

This is the 1st affidavit of
Terrance Doyle in this case
and was made on February 2, 2021

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

The Honourable Mr. Austin F. Cullen, Commissioner

Affidavit #1 of Terrance Doyle

I, **Terrance Doyle**, Interim Chief Executive Officer, of Great Canadian Gaming Corporation ("**Great Canadian**"), c/o 95 Schooner Street, Coquitlam, BC V3K 7A8, SWEAR THAT:

1. As the Interim Chief Executive Officer of Great Canadian, I have personal knowledge of the facts and matters hereinafter deposed to, save and except where the same are stated to be made upon information and belief and where so stated I verily believe the same to be true.

Overview of Great Canadian

2. Great Canadian is a British Columbia corporation with operating subsidiaries in British Columbia, Ontario, Nova Scotia, and New Brunswick. Great Canadian was founded in 1982 in British Columbia and was the first gaming facility operator in British Columbia. It is today the largest gaming service provider in Canada and operates 26 gaming, entertainment and hospitality facilities in British Columbia, Ontario, New Brunswick, and Nova Scotia.

3. In British Columbia, Great Canadian operates ten gaming facilities through its subsidiaries, Great Canadian Casinos Inc., Hastings Entertainment Inc., Orangeville Raceway Limited, Great Canadian Entertainment Centres Ltd., and Chilliwack Gaming Ltd.:

- (a) River Rock Casino Resort ("**River Rock**") (Great Canadian Casinos Inc.);
- (b) Hard Rock Casino Vancouver (Great Canadian Casinos Inc.);
- (c) Hastings Racecourse & Casino (Hastings Entertainment Inc.);

- (d) Chances Maple Ridge (Great Canadian Entertainment Centres Ltd.);
- (e) Chances Chilliwack (Chilliwack Gaming Ltd.);
- (f) Chances Dawson Creek (Great Canadian Entertainment Centres Ltd.);
- (g) Elements Casino Surrey, which includes the Fraser Downs racetrack (Orangeville Raceway Limited);
- (h) Elements Casino Victoria (Great Canadian Casinos Inc.);
- (i) Casino Nanaimo (Great Canadian Casinos Inc.); and
- (j) Bingo Esquimalt (Great Canadian Casinos Inc.).

4. As a result of the COVID-19 pandemic and directives issued by British Columbia's Attorney General and Public Health Officer, all operations at Great Canadian's gaming facilities in British Columbia have been suspended since March 16, 2020. I do not know when Great Canadian will be permitted to resume its gaming operations in British Columbia.

5. Great Canadian is currently engaged in a corporate transaction pursuant to which the shares of Great Canadian are being acquired through a statutory plan of arrangement under the British Columbia *Business Corporations Act* by an affiliate of funds managed by affiliates of Apollo Global Management, Inc. ("Apollo"). Apollo is a leading global alternative investment manager. Shareholders of Great Canadian have voted to approve the arrangement and court approval of the arrangement was granted by the Supreme Court of British Columbia in late December 2020. Assuming that the conditions to closing are satisfied and necessary regulatory approvals are obtained, it is anticipated that the acquisition will be completed in the second quarter of 2021. Following the completion of the acquisition, it is expected that Great Canadian's shares will no longer trade on the Toronto Stock Exchange.

My Roles with Great Canadian

6. I have been employed by Great Canadian for over 20 years. As I have worked my way up through Great Canadian, I have worked in nearly every area of the business.

7. Early in my tenure with Great Canadian, my roles focused on construction and development, including the development of new casinos.

8. Over the last ten years, I have worked closely with Great Canadian's Board of Directors and the former President and Chief Executive Officer, Rod Baker. Due to my experience in the industry, the Board of Directors felt it was important to have a viable succession plan and urged me to play an active role in working and understanding all areas of the business at an appropriate level starting in 2015 when I was appointed as Chief Operating Officer.

9. In March 2019, I was promoted from Chief Operating Officer to President, Strategic Growth and Chief Compliance Officer. In this role, I reported directly to Great Canadian's Board of Directors as well as having an ongoing reporting relationship to Great Canadian's President and Chief Executive Officer on long term strategic initiatives.

10. On January 24, 2021, I was appointed by Great Canadian's Board of Directors to the position of Interim Chief Executive Officer following Mr. Baker's resignation. Great Canadian has appointed Sukvinder Singh as my replacement in the role of Chief Compliance Officer. Mr. Singh most recently occupied the role of Executive Vice President, Compliance for Great Canadian and previously held senior roles at the Alcohol and Gaming Commission of Ontario.

11. In the roles that I have occupied over the last ten years, my job was to run the business of Great Canadian and work with the leadership of the Crown corporations in each jurisdiction where Great Canadian operates. In British Columbia, this is the British Columbia Lottery Corporation ("BCLC").

12. Generally speaking, my role with Great Canadian since 2015 has been to act as the most senior executive providing leadership to the Great Canadian executive team members. Great Canadian's Board of Directors, as well as its former President and Chief Executive Officer Mr. Baker, were clear that my responsibility was to ensure a high level of engagement and focus on compliance in all areas of the business. This contrasts with the role of Mr. Baker, who was focused on providing high level strategy, capital structure, and setting the tone from the top regarding compliance. The message that I have consistently received from the Board of Directors and Mr. Baker was to always run Great Canadian's business in a compliant and appropriate manner. They

have always directed me to hire the most qualified people and to make effective compliance a priority for the company.

Regulation of Great Canadian

13. As explained above, until the anticipated closing of its transaction with Apollo, Great Canadian is a publicly-traded company trading on the Toronto Stock Exchange. Great Canadian is therefore required to comply with all of the requirements of the Toronto Stock Exchange and the provincial securities commissions.

