

Overview Report: Casino Surveillance Footage

A. Scope of Overview Report

1. This overview report identifies and attaches video surveillance footage of transactions and related activity taking place in British Columbia casinos along with documents related to the incidents depicted in the video surveillance footage.

B. Appendix 1 - Video Surveillance Footage

2. **Appendix 1** to this overview report is an electronic folder containing video surveillance footage of incidents occurring in British Columbia casinos identified below.

3. Each of the incidents is identified below with reference to the name of a folder included in Appendix 1 in which the video or series of videos can be found, as well as a document associated with the video or series of videos.

C. GCGC_PROD_0023272 (Exhibit 80)

4. Exhibit 80 in the Commission's proceedings, which was entered into evidence on October 26, 2020, is an email dated January 28, 2015, which refers to surveillance footage of eleven incidents.

5. The footage of two of these incidents was entered into evidence on October 26, 2020 as Exhibits 81 and 82.

6. The footage of the remaining nine incidents is included in the following folders in Appendix 1:

- a. 2014-54968
- b. 2014-56969
- c. 2014-62037
- d. 2014-65789
- e. 2015-00425

- f. 2015-00561
- g. 2015-00670
- h. 2015-04976
- i. 2015-03515

D. GPEB4483 & BCLC0015367

7. Attached to this Overview Report as **Appendix 2** is a Report of Findings dated April 9, 2015. This document describes several incidents occurring in British Columbia casinos, which are identified by date and iTrak file number (GPEB4483).

8. Attached to this Overview Report as **Appendix 3** is an iTrak incident report bearing the Incident File #IN20150017386 (BCLC0015367). This document describes several incidents occurring in British Columbia casinos, which are identified by date and iTrak file number. Many of the incidents described in BCLC0015367 are the same as those described in GPEB4483.

9. Surveillance footage of several of these incidents is included in the following folders in Appendix 1. The names of the folders correspond to the iTrak file numbers identified in GPEB2134 and BCLC0015367:

- a. 2015-10104
- b. 2015-10202
- c. 2015-10324
- d. 2015-10346
- e. 2015-10521
- f. 2015-11286
- g. 2015-19377

E. BCLC0015351

10. Attached to this Overview Report as **Appendix 4** is an iTrak incident report bearing the Incident File #IN20140037951 (BCLC0015351).

11. Video surveillance footage associated with this incident report is included in the folder identified as 2014-37951 in Appendix 1.

F. BCLC0016449

12. Attached to this Overview Report as **Appendix 5** is an iTrak incident report bearing the Incident File #IN20140048431 (BCLC0016449).

13. Video surveillance footage associated with this incident report is included in the folder identified as 2014-48431 in Appendix 1.

G. GCGC_PROD_0044306

14. Attached to this Overview Report as **Appendix 6** is a s. 86 report bearing the occurrence number IN-15-09625 – SFT (GCGC_PROD_0044306).

15. Video surveillance footage associated with this incident report is included in the folder identified as 2015-09625 in Appendix 1.

H. BCLC0015449 (Exhibit 88)

16. Exhibit 88 in the Commission's proceedings, which was entered into evidence on October 27, 2020, is an iTrak incident report bearing the Incident File #IN20150010775 (BCLC0015449).

17. Video surveillance footage associated with this incident report is included in the folder identified as 2015-10775 in Appendix 1.

I. BCLC0015363

18. Attached to this Overview Report as **Appendix 7** is an iTrak incident report bearing the Incident File #IN20150010937 (BCLC0015363).

19. Video surveillance footage associated with this incident report is included in the folder identified as 2015-10937 in Appendix 1.

J. BCLC0015368

20. Attached to this Overview Report as **Appendix 8** is an iTrak incident report bearing the Incident File #IN20150018549 (BCLC0015368).

21. Video surveillance footage associated with this incident report is included in the folder identified as 2015-18549 in Appendix 1.

K. BCLC0015376

22. Attached to this Overview Report as **Appendix 9** is an iTrak incident report bearing the Incident File #IN20150021066 (BCLC0015376).

23. Video surveillance footage associated with this incident report is included in the folder identified as 2015-21066 in Appendix 1.

L. BCLC0015875

24. Attached to this Overview Report as **Appendix 10** is an iTrak incident report bearing the Incident File #IN20180029122 (BCLC0015875).

25. Video surveillance footage associated with this incident report is included in the folder identified as 2018-29122 in Appendix 1.

M. BCLC0015876

26. Attached to this Overview Report as **Appendix 11** is an iTrak incident report bearing the Incident File #IN20180029146 (BCLC0015876).

27. Video surveillance footage associated with this incident report is included in the folder identified as 2018-29146 in Appendix 1.

N. BCLC0015877

28. Attached to this Overview Report as **Appendix 12** is an iTrak incident report bearing the Incident File #IN20180029582 (BCLC0015877).

29. Video surveillance footage associated with this incident report is included in the folder identified as 2018-29582 in Appendix 1.

O. BCLC0015878

30. Attached to this Overview Report as **Appendix 13** is an iTrak incident report bearing the Incident File #IN20180029809 (BCLC0015878).

31. Video surveillance footage associated with this incident report is included in the folder identified as 2018-29809 in Appendix 1.

