none of which MNP independently verified. They add that further analysis and supplemental information "may significantly alter our findings."

MNP further qualifies their report stating: "This report does not represent a comprehensive review of all aspects of the existing AML compliance processes. As such, we are not expressing an opinion regarding the adequacy, completeness or effectiveness of existing compliance activities".

The report was based on a review of select transactional data at RRCR for the period September 1, 2013 to August 31, 2015 as well as information obtained through 23 interviews and other observations made at the RRCR and at BCLC. No casino other than the RRCR was reviewed.

With respect to BCLC, MNP recommends that BCLC augment the Enhanced Due Diligence, Risk Assessment and Training components of its anti-money laundering regime to go beyond the Financial Transaction and Reports Analysis Centre of Canada (FinTRAC) guidelines and requirements as well as industry standards. Additionally, MNP recommends BCLC continue with the project underway to implement analytical software to enhance its ability to analyze and monitor customer transactions. MNP found that BCLC was in contravention of the *Proceeds of Crime (Money Laundering and Terrorist Financing Act)* (PCMLTFA) by having submitted 385 Large Cash Transaction Reports that failed to contain mandatory data and by reporting transactions that it did not need to report.

In regard to GPEB, MNP recommended that GPEB: should direct gaming service providers to refuse all cash transactions over a set threshold (but offered no advice on at which level the threshold should be set), should support BCLC's efforts to offer customers a greater range of

non-cash buy-in options, and, form a joint investigative unit with participation from GPEB, police, BCLC and Service Providers.

## **Background:**

GPEB is reviewing the MNP report and will develop a response plan in consultation with BCLC.

BCLC was provided a copy of the final MNP report on September 14, 2016. BCLC has developed initial management responses to the 10 recommendations addressed to it and has provided those responses to GPEB.

BCLC is required under the PCLMTFA to have a comprehensive independent audit conducted biannually on every aspect of its AML Program. Ernst & Young (EY), LLP was engaged by BCLC on August 11, 2015 to conduct the most recent biannual audit. EY's audit was conducted in accordance with recognized audit standards and covered the period of October 1, 2013 to July 31, 2015, which overlaps in part with the work conducted by MNP.

The EY audit included 5 lower mainland casinos, including RRCR, and involved interviews of 28 industry personnel. The EY Audit report was completed on November 23, 2015 and included no findings of non-compliance with federal AML legislation.

From June 6-10, 2016 FinTRAC conducted a comprehensive compliance examination of all aspects of BCLC's AML program. The objective of the examination was to assess whether BCLC's AML reporting, record keeping and client identification monitoring policies and practices met legislative requirements. Transactional data for the period of September 1, 2015 to February 29, 2016 was reviewed. Site visits and assessments were conducted at 3 lower mainland casinos (including RRCR) and 34 industry personnel were interviewed.

FinTRAC's July 2016 report out to BCLC stated that BCLC was in full compliance with federal AML legislation with one exception: BCLC's current training program for service providers required improvement as some service provider employees were not able to clearly articulate how money laundering risks in the industry directly related to their specific job functions.

During its exit interview with BCLC in June 2016, FinTRAC stated that BCLC's customer Enhanced Due Diligence was particularly robust and industry leading.

In conducting its work, MNP used a unique methodology whereby it required BCLC to produce and deliver to MNP a data extract from BCLC's databases for use in MNP's proprietary software system rather than work in the actual database as is the normal audit procedure. Producing this extract was technologically complex and took a number of weeks to complete.

MNP's conclusion that BCLC failed to properly submit 385 Large Cash Transactions to FinTRAC is based upon MNP's analysis of the data extract and not the actual reports submitted to FinTRAC. When BCLC was advised of purported reporting failures it conducted analysis comparing the MNP data extract to the production database and the reports actually submitted to FinTRAC. Through this process BCLC discovered that, for reasons unknown to it, it appears that not all data from the database copied into the MNP data extract. Accordingly, MNP's conclusion as to the accuracy of BCLC's reporting to FinTRAC is based on faulty data. BCLC has conducted a review and confirmed the reports submitted to FinTRAC were in compliance with the requirements. In addition, during its comprehensive review, FinTRAC found no instances where BCLC had failed to meet reporting requirements. Further, BCLC submits

reports to FinTRAC through an automated computer link. Reports missing mandatory data fields are flagged by the FinTRAC system and rejected until corrected.

MNP has recommended that GPEB impose a threshold above which service providers will be required to refuse all cash transactions.