14. Great Canadian is also licensed to provide casino operational services in Ontario, Nova Scotia, and New Brunswick, which means it complies with regulators in those provinces as well.

15. BCLC conducts and manages gaming in British Columbia. It enters into contracts with service providers, such as Great Canadian, who provide operational services for each gaming facility. These contractual agreements are entered into by Great Canadian for each gaming facility and are colloquially referred to as "Operational Services Agreements" ("OSAs").

16. The OSAs require Great Canadian to abide by all policies and directives of BCLC. The OSAs and BCLC's standards, policies, and procedures are detailed and prescriptive in what Great Canadian must do as a service provider, including with respect to AML compliance and reporting. BCLC regularly audits Great Canadian and also hires third party experts to conduct comprehensive audits.

Reporting by Great Canadian

17. BCLC is the designated reporting entity to FINTRAC. Great Canadian participates in BCLC's reporting to FINTRAC by identifying and reporting both Large Cash Transactions ("LCTs") and Unusual Financial Transactions ("UFTs") to BCLC. Great Canadian is also required to prepare Foreign Exchange Reports (for the exchange of foreign currency of \$3,000 CDN equivalent or more) and Casino Disbursement Reports (for cash outs or jackpots of \$10,000 or more). These reports are completed in a similar manner as described for LCT Reports below.

18. Great Canadian employees report both LCTs and UFTs to BCLC using BCLC's iTRAK system. In the iTRAK system, each type of report is entered by Great Canadian employees into its own module. BCLC has access to all LCT Reports and all UFT Reports filed by Great Canadian (and all other service providers in British Columbia) through BCLC's iTRAK system.

19. An LCT Report is completed by Great Canadian whenever Great Canadian receives an amount of \$10,000 or more in cash in the course of a single transaction, or whenever there are a series of transactions totaling \$10,000 or more in cash over a 24-hour period. One of the requirements for completing an LCT Report is that a patron is required to provide government issued identification and various personal details, all of which are reported to BCLC (and in turn, FINTRAC) as part of the LCT Report. If the patron does not provide all of the necessary information, Great Canadian refuses the buy-in transaction. For LCT Reports, Great Canadian's cage personnel enter transactions into the FINTRAC entry screen in the FINTRAC module of BCLC's iTRAK system. The iTRAK system then creates records for forwarding to FINTRAC by BCLC.

20. A UFT Report is completed by Great Canadian whenever there are reasonable grounds for Great Canadian to suspect that a transaction could be related to a money laundering or terrorist activity financing offence. In completing these reports, Great Canadian employees use indicators published by BCLC in its standards, policies and procedures, in conjunction with FINTRAC's guidelines, in determining whether a transaction should be reported as a UFT to BCLC. Surveillance personnel employed by Great Canadian are typically responsible for creating UFT Reports. These reports are entered into the Incident Report module of BCLC's iTRAK system. Each time a UFT Report is created in the iTRAK system and saved by a Great Canadian employee, an alert notification is automatically generated and directed to BCLC investigators.

21. A UFT Report created by Great Canadian may or may not be reported by BCLC to FINTRAC as a Suspicious Transaction Report ("STR"). After a UFT Report is entered into the iTRAK system by Great Canadian, it is reviewed by BCLC investigators. BCLC has access to more comprehensive intelligence than Great Canadian does about the subject matter of many UFTs. This may include related information reported by other casinos, which Great Canadian is not privy to. I understand that since 2014, BCLC has also had an information sharing agreement

with police. BCLC reviews all available information and determines whether to file an STR with FINTRAC.

22. Great Canadian further reports directly to the Gaming Policy Enforcement Branch ("GPEB") all unusual financial transactions via Section 86 Reports, referencing section 86 of the *Gaming Control Act*. Section 86 Reports include, but are not limited to, the information in every UFT Report filed by Great Canadian with BCLC.

23. In preparing for my testimony at this inquiry, I have reviewed a summary of reporting done by Great Canadian to BCLC and GPEB for all of its British Columbia gaming facilities between the years of 2010 and 2019. I am advised by Great Canadian's Director of Compliance, Peter Demonte, and verily believe that Great Canadian filed the following number of reports with BCLC and GPEB, respectively, for the years indicated:

All Sites	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	TOTAL
LCT Reports	19,951	21,375	22,772	24,800	29,143	32,723	35,518	40,173	30,624	27,828	284,907
UFT Reports	405	595	763	885	1607	1734	2254	1423	1339	1319	12,324
S. 86 Reports	2439	4273	5963	7058	7944	7170	4234	3619	4648	6213	53,561

24. The above chart reflects reporting done at all Great Canadian sites in British Columbia. I have also reviewed the reporting done by Great Canadian to BCLC and GPEB for only the River Rock between the years of 2010 and 2019. River Rock is Great Canadian's largest gaming facility in British Columbia. I am advised by Great Canadian's Director of Compliance, Peter Demonte, and verily believe that Great Canadian filed the following number of reports related to only the River Rock with BCLC and GPEB, respectively, for the years indicated:

River Rock	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	TOTAL
LCT Reports	11,480	13,119	15,009	17,137	20,668	22,594	22,952	25,163	19,059	16,113	183,294
UFT Reports	167	328	646	818	1493	1637	2018	1204	1017	1024	10,352
S. 86 Reports	980	1907	3066	3986	4698	4467	2986	2382	2865	3369	30,706

25. In addition to the formal reporting that Great Canadian provides to BCLC, BCLC has investigators on-site at each of Great Canadian's properties. Their hours on duty have varied over time and they are different at each property. Great Canadian provides offices for the exclusive use of BCLC's investigators, which BCLC investigators use to facilitate and monitor compliance by Great Canadian with AML reporting requirements.