P. BCLC0015879

32. Attached to this Overview Report as **Appendix 14** is an iTrak incident report bearing the Incident File #IN20180030008 (BCLC0015879).

33. Video surveillance footage associated with this incident report is included in the folder identified as 2018-30008 in Appendix 1.

Q. BCLC0015880

34. Attached to this Overview Report as **Appendix 15** is an iTrak incident report bearing the Incident File #IN20180030109 (BCLC0015880).

35. Video surveillance footage associated with this incident report is included in the folder identified as 2018-30109 in Appendix 1.

R. BCLC0015881

36. Attached to this Overview Report as **Appendix 16** is an iTrak incident report bearing the Incident File #IN20180030356 (BCLC0015881).

37. Video surveillance footage associated with this incident report is included in the folder identified as 2018-30356 in Appendix 1.

S. BCLC0015882

38. Attached to this Overview Report as **Appendix 17** is an iTrak incident report bearing the Incident File #IN20180033403 (BCLC0015882).

39. Video surveillance footage associated with this incident report is included in the folder identified as 2018-33403 in Appendix 1.

T. BCLC0015883

40. Attached to this Overview Report as **Appendix 18** is an iTrak incident report bearing the Incident File #IN20180033893 (BCLC0015883).

41. Video surveillance footage associated with this incident report is included in the folder identified as 2018-33893 in Appendix 1.

U. BCLC0015884

42. Attached to this Overview Report as **Appendix 19** is an iTrak incident report bearing the Incident File #IN20180034488 (BCLC0015884).

43. Video surveillance footage associated with this incident report is included in the folder identified as 2018-34488 in Appendix 1.

V. BCLC0015886

44. Attached to this Overview Report as **Appendix 20** is an iTrak incident report bearing the Incident File #IN20180046314 (BCLC0015886).

45. Video surveillance footage associated with this incident report is included in the folder identified as 2018-46314 in Appendix 1.

W. BCLC0015890

46. Attached to this Overview Report as **Appendix 21** is an iTrak incident report bearing the Incident File #IN20190044132 (BCLC0015890).

47. Video surveillance footage associated with this incident report is included in the folder identified as 2019-44132 in Appendix 1.

X. BCLC0015891

48. Attached to this Overview Report as **Appendix 22** is an iTrak incident report bearing the Incident File #IN20190044265 (BCLC0015891).

49. Video surveillance footage associated with this incident report is included in the folder identified as 2019-44265 in Appendix 1.

Y. BCLC0016414

50. Attached to this Overview Report as **Appendix 23** is an iTrak incident report bearing the Incident File #IN20200002279 (BCLC0016414).

51. Video surveillance footage associated with this incident report is included in the folder identified as 2020-02279 in Appendix 1.

Z. BCLC0016415

52. Attached to this Overview Report as **Appendix 24** is an iTrak incident report bearing the Incident File #IN20200002280 (BCLC0016415).

53. Video surveillance footage associated with this incident report is included in the folder identified as 2020-02280 in Appendix 1.

AA. BCLC0016416

54. Attached to this Overview Report as **Appendix 25** is an iTrak incident report bearing the Incident File #IN20200002422 (BCLC0016416).

55. Video surveillance footage associated with this incident report is included in the folder identified as 2020-02422 in Appendix 1.

BB. BCLC0016417

56. Attached to this Overview Report as **Appendix 26** is an iTrak incident report bearing the Incident File #IN20200004616 (BCLC0016417).

57. Video surveillance footage associated with this incident report is included in the folder identified as 2020-04616 in Appendix 1.

CC. BCLC0016418

58. Attached to this Overview Report as **Appendix 27** is an iTrak incident report bearing the Incident File #IN20200005173 (BCLC0016418).

59. Video surveillance footage associated with this incident report is included in the folder identified as 2020-05173 in Appendix 1.

DD. BCLC0016419

60. Attached to this Overview Report as **Appendix 28** is an iTrak incident report bearing the Incident File #IN20200005354 (BCLC0016419).

61. Video surveillance footage associated with this incident report is included in the folder identified as 2020-05354 in Appendix 1

EE. BCLC0016420

62. Attached to this Overview Report as **Appendix 29** is an iTrak incident report bearing the Incident File #IN20200005745 (BCLC0016420).

63. Video surveillance footage associated with this incident report is included in the folder identified as 2020-05745 in Appendix 1.

FF. BCLC0016421

64. Attached to this Overview Report as **Appendix 30** is an iTrak incident report bearing the Incident File #IN20200006109 (BCLC0016421).

65. Video surveillance footage associated with this incident report is included in the folder identified as 2020-06109 in Appendix 1.

GG. BCLC0016422

66. Attached to this Overview Report as **Appendix 31** is an iTrak incident report bearing the Incident File #IN20200006138 (BCLC0016422).

67. Video surveillance footage associated with this incident report is included in the folder identified as 2020-06138 in Appendix 1.

HH. BCLC0016423

68. Attached to this Overview Report as **Appendix 32** is an iTrak incident report bearing the Incident File #IN20200006443 (BCLC0016423).

69. Video surveillance footage associated with this incident report is included in the folder identified as 2020-06443 in Appendix 1.

II. BCLC0016424

70. Attached to this Overview Report as **Appendix 33** is an iTrak incident report bearing the Incident File #IN20200006510 (BCLC0016424).