More than 70% of all transactions at casinos in BC are conducted in cash. If GPEB were to impose a ban on cash transactions of \$10,000 or more, based on fiscal 15/16 financial results, casinos in BC could expect a decline of approximately \$427 million dollars in revenue annually.

Guidelines issued by the Financial Action Task Force (FATF), the international body responsible for anti-money laundering standards, are the foundation of Canada's anti-money laundering laws. Those international standards require anti-money laundering laws and programs to be risk based as opposed to prescriptive.

**Redacted by BC -  
Public Interest  
Immunity**

Responsible organization	Section	Recommendation	Response Plan	Status
GPEB	4.2	Should consider implementing a policy requirement that Service Providers refuse unsourced cash deposits exceeding an established dollar threshold or to refuse frequent unsourced cash deposits exceeding an established threshold and time period until the source of the cash can be determined and validated.	Redacted by BC - Public Interest Immunity	
	5.6	Define its accepted level of risk for unsourced cash and then develop clear roles and responsibilities for:  GPEB – Regulator, Enforcement  BCLC – Manage gaming and reporting entity  Service Provider – Risk Identification	As per 4.2 above GPEB to develop response.	
	5.35	At the direction of the Minister responsible for gaming, consider issuing a directive pertaining to the rejection of funds where the source of cash cannot be determined or verified at specific thresholds.	As per 4.2 above	
	5.52	Source of funds can only be verified by obtaining documentation for the withdrawal of cash from a financial institution or entity covered under the PCMLTFA.	As per 4.2 above. GPEB to develop response.	
	5.74	A directive from GPEB may also support BCLC in creating a policy which would mandate the Service Provider to decline a transaction when mandatory occupation data is no provided by the patron.	BCLC policy already exists directing Service Providers to stop and refuse transactions where a customer does not provide required identification.	
	4.3	The review of proposed cash alternative solutions, including credit, and the impact of these solutions should remain a priority for both GPEB and BCLC. Cash alternatives allow Service Providers to receive funds, strengthening the overall compliance regime with minimal impact on revenue generation.	BCLC has completed work on permitting international electronic funds transfers and delimiting return of funds cheques. These changes have been implemented. Work on an option that would allow Service Providers to offer credit has been wound down as Service Providers do not believe it is a workable payment option.	
	5.68			
BCLC	5.56	Depending on GPEB / Minister's risk tolerance for large unsourced cash transactions, revise policies regarding tolerance of high risk play and consequences of unacceptable high risk activity	BCLC will await GPEB's analysis of this recommendation.	On Hold
	4.8	Consider whether its risk assessment process adequately reflects current thinking around money laundering and terrorist financing risk. The risks associated to specific facilities should be evaluated, rather than simply drawing geographic boundaries for risk.	BCLC has reviewed its risk assessment. BCLC's risk assessment takes into account geographic risk elements. The risk assessment looks at both risk by region within the province and site specific risks within each region, including risks such as local crime rates in and around gaming sites. In June 2016 BCLC's risk assessment was the subject of an in-depth FinTRAC Compliance Review and was found to be fully in compliance with the PC(ML)TFA. Moreover, during the exit interview phase of the Compliance Review, FinTRAC indicated that BCLC's risk assessment was one of the most robust in the industry.	Complete
	5.48	Rather than base a facilities risk assessment by region, risk assessments should include factors specific to the facility. Consider if the risk register reflects the current environment as it is not as granular as other jurisdictions reviewed by MNP.	BCLC has reviewed its risk assessment. BCLC's risk assessment takes into account geographic risk elements. The risk assessment looks at both risk by region within the province and site specific risks within each region, including risks such as local crime rates in and around gaming sites. In June 2016 BCLC's risk assessment was the subject of an in-depth FinTRAC Compliance Review and was found to be fully in compliance with the PC(ML)TFA. Moreover, during the exit interview phase of the Compliance Review, FinTRAC indicated that BCLC's risk assessment was one of the most robust in the industry.	Complete
	5.49			
	5.7	Consider developing new cash alternative programs and products that include:	BCLC has been developing and introducing new cash alternative payment options since 2012. At the time of the MNP review two cash alternatives sat with GPEB for approval. GPEB have since stated their approval is not required as these are operational gaming matters falling outside of their mandate. The two new cash alternative payment options have now been implemented.	Complete
		The ability of non-Canadian players to fund PGF accounts and repay credit if subject to cash restrictions in their home country (i.e. China), and	International EFT and wire transfers were in the process of development prior to the time of this review. That work is complete and international EFTs have been implemented. Initial assessments of credit offering do not support the offering of this option in the near term.	Complete
		allocating how defaults on repayment will be determined (i.e. between BCLC and service provider.	Credit has been evaluated and is presently not approved by GPEB and thus is not currently proposed by BCLC in the short term	Complete