26. The on-site BCLC investigators have access to, and are provided with, any additional paperwork or information that they request regarding buy-ins at Great Canadian's properties. Great Canadian's cage personnel prepare various reports regarding cash used to buy-in at the cage. These include Cashier Drop Buy-in Sheets, Cashier Master Cash-out Logs, and Large Cash Transaction Tracking logs. This paperwork details all cash transactions completed at the cage, including the denominations used by patrons for large cash buy-ins.

Cooperation with Law Enforcement

27. Throughout my entire time with Great Canadian, it has been my experience that Great Canadian has always sought to cooperate with law enforcement in all jurisdictions in which it operates and has proactively brought potentially unlawful activities to the attention of police.

28. Attached and marked as **Exhibit "A"** [GCGC_PROD_0074388] is a certificate of appreciation awarded in 2012 by the Officer in Charge of the Richmond RCMP Detachment to River Rock's surveillance team.

29. Attached and marked as **Exhibit "B"** [GCGC_PROD_0074388] is a second certificate of appreciation given to the surveillance team at the River Rock by the Richmond RCMP.

30. Attached and marked as **Exhibit "C"** [GCGC_PROD_0046540] is an email received by Robert Kroeker (who was then the VP of Corporate Security and Compliance at Great Canadian) in April 2014, and forwarded internally within Great Canadian, where the Richmond RCMP advises in response to certain media reports that they do not have a concern about money laundering at the River Rock and that they are very comfortable with the River Rock's ability not to facilitate money laundering.

Great Canadian Patrons

31. Over the course of the public inquiry to date, I have been made aware that the conduct of a number of Great Canadian patrons has been discussed in evidence. I am advised by Great Canadian's Director of Compliance, Peter Demonte, that he reviewed Great Canadian's records within BCLC's iTRAK system relating to these patrons and provided me with the following additional information:

a. Bellwood, Chadwick Sydney Martin	Great Canadian filed 4 UFT Reports with respect to this patron in May and June 2014. This patron was barred by BCLC in April 2016 and May 2016 (five years).
b. Cao, Binshun	This patron was the subject of 92 LCT Reports between September 2005 and October 2015. Great Canadian has filed 9 UFT Reports with respect to this patron. This patron was placed on sourced cash and chip conditions in September 2015. This patron was categorized by BCLC as a high risk patron.
c. [REDACTED]	This patron was the subject of 534 LCT Reports between September 2005 and March 2020. Great Canadian has filed 45 UFT Reports with respect to this patron. This patron has been on cash and chip conditions since 2016 and her gaming privileges were suspended by BCLC for one month in 2019. This patron was categorized by BCLC as a high risk patron.
d. [REDACTED]	This patron was the subject of 132 LCT Reports between June 2011 and July 2019. Great Canadian has filed 24 UFT Reports with respect to this patron. This patron was categorized by BCLC as a high risk patron.
e. Gao, Jia	This patron was the subject of 159 LCT Reports between August 2013 and February 2016. Great Canadian has filed 28 UFT Reports with respect to this patron.

	<p>This patron was the placed on sourced cash and chip conditions in April 2015. This patron was the subject of a BCLC barring for five years in February 2018.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
f. ■ ■	<p>This patron was the subject of 60 LCT Reports between February 2014 and April 2015. Great Canadian has filed 20 UFT Reports with respect to this patron.</p> <p>This patron was the subject of a BCLC barring for five years in April 2015. This patron was further barred by BCLC in April 2020.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
g. ■■■■■■■■■■	<p>This patron was the subject of 117 LCT Reports between August 2015 and August 2017. Great Canadian filed one UFT Report with respect to this patron.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
h. Sha, Li Lin	<p>This patron was the subject of 450 LCT Reports between July 2006 and August 2017. Great Canadian has filed 84 UFT Reports with respect to this patron.</p> <p>This patron was the placed on sourced cash and chip conditions in September 2015. This patron was barred by BCLC from the River Rock between July 2017 and September 2017.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
i. Shi, Guo Tai	<p>This patron was the subject of 230 LCT Reports between October 2009 and April 2017. Great Canadian has filed 36 UFT Reports with respect to this patron.</p> <p>This patron was the placed on sourced cash and chip conditions in August 2015.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>

5.

j. Tam, Kwok Chung	<p>Great Canadian filed 5 UFT Reports with respect to this patron.</p> <p>This patron was barred by BCLC in November 2009 (one year), July 2011, January 2012 (five years), and July 2017 (five years).</p>
k. Wei, Kesi	<p>This patron was the subject of 101 LCT Reports between September 2013 and July 2017. Great Canadian has filed 25 UFT Reports with respect to this patron.</p> <p>This patron was the placed on sourced cash and chip conditions in November 2014. In June 2016, this patron was not permitted to attend any high limit room unless the patron was actively gaming with his own buy-in.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
l. [REDACTED]	<p>This patron was the subject of 275 LCT Reports between March 2011 and July 2015. Great Canadian has filed 31 UFT Reports with respect to this patron.</p> <p>This patron was the subject of a BCLC barring for five years in July 2015. Since August 2020, this patron has been on sourced cash and chips conditions.</p> <p>This patron was categorized by BCLC as a high risk patron.</p>
m. Zhao, Yu	<p>This patron was the subject of 33 LCT Reports between January 2007 and October 2011. Great Canadian filed 14 UFT Reports with respect to this patron.</p>

32. Where a patron is indicated as being designated a high risk patron, this categorization would give Great Canadian surveillance a heightened awareness with regards to the individual and increased surveillance monitoring would be conducted by Great Canadian.

Great Canadian Compliance Activities

33. Beginning in March 2019, I was the Chief Compliance Officer for Great Canadian, which includes oversight of AML compliance. In this role, I reported directly to Great Canadian's

Board of Directors. This management structure was directed by Great Canadian's Board of Directors to emphasize and enhance AML compliance.