71. Video surveillance footage associated with this incident report is included in the folder identified as 2020-06510 in Appendix 1.

JJ. BCLC0016425

72. Attached to this Overview Report as **Appendix 34** is an iTrak incident report bearing the Incident File #IN20200007634 (BCLC0016425).

73. Video surveillance footage associated with this incident report is included in the folder identified as 2020-07634 in Appendix 1.

KK. BCLC0016426

74. Attached to this Overview Report as **Appendix 35** is an iTrak incident report bearing the Incident File #IN20200008074 (BCLC0016426).

75. Video surveillance footage associated with this incident report is included in the folder identified as 2020-08074 in Appendix 1.

LL. BCLC0016427

76. Attached to this Overview Report as **Appendix 36** is an iTrak incident report bearing the Incident File #IN20200008140 (BCLC0016427).

77. Video surveillance footage associated with this incident report is included in the folder identified as 2020-08140 in Appendix 1.

MM. BCLC0016429

78. Attached to this Overview Report as **Appendix 37** is an iTrak incident report bearing the Incident File #IN20200009067 (BCLC0016429).

79. Video surveillance footage associated with this incident report is included in the folder identified as 2020-09067 in Appendix 1.

NN. BCLC0016430

80. Attached to this Overview Report as **Appendix 38** is an iTrak incident report bearing the Incident File #IN202010193 (BCLC0016430).

81. Video surveillance footage associated with this incident report is included in the folder identified as 2020-10193 in Appendix 1.

OO. BCLC0016431

82. Attached to this Overview Report as **Appendix 39** is an iTrak incident report bearing the Incident File #IN20200010661 (BCLC0016431).

83. Video surveillance footage associated with this incident report is included in the folder identified as 2020-10661 in Appendix 1.

PP. BCLC0016432

84. Attached to this Overview Report as **Appendix 40** is an iTrak incident report bearing the Incident File #IN202011085 (BCLC0016432).

85. Video surveillance footage associated with this incident report is included in the folder identified as 2020-11085 in Appendix 1.

QQ. BCLC0016437

86. Attached to this Overview Report as **Appendix 41** is an iTrak incident report bearing the Incident File #IN202012429 (BCLC0016437).

87. Video surveillance footage associated with this incident report is included in the folder identified as 2020-12429 in Appendix 1.

RR. BCLC0016438

88. Attached to this Overview Report as **Appendix 42** is an iTrak incident report bearing the Incident File #IN202012665 (BCLC0016438).

89. Video surveillance footage associated with this incident report is included in the folder identified as 2020-12665 in Appendix 1.

SS. BCLC0016439

90. Attached to this Overview Report as **Appendix 43** is an iTrak incident report bearing the Incident File #IN202012798 (BCLC0016439).

91. Video surveillance footage associated with this incident report is included in the folder identified as 2020-11689 in Appendix 1.

TT. BCLC0016440

92. Attached to this Overview Report as **Appendix 44** is an iTrak incident report bearing the Incident File #IN202012826 (BCLC0016440).

93. Video surveillance footage associated with this incident report is included in the folder identified as 2020-12826 in Appendix 1.

UU. BCLC0016441

94. Attached to this Overview Report as **Appendix 45** is an iTrak incident report bearing the Incident File #IN202013907 (BCLC0016441).

95. Video surveillance footage associated with this incident report is included in the folder identified as 2020-13907 in Appendix 1.

VV. BCLC0016442

96. Attached to this Overview Report as **Appendix 46** is an iTrak incident report bearing the Incident File #IN202014563 (BCLC0016442).

97. Video surveillance footage associated with this incident report is included in the folder identified as 2020-14563 in Appendix 1.

WW. BCLC0016443

98. Attached to this Overview Report as **Appendix 47** is an iTrak incident report bearing the Incident File #IN202014900 (BCLC0016443).

99. Video surveillance footage associated with this incident report is included in the folder identified as 2020-14900 in Appendix 1.

XX. BCLC0016444

100. Attached to this Overview Report as **Appendix 48** is an iTrak incident report bearing the Incident File #IN202015039 (BCLC0016444).

101. Video surveillance footage associated with this incident report is included in the folder identified as 2020-15039 in Appendix 1.

YY. BCLC0016445

102. Attached to this Overview Report as **Appendix 49** is an iTrak incident report bearing the Incident File #IN202016290 (BCLC0016445).

103. Video surveillance footage associated with this incident report is included in the folder identified as 2020-16290 in Appendix 1.

ZZ. BCLC0016446

104. Attached to this Overview Report as **Appendix 50** is an iTrak incident report bearing the Incident File #IN202016347 (BCLC0016446).

105. Video surveillance footage associated with this incident report is included in the folder identified as 2020-16347 in Appendix 1.

AAA. BCLC0016447

106. Attached to this Overview Report as **Appendix 51** is an iTrak incident report bearing the Incident File #IN202016698 (BCLC0016447).

107. Video surveillance footage associated with this incident report is included in the folder identified as 2020-16698 in Appendix 1.

BBB. BCLC0016864/GPEB5677

108. Attached to this Overview Report as **Appendix 52** is an iTrak incident report bearing the Incident File #IN20090047956 (BCLC0016864).

109. Video surveillance footage associated with this incident report is included in the folder identified as GPEB5677 in Appendix 1.