Responsible organization	Section	Recommendation	Response Plan	Status
BCLC	4.5	If GPEB Implements a policy regarding the refusal of large or frequent unsourced cash deposits, BCLC's procedures to address the policy should include refresher training to Service Providers pertaining to BCLC's reporting requirements of attempted transactions to ensure reports are appropriately identified.	Redacted by BC - Public Interest Immunity	On Hold
	4.11 5.47	Facility staff should be regularly trained on the completion of the forms used for reporting, including UFT reporting.	Servie Provider staff receive intial AML training prior to commencing duties and also recieve periodic refresher training. In June 2016 FINTRAC completed a comprehensive review of BCLC UFT and STR reporting processes including that of RRCR and found BCLC to be fully compliant with PCMLTFA. UFT is an internal industry reporting process for SP's to report transactions to BCLC for review.	Complete
	4.12	Anti-money laundering training programs should be evaluated for up-to-date content and effectiveness.	BCLC reviews and updates its AML training on a periodic basis and whenever requirements under the PC(ML)TFA are amended. In June 2016 FINTRAC completed a comprehensive review of BCLC's AML regime. BCLC has undertaken a full review, taking into account guidance from FINTRAC. Enhancements to BCLC's AML training program will be in place in 2017.	Complete
	4.12 5.55	Training should be provided in the primary language of the candidate, particularly for its high risk exposed employees (those working in high-limit rooms).	BCLC has reviewed this recommendation. Federal Anti-money laundering laws and FinTRAC Guidance and directives are provided only in Canada's official languages: French and English. Compliance reviews and audits conducted by FinTRAC in B.C. are conducted in English only. Nationally recognized accounting firms, which reporting entitles under the PC(ML)TFA reply upon to conduct statutorily mandated biennial independent compliance reviews, offer services only in English or French. Prescribed reporting to FinTRAC under the PC(ML)TFA and under the Criminal Code may only be conducted in English or French. For security related reasons casino operations and all transactions and communications between gaming staff and customers are required to be conducted in English only in BC casinos. BCLC's service providers employee more than 5000 staff reflecting a broad range of nationalities and languages other then English or French. Conducting AML training in myriad languages that are not used in either casino operations or AML compliance audits and reviews would introduce a substantial risk of confusing and misunderstood communications potentially leading to compliance gaps and errors. Given the risk of reporting errors and other compliance gaps implementing this recommendation could introduce, BCLC will not pursue the recommendation further.	Complete
	4.14	The KYP framework at RRCR is a task-driven compliance activity rather than a risk management activity. Provide further guidance as the manager and responsible entity for AML regulatory obligations to enhance and enforce appropriate KYP measures.	BCLC has reviewed its customer due diligence process in light of this recommendation, the requirements under the PC(ML)TFA and FinTRAC Guidance on KYC requirements. In addition, BCLC has consulted with other casinos and reporting entites on appropriate KYC measures. BCLC's CDD and KYC measures meet all requirements. In addition, in June 2016 FinTRAC conducted a comprehensive review of BCLC's entire AML program. The FinTRAC review involved site visits to RRCR and a number of RRCR staff interviews to test its CDD and KYC processes. FinTRAC found BCLC's program to be fully compliant.	Complete