34. Great Canadian spends millions of dollars annually on compliance activities. It has a dedicated compliance department and compliance programs in each jurisdiction where it operates. The management structure introduced by Great Canadian in recent years includes an Executive Vice-President of Compliance, Vice-Presidents of Compliance in British Columbia, Ontario, and Atlantic Regions, and an Executive Director of AML, who has responsibility for ensuring AML compliance at all Great Canadian properties. Other roles developed to support AML compliance include an AML Analyst, an AML Reporting Coordinator, and additional LCT clerks. In addition, all of these programs and roles are supported by Great Canadian's General Counsel and Chief Privacy Officer.

35. One of the ways that Great Canadian has supported its compliance efforts is through technological solutions.

36. An example of this is using licence plate recognition technology at Great Canadian's facilities, which can assist the police in identifying the location of certain individuals, as well as assisting the casino in refusing entry to self-excluded, trespassed, or banned patrons.

37. In 2014, Great Canadian upgraded to new state of the art surveillance systems at River Rock. This surveillance system has been used by Great Canadian, in conjunction with BCLC, to identify cash drop-offs from suspected loan sharks or associates in its parking lots and then track the associated patrons to the casino.

38. Beginning in March 2019, Great Canadian implemented its own background searches using an open source search system (the Dow Jones DJX Tool) that allows it to conduct its own searches on unknown customers producing \$10,000 or more in cash in real time prior to accepting buy-ins.

39. One of the initiatives that I have personally led since 2018 has been the creation of an AML Steering Committee. This Committee is comprised of key executives from Great Canadian's operations, legal, compliance and privacy departments.

40. Attached and marked as **Exhibit "D"** [GCGC_PROD_0000350] is the original Charter establishing the AML Steering Committee.

41. Great Canadian has further established an AML Champions Committee (comprised of subject matter experts for each region), and a national AML Operations Management Committee.

42. Great Canadian has also sought to increase its AML training for gaming employees. Gaming employees must attend annual mandatory BCLC AML training, which Great Canadian is now supplementing with semi-annual AML refresher training and webinar training for employees on source of funds declarations and reasonable measures forms.

43. In 2019, Great Canadian expanded its AML compliance program beyond its gaming operations and introduced an additional AML policy for its non-gaming operations. Great Canadian's hospitality and food and beverage operations would not normally be required by law to report suspicious transactions to FINTRAC. The policy introduced by Great Canadian requires employees to submit a voluntary information form to FINTRAC whenever there are reasonable grounds to suspect that a non-gaming transaction may be associated with a money laundering offence. Failure to comply with this policy can result in discipline, up to an including termination.

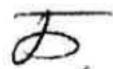
44. Attached and marked as **Exhibit "E"** [GCGC_PROD_0000120] is a copy of Great Canadian's AML Policy for Non-Gaming Operations.

Remote Commissioning

45. I am not physically present before the commissioner taking my affidavit, but am linked with the commissioner by video technology and adhere to the following process for commissioning the affidavit:

(a) I have shown the commissioner the front and back of my government-issued photo identification;

(b) the commissioner has compared the video image of myself and the information on my government-issued photo identification and confirms they are reasonably satisfied that it is the same person;



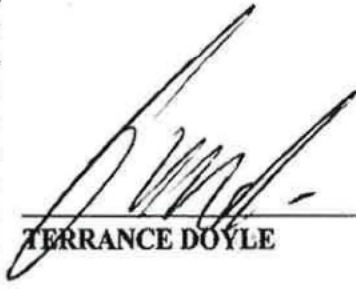
(c) the government-issued identification shown to the commissioner is valid and current; and

(d) the commissioner confirms that a screenshot of the front and back of my government-issued photo identification was taken and confirms that they will retain a copy of it.

SWORN (OR AFFIRMED) BEFORE ME at)
the City of Vancouver, in the Province of)
British Columbia, this 2nd day of February)
2021.)



A Commissioner for taking Affidavits for)
the Province of British Columbia)




TERRANCE DOYLE

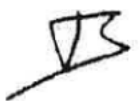
Melanie J. Harmer
Barrister and Solicitor
McMillan LLP
1500 - 1055 West Georgia Street
PO Box 11117
Vancouver, BC V6E 4N7
[REDACTED]



This is Exhibit "A" referred to in the Affidavit of Terrance Doyle, sworn (or affirmed) before me at Vancouver, British Columbia, this 2 day of February, 2021.



A Commissioner for taking Affidavits within the Province of British Columbia





CERTIFICATE OF APPRECIATION

to

River Rock Casino Surveillance Team

In recognition of your continued professional and timely
assistance with criminal investigations.


Richmond RCMP thanks you.

A handwritten signature in black ink, appearing to read "Rendall Nessel", is written over a horizontal line.

Superintendent Rendall Nessel
Officer In Charge, Richmond Detachment
September, 2012

Handwritten initials in black ink, possibly "RN", are located in the bottom right corner of the certificate's border.

This is Exhibit "B" referred to in the Affidavit of Terrance Doyle, sworn (or affirmed) before me at Vancouver, British Columbia, this 2 day of February, 2021.



A Commissioner for taking Affidavits within the Province of British Columbia

Handwritten mark or signature



CERTIFICATE OF APPRECIATION

to

River Rock Casino Surveillance Team

In recognition of your outstanding assistance
conducting surveillance reviews for members
beyond the scope of your regular duties.

Richmond R.C.M.P thanks you.

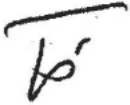


Inspector Rendall Nessel
OIC Richmond Detachment

This is Exhibit "C" referred to in the Affidavit of Terrance Doyle, sworn (or affirmed) before me at Vancouver, British Columbia, this 2 day of February, 2021.