CCC. BCLC0016865/GPEB5678

110. Attached to this Overview Report as **Appendix 53** is an iTrak incident report bearing the Incident File #IN20100052485 (BCLC0016865).

111. Video surveillance footage associated with this incident report is included in the folder identified as GPEB5678 in Appendix 1.

Appendix 2

Report of Findings dated April 9, 2015 (GPEB4483).

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REPORT OF FINDINGS

Date: April 9, 2015

CONFIDENTIAL

This document is the property of the Investigations and Regional Operations Division, Gaming Enforcement. It is confidential and shall not be disclosed or divulged, in whole or in part, without prior consent of the writer.

Allegation:

1. Breach of the Integrity of Gaming

Qi LI {Coco}

DOB: PERSONAL INFORMATION

GAMW # 32455

PERSONAL INFORMATION

[REDACTED]

[REDACTED]

[REDACTED]

GPEB File # 90850

BACKGROUND:

Qi LI

Qi LI has been an employee with the Edgewater Casino, employed since July 2007. Her duties are that of a Dealer. She has an extensive gaming history as a player that includes chip and cash passing activities and involvement in suspicious cash transactions in which small bills were used. She opened a PGF account in May 2014.

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SYNOPSIS:

A review was conducted by the Investigations Division, pursuant to the receipt of information provided by BCLC Investigator S. BEEKSMA regarding suspicious activities carried out by LI at the River Rock Casino and Resort {RRCR}.

The information provided to GPEB Compliance indicated LI was involved in the following incidents:

July 28, 2014, {14-37951}

Qi LI was in the VIP Room of the RRCR with [PERSONAL INFORMATION]. After [PERSONAL INFO] had received a phone call Qi LI left the casino. She met with an unidentified vehicle in the middle of River Road. She obtained a bag of cash amounting to \$100,100.00.00 with the cash consisting entirely of \$20.00 bills. She returned to the room and passed the cash to [PERSONAL INFO].

Feb 14, 2015, {15-08199}

Qi LI accompanied male subject [PERSONAL INFORMATION] to the RRCR in a vehicle. [PERSON] produced \$100,000.00 in a bag. The cash consisted entirely of \$20.00 bills. [PERSON] gambled while LI sat at the table and watched his play.

Feb 20, 2015, {15-09353}

Qi LI accompanied male subject [PERSONAL INFORMATION] to the RRCR in a taxi. [PERSON] produced \$310,000.00 in a bag, primarily in \$20.00 bills. [PERSON] gambled while LI sat at the table and watched his play.

Feb 21, 2015, {09625}

Qi LI accompanied by male subject [PERSONAL INFORMATION] returned to the RRCR in a taxi. LI carried a bag into the RRCR which she passed to [PERSON] just before entering the VIP Room. [PERSON] emptied the bag for a buy-in of \$185,005.00. Upon receipt of the chips [PERSON] gambled while LI sat at the table and watched.

Feb 23, 2015, {15-10104}

Qi LI and male subject [PERSONAL INFORMATION] arrived at the RRCR in a taxi. [PERSONAL INFO] carried a bag into the VIP Room which he emptied for a buy-in of \$250,000.00 with the cash consisting of \$20.00

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bills. Both subjects sat together at a gaming table but there was no play. [PERSONAL INFORMATION] entered the room and at least \$100,000.00 of the chips were passed to him in the washroom.

Feb 24, 2015, {15-10202}

Qi Li and [PERSONAL INFORMATION] arrived at the RRCR in a taxi. [PERSONAL INFO] was in possession of a bag. They met with [PERSONAL INFORMATION] who was already at the RRCR and all subjects went to the VIP Room. [PERSON] took possession of the bag and emptied the contents for a buy-in of \$290,000.00 with the cash primarily consisting of \$20.00 bills. [PERSON] subsequently played with LI and [PERSONAL INFO] watching the play.

Feb 25, 2015, {15-10324}

With the gaming event continuing into the early morning of Feb 25th [PERSONAL INFORMATION] passed \$30,000.00 in chips to Qi Li.

Feb 25, 2015, {15-10346}

Qi Li went to a room on the 8th floor of the hotel. She exited the room with a bag which she brought to the VIP room. She bought-in for \$100,000.00 with most of the cash consisting of \$20.00 bills. Upon the receipt of the chips, LI placed them into her purse without play and returned to the room on the 8th floor of the hotel.

Feb 26, 2015, {15-10104}

Qi Li and [PERSONAL INFORMATION] arrived at the RRCR in a taxi. [PERSONAL INFO] was in possession of a bag. They went to the VIP Room and [PERSONAL INFO] bought-in for \$190,000.00 with most of the cash consisting of \$20.00 bills. [PERSONAL INFO] did not play with these chips. [PERSONAL INFO] arrived and he commenced his play with them while [PERSONAL INFO] and LI watched the play.

Feb 27, 2015, {15-10937}

Qi Li accompanied by [PERSONAL INFORMATION] and [PERSONAL INFORMATION] arrived at the RRCR in a taxi. [PERSONAL INFO] exited the vehicle with a bag which was passed to LI. All three subjects went to a room on the 7th floor of the hotel. Subsequently LI and [PERSON] exited the room with LI carrying a bag that was later determined to contain the buy-in cash. They went to the hotel registration desk where the bag was passed to [PERSON]. LI then dealt with the desk person while [PERSON] went to the VIP Room with the bag. This buy-in was for \$200,000.00 with most of the cash consisting of \$20.00 bills. LI joined [PERSON] in the cash cage while passing what appeared to be a hotel key to him. [PERSON] subsequently played while LI sat at the table and watched.