	5.54	Additional training for employees in the VIP area focused specifically on suspicious indicators and required actions to improve independent thinking.	BCLC reviews and updates its AML training on a periodic basis and whenever requirements under the PC(ML)TFA are amended. In June 2016 FINTRAC completed a comprehensive review of BCLC's AML regime. BCLC has undertaken a full review, taking into account guidance from FINTRAC. Enhancements to BCLC's AML training program will be in place in 2017.	Complete
BCLC	4.7	Enhance the CDD processes from both a risk management and revenue generation perspective with modifications and additional resources to meet EDD expectations for high risk patrons.	BCLC has reviewed its customer due diligence process in light of this recommendation, the requirements under the PC(ML)TFA and FinTRAC Guidance on KYC requirements. In addition, BCLC has consulted with other casinos and reporting entites on appropriate KYC measures. BCLC's CDD and KYC measures meet all requirements. In addition, in June 2016 FinTRAC conducted a comprehensive review of BCLC's entire AML program. The FinTRAC review involved site visits to RRCR and a number of RRCR staff interviews to test its CDD and KYC processes. FinTRAC found BCLC's program to be fully compliant.	Complete
	4.9 5.83	Review its EDD process to ensure the data collected and information gleaned provides a clear picture of the risks and profile of the patron for risk assessment and mitigation.	BCLC has reviewed its customer due diligence process in light of this recommendation, the requirements under the PC(ML)TFA and FinTRAC Guidance on KYC requirements. In addition, BCLC has consulted with other casinos and reporting entites on appropriate KYC measures. BCLC's CDD and KYC measures meet all requirements. In addition, in June 2016 FinTRAC conducted a comprehensive review of BCLC's entire AML program. The FinTRAC review involved site visits to RRCR and a number of RRCR staff interviews to test its CDD and KYC processes. FinTRAC found BCLC's program to be fully compliant.	Complete
	5.15	EDD measures could be more qualitative, and a formal response to specified risk ratings could be created.	BCLC has reviewed its customer due diligence process in light of this recommendation, the requirements under the PC(ML)TFA and FinTRAC Guidance on KYC requirements. In addition, BCLC has consulted with other casinos and reporting entites on appropriate KYC measures. BCLC's CDD and KYC measures meet all requirements. In addition, in June 2016 FinTRAC conducted a comprehensive review of BCLC's entire AML program. The FinTRAC review involved site visits to RRCR and a number of RRCR staff interviews to test its CDD and KYC processes. FinTRAC found BCLC's program to be fully compliant.	Complete
	5.16	Outsourcing the EDD process for higher risk patrons should be considered to clear the current backlog.	Any backlog observed by this review was a temporary circumstance arising from an underreporting issue discovered by BCLC at the River Rock facility October 2015. Additional BCLC staff were reassigned to assist the AML unit with the under reporting issue so that normal transaction monitoring could continue to be carried out while the underreporting issue was addressed contemporaneously. The reviewer was made aware of these circumstances at the time of its work. Any backlog that may have been observed was transitory in nature. Moreover, the outsourcing of core AML processes would unnecessarily introduce a higher level of risk into the AML program and increase the chance of error resulting in non-compliance.	Complete
	4.1 5.24 5.28 5.29	Prioritize and appropriately resource the ongoing SAS implementation project (schedule for roll out in fall of 2016) to improve the quality of the data used for ongoing risk assessment and compliance monitoring and reporting.	BCLC continues with the process to automate aspects of its AML program to provide greater efficiency and enhanced transaction monitoring capabilities. BCLC pursues a "continuous improvement" philosophy with respect to its AML program and continually seeks to improve and enhance its efforts and performance.	Complete