A Commissioner for taking Affidavits within the Province of British Columbia



Message

From: Robert G. Kroeker [REDACTED]
Sent: 4/30/2014 9:30:24 PM
To: Chuck Keeling [REDACTED]; Peter Goudron [REDACTED]; Rod Baker (External)
Subject: RCMP Position on Richmond Review Money Laundering story

FYI.

(Renny is the detachment commander in Richmond)

From: Eric Hall [mailto:[REDACTED]]
Sent: Wednesday, April 30, 2014 2:01 PM
To: Robert G. Kroeker; Nessel, Rendall
Cc: Maloney, Sean
Subject: Re: FYI- media monitoring - Stopping money laundering as simple as placing cop in casino

Hi Rob,


Renny is out of town until next week. As you recall I used to work at IPOC for over a decade and conducted numerous money laundering investigations and have a real in-depth understanding of money laundering. I have spoken to Renny about the issue and we as the police force of jurisdiction are very satisfied with the regimes, policies, and procedures followed by the River Rock, BCLC, FINTRAC, BC Gaming Branch and the police to prevent the activity. We do not have a concern about money laundering at the River Rock. You can tell from the news article, we were not approached or consulted. The solution of a police officer on the floor or surveillance room will not likely stop any sophisticated money laundering operation, anywhere, and I don't believe the casinos in BC can even be a participant in a sophisticated organized money laundering process with the existing reporting regimes to designed to prevent the activity. I know that "proceeds of crime" could potentially be gambled, however, without a extensive investigation by police, the casinos would never be able to determine the source of all funds spent in their facilities. I believe I may be the member who will discuss the issue with Richmond's Community Safety Council, on behalf of Renny.

Gary Clement used to be in-charge of the Proceeds of Crime Program in the RCMP in the 1990's and is currently a consultant in Ontario, so perhaps some of his knowledge is some-what dated and Ontario-centric.

Let me reiterate, on behalf of Renny and the Richmond detachment, we are very comfortable with the River Rock's ability not to facility money laundering. Hope this helps.

Eric.

This is Exhibit "D" referred to in the Affidavit of Terrance Doyle, sworn (or affirmed) before me at Vancouver, British Columbia, this 2 day of February, 2021.



A Commissioner for taking Affidavits within the Province of British Columbia



Project Charter



**Anti-Money Laundering
Steering Committee**

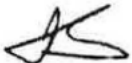
A handwritten signature in black ink, appearing to be the initials 'J' followed by a flourish.

Version History

Name	Date	Description of / Reason for Change	Version
Kamila Baikova	23.08.18	First Draft	V.1
Kamila Baikova	04.09.18	Updates to Steering Committee Team Members	V.2
Kamila Baikova	24.09.18	Updates as per September 4 th meeting	V.3
Kamila Baikova	26.09.18	Wording	V.4
Nana Tamura	15.10.18	Update organization and stakeholder list	V.5

Approvals

Name	Role	Version	Review Date
Pat Ennis	VP, Corporate Security and Compliance	V5.0	Nov. 13, 2018



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1 Glossary

ACAMS	Association of Certified Anti-Money Laundering Specialists
AGCO	Alcohol and Gaming Commission of Ontario, the province's gaming regulator.
AML	Anti-Money Laundering
AMP	Administrative Monetary Penalty
BCLC	British Columbia Lottery Corporation
EFT	Electronic Funds Transfer
FINTRAC	The Financial Transactions and Reports Analysis Centre of Canada
FIPPA	Freedom of Information and Protection of Privacy Act
GCGC	Great Canadian Gaming Corporation
GCRGT	Great Canadian Responsible Gaming Training
GMS	Gaming Management System
GPEB	Gaming Policy and Enforcement Branch (Canada)
GSP	Gaming Service Provider
ITrak	Incident Report and Management System
LCDR	Large Casino Disbursement Report
LCTR	Large Cash Transaction Reports
NBLGC	New Brunswick Lotteries and Gaming Corporation
NSGC	Nova Scotia Gaming Corporation
OLG	Ontario Lottery and Gaming Corporation
OPP	Ontario Provincial Police
PCMLTFA	Proceeds of Crime (Money Laundering) and Terrorist Financing Act
STR	Suspicious Transaction Report
RCMP	Royal Canadian Mounted Police

2 Background

An independent review of BC's anti money laundering policies and practices in Lower Mainland Casinos was conducted by Peter German, under the direction of Attorney General and Minister Responsible for BCLC, David Eby. On June 27, 2018 a comprehensive report was released which included 48 recommendations to improve casino operations.

As a result, Great Canadian Gaming Corporation is forming an AML Steering Committee to provide leadership and guidance and to oversee the implementation of the German report recommendations including establishing key strategies and best practice AML policies and procedures across all GCGC properties nation-wide. GCGC places a high priority and importance on its culture of compliance with compliance being embedded as part of every employee's daily workflow and responsibilities. The Steering Committee will provide further support for this established culture to ensure that a strong culture of compliance is maintained and that continuous improvements are being made.

3 Objective

Proactively respond to Peter German's recommendations stated in the report and expand GCGC's current knowledge and accountability in all jurisdictions by creating an overarching universal approach and practices for suspected money laundering and reporting processes. All changes to policies and procedures will be standardized and approved practices across all GCGC managed properties nationwide will be instituted.

4 Scope

GCGC will support all recommendations of the Peter German's report and all related government initiatives.

GCGC will ensure and promote the importance of all the AML compliance regime by making available and supporting an environment that encourages concerns or recommendations regarding all AML process from all GCGC employees brought forward.