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March 1, 2015, {15-11286}

Qi LI and [PERSONAL INFORMATION] arrived at the RRCR in a taxi. [PERSONAL INFO] was in possession of a bag. They went to the VIP Room and [PERSONAL INFO] bought-in for \$110,000.00 with all of the cash consisting of \$20.00 bills. [PERSONAL INFO] did not play with these chips. He placed them into his pocket and went to the room on the 7th floor of the hotel.

April 1, 2015, {15-17249}

Qi LI arrived at the RRCR in a taxi. She was in possession of a bag which she brought to the 3rd floor lobby area. Female subject [PERSONAL INFO] was already playing in the VIP Room. She left the room and met with LI who passed the bag to her. [PERSONAL INFO] took the bag to the cash cage for a buy-in of \$49,985.00 with the cash consisting almost entirely of \$20.00 bills.

April 8, 2015, {15-18549}

Qi LI arrived at the RRCR in a taxi. She was in possession of a bag which she brought to the 3rd floor lobby area. Male subject Jia Gui GAO was already playing in the VIP Room. He left the room and met with LI who passed the bag to him. GAO took the bag to the cash cage for a buy-in of \$300,000.00 with the cash consisting entirely of \$20.00 bills. Of further note is the fact that GAO had already received \$300,000.00 in cash earlier in the day from suspected loan shark Paul King JIN.

April 12, 2015, {15-19377}

Qi LI arrived at the RRCR with an unidentified Asian male. She made phone contact with Jia Gui GAO who was already playing in the VIP Room. She then entered the VIP room and passed \$500,000.00 in chips to him. She then left the casino in a taxi.

INVESTIGATION:

At approximately 10:00 hours, April 13, 2015, I reviewed the footage of Qi LI who was observed delivering \$300,000.00 in cash to high-limit player Jia Gui GAO at 20:42 hours on April 8, 2015. It

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was noted that GAO had earlier in the evening received \$300,000.00 from an unidentified subject who was driving a van known to be used by suspected loan shark Paul King JIN.

ON April 13, 2015 information was received from GCGC by Form 86 that Qi LI had delivered \$500,000.00 in chips to Jia Gui GAO on April 12, 2015. The source of the chips is unknown.

The incident on April 12, 2015 was the 11th suspicious incident involving Qi LI at the RRCR. I therefore contacted her on April 13, 2015 at 12:30 hours at which time an interview was scheduled with her at the GPEB Burnaby office.

On April 13, 2015 I also contacted GPEB Director of Registrations G. BAILLIE and provided him the information relating to this matter. G. BAILLIE subsequently suspended Qi LI's registration pending the conclusion of the investigation.

At 16:00 hours I was contacted by GPEB Investigator C. BURROWS. He informed me that Qi LI had resigned from her position at the Edgewater Casino. At that time she informed her employer that she was leaving to accept a position in the gaming industry in Las Vegas.

On April 14, 2015 I spoke with BCLC Investigator S. BEEKSMA. He will be submitting a one year prohibition recommendation to the BCLC committee responsible for provincial prohibitions.

On April 16, 2015 Qi LI failed to attend for her scheduled interview at the Burnaby GPEB office.

In consideration of her resignation, no further investigative steps will be taken by GPEB.

Interview:

-Nil-

FINDINGS IN GENERAL:

The video evidence clearly shows Qi LI delivering \$300,000.00 in cash to Jia Gui GAO on April 8, 2015.

There are 13 other Form 86 reports of inappropriate conduct by her, involving suspicious cash transactions or incidents in which gaming chips were delivered to high-limit players at the RRCR beginning in July 2014.

Qi LI was assisting or facilitating in the delivery of large quantities of cash or gaming chips to high-limit payers at the RRCR. This cash consisted primarily of bills of small denomination. The source of the chips is unknown.

There is no known legitimate source of the funds delivered to the casino by Qi LI. There was no legitimate reason for her to be in possession of large quantities of gaming chips.

Investigator: R. Barber
GPEB File # 88407

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Discussion

Qi LI chose to resign, either as a result of her contact with GPEB, her suspension from her position at the Edgewater Casino, or both factors.

Regardless of her resignation decision, she has displayed behaviour that is incompatible with being a registered gaming worker.

\$ 2,715,090

CONCLUSIONS

Qi LI chose to resign from her position at the Edgewater Casino subsequent to contact with GPEB.

Over a protracted time period and during multiple incidents, Qi LI conducted herself in a manner that was incompatible with her status as a registered gaming worker.

The resignation renders further investigative effort on the part of GPEB unnecessary.

Prepared by:

Rob Barber
Investigator #937
Gaming Policy & Enforcement Branch
Compliance Division

Approved by:

Derek Dickson
Director,
Gaming Policy & Enforcement Branch
Compliance Division

Copy: Garth Baillie – Director Personnel Registration

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Appendix 3

iTrak incident report bearing the Incident File #IN20150017386 (BCLC0015367).