Responsible organization	Section	Recommendation	Response Plan	Status
BCLC	4.11	Ensure that reporting forms used by the facilities are up to date and include valuable information fields for mandatory completion for unsourced or high volume cash transactions such as source of funds, source of wealth and purpose and intended nature of relationship information.	BCLC reviewed its forms in light of this recommendation. In June FinTRAC conducted a comprehensive review of BCLC's entire AML program and found no issues with transaction reporting or record keeping requirements.	Complete
	4.13	MNP identified instances where non-cash transactions processed to RRRC's PGFs were over-reported to FINTRAC, and instances where mandatory fields in LCTRs were left blank. Both issues are contrary to the PCMLTFA and require remediation and disclosure to FINTRAC.	It is BCLC's understanding that it is not possible to successfully submit an LCT into the BCLC - FinTRAC linked systems with a designated mandatory field left blank. Such a report would be rejected by the FinTRAC system and flagged for immediate follow-up and remediation. BCLC suspects that this anomalous finding may be related to the reviewer's unique methodology where it worked in a select data extraction from BCLC's database rather than the actual production database. This a process that has never been attempted before and deviates from standard audit practice where auditors work directly in the production database which removes the risk of these types of errors. BCLC has reviewed the data extraction as a result of this finding and compared it to the production data. It appears that during the extraction process some data fields did not populate into the extraction sample in some limited instances. In other words BCLC, when working directly in the production data as opposed to a select extraction of the data, cannot find the LCT errors referred to here. BCLC suggested the reviewer re-run their analysis in the production database or provide the suspect reports to FinTRAC directly for verification that mandatory fields were completed as required when the form was submitted. The reviewer declined the opportunity to take either of these steps and correct what appear to erroneous findings. Upon reviewing the actual production data BCLC is confident the exceptions reported here did not in fact occur.	Complete
	5.27	Due diligence on large volumes of slot Cash Disbursement Reports (CDR) should be monitored for suspicious activity.	BCLC implemented processes in 2016 to review slot play based on CDR levels and it is currently built into the AML program. This is on top of current due diligence practices which FinTRAC found to be compliant in June 2016.	Complete
	5.36 5.32	Review all of the FINTRAC reporting (LCTR/CDR) for non-cash for all facilities which offer PGF accounts should be done immediately to stop unnecessary and incorrect reports.	As per 4.13 BCLC identified the PGF issue in Nov 2016 and engaged FinTRAC for guidance as this reporting practice had been in place since 2012. On written confirmation from FinTRAC BCLC ceased this practice in July 2016. BCLC have requested guidance from FinTRAC on all new Cash alternatives and reporting obligations.	Complete
	5.44	Create a template for Unusual Financial Transaction (UFT) reports for service providers to use to ensure that all required information is included and to create consistency in the quality of submissions between facilities.	BCLC has reviewed its UFT process in the context of this recommendation. BCLC requires immediate email notification from service providers of a UFT for timeliness. Any specific detail pertaining to the transaction are reported through the ITRAK database for consistency, completeness, security and protection of privacy requirements. Implementing a stand alone form outside of the existing database will introduce risk of reports or data being missed and a privacy breach risk that do not currently exist.	Complete
Service Providers	5.4	VIP Hosts have the most significant interaction and knowledge of the VIPs and ability to flag instances of receipt and use of unsourced cash for suspicious transaction reporting. Consideration should be given to cross functional reporting lines to the Director, Table Games for a consistent approach to compliance across all table game points of access susceptible to the acceptance of unsourced cash.	BCLC has reviewed this recommendation. VIP hosts and all Table Game staff must complete anti-money laundering training which includes training related to large cash transaction handling and the duty to report in regard to these transactions. Additionally, Surveillance live monitors all large cash transactions irrespective of the staff involved in the transaction be they VIP hosts, Table Games staff, Cage staff or any other employee. FINTRAC reviewed BCLC's AML program in June 2016 including that of RRRC and found BCLC to be compliant with PCMLTFA with no evidence of non reporting transactions since the under-reporting issue was identified by BCLC in November 2016.	Complete
	5.46	Floor staff should have more active involvement in the UFT reporting process. UFT reporting is currently carried out by surveillance staff who only have limited info based on video surveillance.	BCLC has reviewed its UFT reporting process in the context of this recommendation. There appears to be some misapprehension expressed in the review in regard to BCLC's UFT reporting process. All floor staff receive mandatory AML training and have a positive duty to bring forward and report any unusual financial transactions, irrespective of their specific role. Further, Surveillance is not restricted to information based solely on video surveillance. Surveillance operators are at all times in direct communication with floor staff via two way radio. FINTRAC conducted a comprehensive review of BCLC's AML program in June 2016 including that of RRRC and found BCLC to be fully compliant with all aspects of the PCMLTFA related to transaction reporting and record keeping.	Complete
GPEB	5.19	Establish a dedicated, cooperative inter-agency AML investigations unit comprised of GPEB and BCLC investigators to delineate the roles between operational and AML investigations and regulatory compliance investigations.	GPEB on lead for response.	
BCLC	5.1	Operating levels for BCLC investigators may need to be reviewed as the current staffing levels assigned to RRRC do not appear to be sufficient	Any backlog or workload issues observed during this review were a temporary circumstance arising from an underreporting issue discovered by BCLC at the River Rock facility October 2015. Additional BCLC staff were reassigned to assist the AML unit with the underreporting issue so that normal transaction monitoring could continue to be carried out while the underreporting issue was addressed contemporaneously. The reviewer was made aware of these circumstances at the time of its work. BCLC closely monitors work demands on AML investigators on a weekly basis. Workloads remain manageable and no similar backlogs have developed since the one in November - December 2016.	Complete
All	4.4	Jointly evaluate the resourcing and functioning of existing investigative units. Effective multi-agency units would promote the sharing of information and resources.	BCLC and GEB executive have worked through roles and responsibilities. The GCA allows sharing of information in appropriate circumstances between GPEB and BCLC. Since the MNP review JIGIT was created as the primary agency to investigate ML and POC related activity. BCLC has MOU with JIGIT allowing for effective and efficient information flows and coordination. GPEB has investigators assigned to JIGIT.	Complete