- R1 That the GCA be amended to provide for the Recommendations in this Report
- R2 That the GCA clearly delineate the roles and responsibilities of BCLC and the Regulator
- R3 That BCLC, in conjunction with the Regulator and Service Providers, review the present Source of Funds Declaration on at least an annual basis to determine if refinements are required
- R4 That BCLC re-enforce the importance of Service Providers not accepting cash or other reportable instruments if they are not satisfied with a Source of Funds Declaration.
- R5 That the Service Providers be responsible for completing all necessary reports to FinTRAC, including STRs
- R6 That discussion with FinTRAC take place with the purpose of designating the Service Providers as direct reports to FinTRAC, failing which that reports from Service Providers be sent in an unaltered form to FinTRAC by BCLC
- R7 That BCLC provide Corporate STRs if its files contain relevant information not contained within STR from a Service Provider
- R8 That Service Providers develop the necessary capacity to assess risk and perform due diligence on suspicious transactions
- R9 That the Service Providers copy STRs to BCLC, the regulator (and the DPU), and the RCMP
- R10 That the Regulator / DPU be provided with the access to iTRAK in its offices.
- R11 That UFT and SCT reports be eliminated

- R12 That a Transaction Analysis Team to be developed to review all STRs and that the team be composed of a representative of the Regulator/ DPU, JIGIT, and BCLC.
- R13 That the Transaction Analysis Team meet on at least a weekly basis to review all STRs and Develop strategies to deal with each.
- R14 That JIGIT be provided continuing support with respect to its investigative mandates.
- R15 That Province consider transitioning JIGIT to a permanent, fenced funding model within RCMP's provincial budget.
- R16 That BCLC not engage in further undercover operations, except in conjunction with the Regulator and, or police.
- R17 That no further expense be incurred by BCLC with respect to the SAS AML software system
- R18 That BCLC ensure that VIP hosts do not handle cash or chips
- R19 That persons working in VIP rooms be provided with an independent avenue to report incidents of inappropriate conduct by patrons
- R20 That cash alternatives become the responsibility of the Service Providers, subject to their compliance with overarching standards
- R21 That cash limits not be imposed on buy-ins
- R22 That PGF accounts be eliminated once responsibility for cash alternatives has transitioned to the Service Providers
- R23 That BCLC Implement a chip tracking system for Service Providers
- R24 That the casino industry transition to a standards-based model
- R25 That the foundational standards of the standards-based model be developed by a cross sector of industry and government, building, upon the Ontario Standards, and that they be periodically reviewed and renewed.
- R26 That the CEO / Registrar of the Regulator be the keep of the standards
- R27 That British Columbia transition to an independent regulator in the form of a Service Delivery Crown Corporation, with a Board of Directors and a CEO / Registrar.
- R28 That the Board of Directors of the Regulator be a governance board and not be responsible for appeals from decisions of the Registrar.
- R29 That the regulatory investigators continue to be Special Provincial Constables.
- R30 That anti-money laundering be a responsibility of the Regulator and that it institutes mandatory training for front line gaming personnel, including VIP hosts, with consideration of a Play Right program
- R31 That the Regulator also be the regulator of BCLC and that the BCLC Board, officers and employees be subject to registration.
- R32 That the Regulator provide a 24/7 presence in the Lower Mainland casinos, until a designated policing unit is in place
- R33 That appeals from decisions of the Registrar be sent to an administrative tribunal constituted for this purpose or already in existence.
- R34 That funding of the Regulator continues to be from gaming revenue.
- R35 That the Regulator have dedicated in-house counsel.
- R36 That investigators hired by the Regulator meet core competencies.

- R37 That the Designated Policing Unit (police force) be created to specialize in criminal and regulatory investigations arising from the legal gaming industry, with an emphasis on Lower Mainland casinos.
- R38 That the DPU be an integral part of the Regulator.
- R39 That the DPU not be responsible for investigating illegal gaming outside casinos.
- R40 That the DPU contain an Intelligence Unit.
- R41 That the duties of the OPP Casino Bureau and the Nevada GCB Enforcement Division be reviewed in order to determine an appropriate role for the DPU.
- R42 That anti-money laundering be a specific responsibility of the DPU.
- R43 That funding of the DPU be from gaming revenue.
- R44 That the provincial prosecution service ensure that it has prosecution counsel familiar with gaming law.
- R44 That the provincial prosecution service ensure that it has prosecution counsel familiar with gaming law.
- R45 That the province undertake research into allegations of organized crime penetration of the real estate industry.
- R46 That the Province consider a licensing and recording regime for MSBs, similar to the Metal Dealers Act.
- R47 That the Province consider researching the vulnerability of the luxury car sector and the horse racing sector to organized crime.
- R48 That the Province continue to encourage the federal government to amend the POCMLTFA to broaden the entities subject to reporting, specifically luxury goods of interest to organized crime

Additionally:

- That all forms of customer funded accounts developed across the Company meet regulatory requirements for set up, accounting, method of transfer, encryption and security and reporting.
- That all forms of customer funded accounts for the purposes of gaming meet the requirements of FINTRAC reporting.
- That all forms of House Backed Credit developed across the Company meet regulatory requirements for set up, qualification, cooling off period, accounting, administration, encryption and security and reporting.
- That all forms of house backed credit accounts for the purposes of gaming meet the requirements of FINTRAC reporting

4.1 Approach

The project team will meet on a regular basis to determine responses to recommendations through reoccurring project team meeting that will be reviewed and approved by the Steering Committee. The project team will search out new methods for conducting and reporting transactions that exceed the recommendations where possible.

4.2 Out of Scope

Requirements that are not part of Peter German's recommendations or a part of the regulatory training programs and policy controls are out of scope.

