

Van Sleuwen, Terri HSD:EX

From: McCrea, Bill J HSD:EX
Sent: July 8, 2009 4:27 PM
To: Saville, Rick HSD:EX; Vander Graaf, Larry P HSD:EX; Van Sleuwen, Terri HSD:EX
Cc: Sturko, Derek HSD:EX
Subject: BCLC Money Management Material
Attachments: Word version AML Process Charts v 1.31.doc; GPE proposals FINTRAC and BCLC practice.doc

Good Afternoon,

Derek and I had a conference call with BCLC (Michael Graydon, Terry Towns, Jacquetta Goy, Darryl Schiewe & Doug Morrison) this afternoon to review their progress toward understanding risks and controls around large and suspicious cash transactions. This is related to the ongoing discussions concerning casino Patron Gaming Fund accounts. The attached two files provide work done by BCLC since our last discussion in April. The first document contains process charts of BCLC's money management system. It includes their identified risk areas and actions to deal with those. The second document develops a comparison of GPEB's discussion on large and suspicious money transactions with the FINTRAC requirements and BCLC's commentary.

Please review this material and I will set up a video conference next week to discuss your thoughts on the progress. Rick, as you will be out of the office would you please provide me with your comments before you go. If you have any questions please let me know. Thank you for your continuing help.

Bill

Bill McCrea BES MBA FCIP
 Executive Director Internal Compliance and Risk Management
 Gaming Policy and Enforcement Branch
 Phone: [REDACTED]
 Mobile: [REDACTED]
 Fax: [REDACTED]

From: Terry Towns [mailto:[REDACTED]]
Sent: July 8, 2009 11:27 AM
To: Sturko, Derek HSD:EX
Cc: McCrea, Bill J HSD:EX; XT:Graydon, Micheal CAsE:IN
Subject: Material for 2 pm Teleconference Today

Derek, please find attached a response document to your Money Laundering Risk Management document. Also attached are process maps outlining the process for PGF (Player Gaming Fund) accounts and our current process around the implementation of the FINTRAC reporting requirements.

We are attempting to find a workable process in regards to Player Gaming Fund accounts that will:

- Comply with FINTRAC requirements.
- Identify any individuals who open those accounts.
- Identify and report suspicious transactions to FINTRAC, the Policy and GPE.

There are a number of layers of controls in place which we are and will continue to modify and refine.

Thanks for meeting with us and I am hopeful we can come up with a workable solution.

Terry

Terry Towns
 Vice President
 Corporate Security & Compliance, BCLC

09/07/2009