Incident File Full Report**Incident File #IN20150017386**

Date/Time Occurred: 4/ 2/2015 3:25 PM
Day of Week Occurred: Thursday
Date/Time Created: 4/ 2/2015 3:26 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: BCLC Corporate Security
Owner: sbeeksma
Operator ID: sbeeksma
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Vancouver (BCLC)
Location:
Sublocation:

Details of Incident:

Daily Log #: DL20150310338
Related Incidents: IN20150021394
Type: Assistance To
Specific: BCLC
Category:
Incident Status: Under Investigation
Synopsis: Summary of LI, Qi SID 140681 suspicious incidents.
Checklist:

Narrative:

Created On	Created By	Modified On	Modified By
4/ 2/2015 3:26 PM	sbeeksma	4/23/2015 9:02 AM	sbeeksma
Summary of LI, Qi SID 140681 suspicious incidents as of 2015-APR-21.			

Executive Brief:**Participants Involved:****Subject**

Full Name: LI, Qi **Company:** Edgewater Casino
Role: Accused

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20150017386****Supplemental Entries:**

SP20150048571 Attached by sbeeksma on Apr 2, 2015 15:27

Description LI, Qi (f)
 DOB [PERSONAL INFORMATION]
 SID 140681

Redacted - FINTRAC

2014-JUL-28 @ RRCR 2014-37951 – LI exited the casino and met with a vehicle where she acquired a shopping bag containing approx \$200K. The bag was taken back into the casino and given to a high level player identified as [PERSONAL INFORMATION] (SID 86709).

2014-NOV-10 @ RRCR 2014-56969 – LI was seen seated at a gaming table with a high limit player: WEI, Kesi (SID 144419). They were observed conversing at the table and WEI eventually went to a room in the resort where he acquired \$400K cash to further his gaming (may have been WEI's room). LI had no clear involvement in WEI acquiring this money but she was attached as a participant to the incident file.

2015-FEB-14 @ RRCR 2015-08199 – LI arrived on site with a player identified as [PERSONAL INFORMATION] (SID 163130) in a vehicle driven by [PERSONAL INFORMATION]. [PERSONAL INFORMATION] produced \$100K in cash for purchase of chips. LI remained with [PERSONAL INFORMATION] observing his play (there is not indication she gambled with him).

2015-FEB-20 @ RRCR 2015-09353 - LI arrived on site with a player identified as [PERSONAL INFORMATION] (SID 107757) via taxi. LI assisted [PERSONAL INFORMATION] in transporting a suitcase to the VIP Salon that contained \$310,020 cash [PERSONAL INFORMATION] used for purchasing chips. LI remained with [PERSONAL INFORMATION] observing play.

2015-FEB-21 @ RRCR 2015-9625 - LI arrived on site with a player identified as [PERSONAL INFORMATION] (SID 107757) via taxi. LI assisted [PERSONAL INFORMATION] in transporting a shopping bag to the VIP Salon that contained \$185,005 cash [PERSONAL INFORMATION] used for purchasing chips. LI remained with [PERSONAL INFORMATION] observing play.

2015-FEB-23 @ RRCR 2015-10104 and 2015-10202 – LI arrives on site with a patron identified as [PERSONAL INFORMATION] (SID 107764) via taxi. [PERSONAL INFORMATION] was in possession of a green shopping bag that contained \$250,000 cash he used for purchase of chips. The chips ended up with another player; [PERSONAL INFORMATION] (SID 107757).

Later this same date LI and [PERSONAL INFORMATION] return to the casino with another shopping bag that contained \$290,000 in un-sourced cash. This bag was provided to [PERSONAL INFORMATION] who used the cash for purchasing chips.

2015-FEB-25 @ RRCR 2015-10346 – LI purchased \$100K in casino chips with un-sourced cash and left the casino upon receipt of the chips without engaging in any gambling. She entered a hotel room in the resort at which time continuity of the chips was lost. It is not known with whom these chips ended up with but LI did not gamble with them.

2015-FEB-26 @ RRCR 2015-10521 - LI arrives on site with a patron identified as [PERSONAL INFORMATION] (SID 107764) via taxi. [PERSONAL INFORMATION] was in possession of a blue and white shopping bag that contained \$190,000 cash he used for purchase of chips. [PERSONAL INFORMATION] leaves the chips on the table and shortly after another player; [PERSONAL INFORMATION] (SID 107757) takes possession and begins to gamble with them.

2015-FEB-27 @ RRCR 2015-10937 - LI arrives on site with patrons identified as [PERSONAL INFORMATION] (SID 107764) and [PERSONAL INFORMATION] (SID 107757) via taxi. LI helps the men wheel 3 large hard shell suitcases from the taxi into a room in the resort. LI and [PERSONAL INFORMATION] exit the room soon after. [PERSONAL INFORMATION] is in possession of a shopping bag that contained \$200K cash he used to purchase chips. The contents of the 3 suitcases could not be confirmed.

2015-MAR-01 @ RRCR 2015-11286 - LI arrives on site with a patron identified as [PERSONAL INFORMATION]

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20150017386**

SP20150048571 Attached by sbeeksma on Apr 2, 2015 15:27

SP2015004857

1 - Continued-

PERSONAL INFO (SID 107764) via taxi. PERSONAL INFO is in possession of a back pack that contained \$110K in un-sourced cash. Upon receipt of the chips PERSONAL INFO collects them and is seen entering a room in the resort at which time continuity of the chips was lost. It was suspected that PERSONAL INFORMATION (SID 107757) may have been in the room or ended up with these chips.