5 Project Organization & Stakeholders

Steering Committee	Rod Baker – President and Chief Executive Officer (<i>Committee Chair</i>)
	Terrance Doyle – Chief Operating Officer (<i>Committee Chair</i>)

	Craig DeMarta – Vice President Operations, East
	Raj Mutti – Vice President Operations, West
	Pat Ennis – Vice President, Corporate Security and Compliance
	Darren Gwozd – Vice President, Operations Finance
	John Russo – Vice President Legal, GCGC
	Chuck Keeling – Vice President, Stakeholder Relations and Responsible Gaming
	David Desmarais – Executive Director, Business Integration
	Shauna Gillespie – Director, Compliance
	Vic Poleschuk – Consultant / Advisor
Project Sponsor	Pat Ennis
Project Director	Raj Mutti and Craig DeMarta
Project Manager	Nana Tamura
Project Team	Richard Procter - VP Operations, One Toronto Gaming
	Chris Roberts – ED, Casino Nova Scotia Sydney / Halifax
	Craig Betts – ED, Ontario Gaming West GTA Limited Partnership
	Ron Urquhart – Executive Director OGELP and Shorelines Casino Belleville
	Christine Pickard – GM, Casino Ajax
	Kate McDonald – GM, Casino New Brunswick Moncton
	Spencer Parazadar – GM, Casino Woodbine
	Michael Worth – GM, Elements Surrey
	Robert Katsavelos - GM, Great Blue Heron
	Darren MacDonald – GM, Hastings Racecourse
	Jimmy Ho – GM, Hard Rock Casino Vancouver
	Michael Kim – GM, River Rock Casino Resort
	Bryan Buchanan – GM, Shorelines Casino Peterborough
	Dale Deane - GM, Shorelines Casino Thousand Island
	Arlene Strongman – Director, Surveillance
	Shawn Duncan – Director, Operations Chances Chilliwack / Dawson Creek
	Angela Charron – Director, Operations Maple Ridge
	Brent Severeys – Regional Manager, Corporate Security and Compliance, Sydney and Halifax
	Rachel White – Manager, Compliance One Toronto
	Sean Clark – Manager, Compliance OGELP
	Krissy Wong – Senior Gaming Compliance Officer

Brandon Henriksen- Compliance officer, Operations West GTA

6 Risks

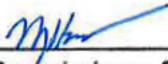
- Added responsibility for reporting and cost associated with resourcing and purchases of required programs and software
- Regulator resistance
- GCGC ability to comply
- Downloaded costs from regulators

7 Dependencies

- Crown corporation's initiatives and cooperation
- Regulator initiatives and cooperation



This is **Exhibit "E"** referred to in the Affidavit of Terrance Doyle, sworn (or affirmed) before me at Vancouver, British Columbia, this 2 day of February, 2021.



A Commissioner for taking Affidavits within the Province of British Columbia





COMPLIANCE STANDARDS

AML Compliance Program for Non-Gaming Operations

Purpose and Scope

The purpose of this policy is to establish responsibilities and procedures with respect to Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) for Great Canadian Gaming Corporation's non-gaming operations, which are not otherwise subject to AML/ATF regulations.

This policy applies to all persons employed by Great Canadian Gaming Corporation, its subsidiaries and affiliates (including any limited partnership that the Corporation has management services agreements with) (together, "GCGC" or "the Company").

Definitions

"FINTRAC", the Financial Transactions and Reports Analysis Centre of Canada, is Canada's national financial intelligence unit. FINTRAC has a mandate to assist in the prevention, detection, and prosecution of Money Laundering and Terrorist Financing offences through the analysis of financial transactions. Its grant of authority is found within the PCMLTFA.

"Money Laundering" is the process by which the source of money or assets derived from criminal activity is placed into a transaction or series of transactions intended to disguise the source of the money or assets and make any tracing of the same difficult or impossible.

"PCMLTFA" Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

"Suspicious Transaction" is defined as a completed or attempted financial transaction where there is reasonable grounds to suspect that 1) the transaction is related to the commission or attempted commission of a Money Laundering offence; or, 2) the transaction is related to the commission or the attempted commission of a Terrorist Financing offence.

Non-gaming suspicious transaction indicators are not limited to include:

- Customer produces large volumes of cash with the primary purpose of converting it to larger denominations.
- Customer books a hotel room, conference room, or a GCGC event for or on behalf of known criminal(s) or a criminal group.
- Customer who has a known association with criminal activity (e.g. fraud, corruption, tax evasion, drug and/or human trafficking offenses) attempts to utilize GCGC services.



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- Customer appears to purchase large volumes of gift cards for suspicious purposes.
- Customer requests for their horseracing / pari-mutuel winnings to be paid to a third party individual.
- Customer attempts to open a horseracing / pari-mutuel account under the name of a third party individual.
- Customer horseracing / pari-mutuel account activities are not consistent with typical account activities.
- Customer sells their horseracing / pari-mutuel winning ticket(s), thereby allowing the winner to collect their winnings without being identified.
- Pari-mutuel / horseracing employees and / or owners performing transactions that appear to be associated with criminal activity.
- Customer utilizes counterfeit financial instruments (e.g. credit cards, money orders, cash and cheques).
- Customer utilizes musty or extremely dirty bills.
- Customer presents currency that is packed or wrapped abnormally.
- Cash is transported by a cash courier.
- Customer is purchasing high valued items and / or services with cash.
- Customer provides false information or information that you have reasonable grounds to suspect is unreliable.
- Customer offers you money, gratuities or unusual favours for the provision of services that may appear unusual or suspicious.
- Customer is the subject of a Money Laundering or Terrorist Financing investigation.
- Customer starts conducting frequent cash transactions in large amounts when this has not been a normal activity for the customer in the past.

"Terrorist Financing" is the collection or provision of funds, either directly or indirectly, for the purposes of carrying out terrorist activities or for the use or benefit of a terrorist organization. Terrorist Financing is an offence in Canada under the Criminal Code.

