

Message

From: Peter Demonte [REDACTED]
Sent: 2015-11-02 11:26:23 PM
To: Patrick Ennis [REDACTED]
Subject: RE: River Rock - Four Items Noted - Topic Tracking Sheets & LCT issues.
Attachments: image001.jpg

Hello Pat,

This comment concerns me:

"I cannot imagine why neither of the cash buy-ins did not result in a UFT file being created and I am looking to find out how this could occur so we know where to start to fix it".

As you know and apparently Jim HUSLER does as well. Neither of these transactions met the threshold that we have apparently been using for years? Now all of a sudden this is a reportable UFT?

HUSLER has informed me that TOTTENHAM wants UFT's for both of these incidents?

I have two questions:

- 1) Should I open a UFT for these Incidents that were not within the threshold?
- 2) What are the thresholds going forward?

I would like to discuss when you have a chance.

Thank you,

Peter Demonte | Surveillance Manager

T: [REDACTED]
E: [REDACTED]



From: Patrick Ennis
Sent: Monday, November 02, 2015 2:41 PM
To: Peter Demonte
Subject: FW: River Rock - Four Items Noted - Topic Tracking Sheets & LCT issues.

From: Daryl Tottenham [mailto: [REDACTED]]
Sent: Monday, November 02, 2015 2:34 PM
To: Patrick Ennis
Subject: FW: River Rock - Four Items Noted - Topic Tracking Sheets & LCT issues.

Hi Pat,

This morning we were looking into an entry on the RR daily cash/pgf sheet as there was an entry for a 450K cash buy-in with no particulars and no Itrak report. As it turned out, there was no actual cash buy-in for that amount as the entry was made to document an abandoned chip file and was the sum of 2 entries and labeled as cash. While I was dealing with Jim on it we started finding some other issues and Jim continued pulling documents trying to track the chip movements. As you can see, when he was finished there were several other issues found that resulted when he started looking in depth at the LCT's created over the past 2 days.

I cannot imagine why neither of the cash buy-ins did not result in a UFT file being created and I am looking to find out how this could occur so we know where to start to fix it. The other 2 issues revolve around the proper documentation of chip and PGF movements that need to be addressed as we have seen a number of similar issues in the recent past.

Could you please take a look at these issues and let me know what your findings are when finished? In the culture that we are currently working within, we expect close scrutiny from our Provincial and Federal Regulators and would not be able to defend files being missed like this unless they were a one-off rarity.

I am on cell if you need to chat further today but will be on a conference call for the next hour.

Thanks

Daryl

Daryl Tottenham Ba, CAMS

AML Specialist

AML & Operational Analytics Unit

Corporate Security & Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC V5M 0A6
[REDACTED]

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

From: Jim Husler
Sent: Monday, November 02, 2015 1:09 PM
To: Daryl Tottenham
Cc: Bruno Gatto; Kris Gade; Steve Beeksma; Jerome Wakeland; Tom Caverly
Subject: River Rock - Four Items Noted - Topic Tracking Sheets & LCT issues.

Hello Daryl,

A few items discovered:

1) After reviewing the Cage-Cashier Drop Buy in Tracking Sheets, it was discovered that patron [REDACTED] SID#88040 had a \$50,000.00 cash buy in which consisted of: 2000x\$20.00 & 100x\$100.00 - **NO UFT Created!**

LCT20150050412

Resolution: I will speak with the Surveillance Manager and have a UFT created.

2) After reviewing the Cage-Cashier Drop Buy in Tracking Sheets, it was discovered that [REDACTED] SID#49980 had a \$200,000.00 cash buy in which consisted of: 4000x\$20.00 - **NO UFT Created!**

LCT20150051224

Resolution: I will speak with the Surveillance Manager and have a UFT created.

3) In connection to point#2 - IN20150056582 for Abandoned Chips valued at \$300,000.00 that was put into GMS then taken out. **This chip movement (\$300k) was not documented as a disbursement/buy in on an LCT!**

LCT20150051224 - Has been opened so the adjustments can be made by the AML Department.

Notes: IN20150056582 - Supplemental number four - says the chips were sent to MDB26.

Update: **BCLC Corp Discussions are ongoing....**

4) After reviewing the Cage-Cashier Drop Buy in Tracking Sheets, it was discovered that Patron [REDACTED] SID#49980 had a \$450,000.00 cash buy in which consisted of: 4500x\$100.00.

Resolution: After speaking with the Count Team Supervisor and Cage Shift Manager it was determined that the \$450,000.00 **was not `CASH` but it was really Abandoned Chips.**

The Cage Manager is away until Wednesday and it would be nice if the correct method was added on the tracking sheet.

Note: IN20150056859 – Chips were given back to [REDACTED] at MDB16 - ``Used as a buy-in``.

Thanks,

Jim HUSLER

BCLC Investigator

Corporate Security and Compliance

BCLC 2940 Virtual Way, Vancouver BC V5M 0A6

[REDACTED]
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