2015-MAR-30 @ RRCR 2015-16789 – LI is believed to have acquired \$50K in un-sourced cash from an unknown Asian male which she then provided to a female player identified as PERSONAL INFO (SID 141503) who used the cash for purchasing chips.

2015-APR-01 @ RRCR 2015-17249 – LI delivered a shopping bag containing \$50K in un-sourced \$20 bills to a female player identified as PERSONAL INFO (SID 141503) who used the cash for purchasing chips.

2015-APR-08 @ RRCR 2015-18549 – LI delivered a shopping bag containing \$300K in un-sourced cash to a male player identified as GAO, Jia (SID 142378). LI arrived alone in a taxi in possession of the cash and met with GAO in the hotel lobby.

2015-APR-12 @ RRCR 2015-19377 – LI delivered \$400-500K in RRCR \$5K chips to a male patron identified as GAO, Jia (SID 142378). The chips were delivered inside a plastic bag and secured with clear plastic wrap in \$100K stacks.

2015-APR-14 @ RRCR 2015-19640 – LI received an undisclosed amount of \$5K chips inside a plastic bag (est. 1 million) from a player identified as GAO, Jia (SID 142378). LI eventually met with another female in the washroom then provided at least \$300K in chips to another player identified as PERSONAL INFORMATION. LI went to great lengths to hide her actions including activity in the washroom and using the gaming table to shield her actions from the surveillance cameras.

2015-APR-18 @ RRCR 2015-20452 – LI bought in for \$12K and passed approx \$5K to another female patron. LI was observed gambling with the remaining \$7K.

2015-APR-18 @ RRCR 2015-20523 – LI appeared to be coordinating the chip pass between 2 players. A male patron identified as PERSONAL INFORMATION (SID#77247) provided \$10K in chips to a female identified as PERSONAL INFORMATION (SID#2851) seemingly at the direction of LI.

2015-APR-19 @ RRCR 2015-20719 – LI along with another female identified as PERSONAL INFO (SID 141503) are seen taking turns using LI's cell phone. A male patron identified as PERSONAL INFORMATION is seen using the cell at around the same time after which he passed \$10K in chips to LI which are shared between LI and PERSONAL INFO.

2015-APR-21 @ RRCR 2015-21054 – LI receives a single \$5K chips from GAO Jia Gui (sid#142378) but returns it to him soon after. GAO then passes it to his female companion (PERSONAL INFORMATION sid#173720) who enters the washroom with LI. LI has been increasingly more careful to not be detected receiving or passing chips which is likely why she preferred to receive it in the washroom (off camera).

2015-APR-21 @ VILLA 2015-21066 – LI delivered a bag containing \$50K in un-sourced small denomination bills to a female player identified as PERSONAL INFO (SID 141503). LI remained with PERSONAL INFO at the gaming table observing play.

Some chip pass incidents of note are as follows:

2014-DEC-06 @ RRCR 2014-61428 – LI received \$10K in chips covertly (under the table) from a player identified as PERSONAL INFORMATION (SID 140770). All persons were reportedly approached and warned against such behaviour by site management.

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20150017386**

SP20150048571 Attached by sbeeksma on Apr 2, 2015 15:27

SP2015004857

1 - Continued-

2014-DEC-13 @ RRCR 2014-62811 – LI received approx \$4K in chips from a female player identified as [REDACTED] (SID# 67255) in a covert manner (under the table). Neither were warned by site management this date.

2014-OCT-26 @ RRCR 2014-54305 – LI passed approx \$5K in chips to a male player identified as [REDACTED] SID#156773. She was approached by site staff and cautioned against this. She claimed it wasn't chips she passed but a cell phone. Surveillance clearly showed chips and LI eventually admitted it was chips claiming that she and [REDACTED] are "friends". [REDACTED] had lost the chips and left the site before the site could approach him.

2014-SEP-24 @ RRCR 2014-48458 – [REDACTED]

Redacted - FINTRAC

Redacted - FINTRAC

As detailed in this report, LI was observed passing approx \$55K in chips to WEI. Neither were approached by site management.

Redacted - FINTRAC

*LI has now been associated to and seemingly facilitated cash/chips for approx 7 individual high level players in BC Casinos over the past year.

*LI has numerous LCT records for both buy ins and disbursements. Of note is that she did not have any LCT records on the incident dates detailed above other than the 2015-FEB-25 incident whereby she purchased \$100K in chips and did not play.

*LI holds a PGF account #375 at RRCR. During the opening account process she updated her occupation with cage staff from EDGE card dealer to "Housewife".

According to iTrak personnel LI is still employed at EDGE as a card dealer but information received 2015-APR-14 indicates she has resigned.

As per personnel LI was employed as a dealer at EDGE since 2007-JUL-22 with GPEB registration number 37538.

It is concerning that a dealer employed in a BC Casino is involved in these types of incidents. As a condition of employment LI would have had to complete various levels of training including Appropriate Response Training (ART) and Anti-Money Laundering (AML). She would have intimate knowledge of some casino systems and procedures surrounding what are industry indicators of unusual/suspicious activity.