Canadian legislation and regulations prohibit dealing directly or indirectly with the property of a Listed Person or Terrorist Group or from entering into or facilitating transactions related to this class of property. Listed Persons and Terrorist Groups, which are published on lists maintained by the Office of the Superintendent of Financial Institutions Canada (OSFI). The lists may be found on the OSFI web site at:

<http://www.osfi-bsif.gc.ca/Eng/fi-if/amlc-clrpc/atf-fat/Pages/default.aspx>

"Voluntary Information Record" (VIR) is a record that can be sent to FINTRAC by members of the public and organizations who are not subject to AML/ATF regulations. FINTRAC may only receive voluntary information pertaining to suspicions of Money Laundering or of the financing of



COMPLIANCE STANDARDS

terrorist activities. The Voluntary Information Report Web Form is located on the FINTRAC web site at:

<https://www15.fintrac-canafe.gc.ca/vir-drtv/public/voluntary-information-reporting/information-on-a-person/>

Employee Responsibilities

It is the obligation of every GCGC employee to contribute to a corporate culture of compliance by being aware of and complying with this policy and operational procedures, including those dealing with the prevention of Money Laundering and Terrorist Financing. Non-compliance can affect the integrity of GCGC and may result in the Company being used to facilitate Money Laundering or Terrorist Financing offences, which not only contributes to illicit enterprises but can also lead to serious criminal or regulatory consequences being imposed upon GCGC.

Non-compliance on the part of GCGC employees may result in disciplinary action up to and including termination.

Reporting Attempted Suspicious Transactions

A VIR must be submitted to FINTRAC for all transactions whereby a customer has attempted to perform a transaction where there is reasonable grounds to suspect that the transaction is associated with a Money Laundering or a Terrorist Financing offence.

In circumstances where an employee believes that a customer is attempting a suspicious transaction, the employee must immediately stop the transaction and notify their manager or supervisor.

The manager or supervisor must immediately perform the following:

1. confirm that the transaction has been stopped;
2. confirm that the transaction property (e.g. cash or cheque) has been secured; and
3. notify the Security and Surveillance departments

The Security and Surveillance departments are responsible for performing an investigation into the attempted transaction to determine if it is suspicious.

- In circumstances where Security and Surveillance departments have investigated and verified that a transaction is not suspicious the transaction may proceed.



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- In circumstances where Security and Surveillance departments have investigated and concluded that there is reasonable grounds to suspect that the transaction is suspicious the transaction may not proceed.

If the transaction is believed to be associated with a Money Laundering or a Terrorist Financing offence (e.g. the customer's name has been found on the OSFI listing) the Security and Surveillance departments shall perform and confirm the following:

1. attempt to obtain the customer's name, address and date of birth;
2. facilitate the completion of the VIR;
3. submit the VIR through the FINTRAC website;
4. obtain a copy of the submitted VIR;
5. in the case of a Terrorist Financing attempted transaction, secure all property and applicable evidence;
6. depending upon the province, notify GPEB through the submission of a 86 GC Act report or notify the AGCO through the iAGCO online portal of all horseracing / pari-mutuel attempted transactions; and
7. notify the Vice President Compliance

The Compliance department shall perform the following actions:

1. initiate an investigation;
2. consult with GCGC General/Corporate Counsel and external compliance advisors as required; and
3. if required, confirm the required reports to the RCMP and CSIS.

Reporting Completed Suspicious Transactions

A VIR must be submitted to FINTRAC for all transactions whereby a customer has completed a transaction in which there is reasonable grounds to suspect that the transaction is associated with a Money Laundering or a Terrorist Financing offence.

In circumstances where an employee believes that a customer has completed a suspicious transaction the employee must immediately notify their manager or supervisor.

The manager or supervisor must immediately notify the Security and Surveillance departments who are responsible for performing an investigation of the transaction to determine if it is suspicious.



COMPLIANCE STANDARDS

If the transaction is believed to be associated with a Money Laundering or a Terrorist Financing offence (e.g. the customer's name has been found on the OSFI listing), the Security and Surveillance departments shall perform and confirm the following:

1. attempt to obtain the customer's name, address and date of birth;
2. facilitate the completion of the VIR;
3. submit the VIR through the FINTRAC website;
4. obtain a copy of the submitted VIR;
5. in the case of a Terrorist Financing transaction, secure all property and applicable evidence;
6. depending upon the province, notify GPEB through the submission of a 86 GC Act report or notify the AGCO through the iAGCO online portal of all horseracing / pari-mutuel transactions; and
7. notify the Vice President Compliance

The GCGC Compliance department shall perform the following actions:

1. initiate an investigation;
2. consult with GCGC General/Corporate Counsel and external compliance advisors as required; and
3. if required, confirm the required reports to the RCMP and CSIS.

Voluntary Information Record (VIR) content

The VIR must include the following:

1. all details regarding the attempted or completed transaction;
2. if known, all personal information collected regarding the customer;
3. if known, names and details of the customer and any other individuals associated with the transaction (e.g. any individual(s) who appear to be in control the transaction funds and / or property);
4. all requested and / or required information listed within the VIR; and
5. in the event of a suspicious horseracing / pari-mutuel account activities, all details related to the account and individuals on whose behalf the account holder has opened the account with.



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Record Retention

Where a VIR is required, GCGC must retain a copy of the report and all applicable supporting evidence for a period of five years. VIRs may be stored electronically within the GCGC ITrak system.

Control Information	
Document #:	AML Compliance Program for Non-Gaming Operations
Type:	Corporate Security and Compliance
Applies to:	GCGC subsidiaries and affiliates
Version:	V1
Approved by:	Vice President, Compliance - Atlantic Vice President, Compliance - West