The writer has verbally discussed the concerns around LI's activity with RRCR's GPEB investigator.

A copy of this summary has been sent to BCLC Corporate Security Management on 2015-APR-02 to aid in determining an appropriate course of action.

2015-APR-02 the writer discussed the concerns with GPEB's BARBER (in person) who confirmed that he and GPEB investigator Colin BURROWS (assigned to EDGE) were investigating LI's activity and running some back ground checks which would likely conclude with someone from GPEB interviewing LI regarding her suspicious activity in the casino.

BARBER advised he would keep the writer updated as much as he is able to.

BCLC management updated.

2015-APR-14 BCLC investigator Tom PLANTE assigned to EDGE casino advised that LI has resigned from her employment at EDGE. According to EDGE management LI informed them that she is going to Las Vegas to be an "independent agent".

The writer called GPEB investigator Rob BARBER who confirmed that he had made contact with LI yesterday to arrange a time for them to meet. LI apparently called back approx 3 hours later advising that she has ended her employment at EDGE.

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20150017386**

SP20150048571 Attached by sbeeksma on Apr 2, 2015 15:27

SP2015004857

1 - Continued-

BARBER confirmed that it is highly unlikely LI would meet with GPEB investigators and saw no reason why any sanctions decided by BCLC would have a negative impact on their investigation now that LI has resigned.

Further recent incidents since this summary was drafted have been added above.

A copy of this updated summary has been sent to BCLC management on 2015-APR-14 recommending LI be provincially banned for repeated incidents of inappropriate transfer cash/chips (length of ban to be determined).

2015-APR-22 - A copy of this incident was sent to BCLC management recommending LI be provincially banned 1 year for inappropriate transfer of cash/chips (with consideration to extend should behaviours continue while prohibited).

S.BEEKSMA
BCLC
Casino Investigations

SP20150059727 Attached by kgade on Apr 23, 2015 13:30

Description 2015-04-23

Five (5) Year BCLC Provincial Ban approved.

(K GADE)
Manager, Investigations

Reporting Party:**Supervisor:**

Printed: 7/30/2020 7:04 AM

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Appendix 3

Appendix 4

iTrak incident report bearing the Incident File #IN20140037951 (BCLC0015351).

Incident File Full Report**Incident File #IN20140037951**

Date/Time Occurred: [Redacted - RCMP] 2:12 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted - RCMP] 2:44 PM
Date/Time Closed: [Redacted - RCMP] 5:40 AM
Closed By: hclark

Record Creation Details

Department: Surveillance
Owner: ccarmichael
Operator ID: ccarmichael
Operator Name:
Personnel ID:
Card Number:
Job Position:
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation:

Details of Incident:

Daily Log #: DL20140691996
Type: Gaming
Specific: Unusual Financial Transaction
Category: [Redacted - FINTRAC]
Incident Status: Closed
Synopsis: Mon.40 cd 13 [Redacted - RCMP] B/I \$272, 600.00 (13,630 pcs.) all in \$20's to MDB 18. Using cash counter.
Checklist:

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 2:45 PM	ccarmichael		
Mon.40 cd 13 [Redacted - RCMP]		B/I \$272, 600.00 (13,630 pcs.) all in \$20's to MDB 18. Using cash counter.	

Executive Brief:**Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20140037951****Participants Involved:****Personnel**

Full Name:	GRAY, Duncan	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	CARMICHAEL, Crisanta E	Property:	River Rock (GCC)
Role:	Notified	Department:	Surveillance

Subject

Full Name:	Redacted	Company:	Redacted
Role:	- RCMP		- RCMP
Full Name:	Redacted	Company:	Redacted
Role:	- RCMP		- RCMP

Supplemental Entries:

SP20140103594 Attached by rricher on Redacted - RCMP 15:31

Description At approximately 1402hrs on 28/07/14 subject Redacted - RCMP presented 272.6k in 20's at cd 13 for play on MDB 18. Surveillance conducted a review which shows:

Redacted - RCMP appears to leave Sea Harbour Restaurant at 1358hrs with a black duffel bag Redacted - RCMP proceeds into the casino through the east entrance and uses the Phoenix elevator to the second floor. Nothing unusual is observed in his movements.

1402hrs Redacted - RCMP presents \$272.6k in \$20 bills at cd 13. A count of the funds commences.

1425hrs MDB 18 receives a slip for \$100k Redacted - RCMP is given 19 \$5K chips and 5 \$1k chips. Redacted - RCMP is observed to make significant play following this transaction.

1445hrs MDB 18 receives a slip for \$172.6K Redacted - RCMP is given 34 \$5k chips, 2 \$1k chips, 1 \$500 chip, and 1 \$100 chip Redacted - RCMP is observed to make significant play following this transaction.

Form 86 sent.

Footage saved to Y: Redacted - RCMP SFT/14-37951.sdc

Harrison Richer
65628

SP20140103786 Attached by mhwiebe on Redacted - RCMP 23:13

Description At approximately 17:17 Surveillance was made aware of a large buy in small by SID Redacted - RCMP of 5005 x \$20.00 (\$100,100) for play on MDB 31. A review was done and the following determined;

While playing on MDB 18 with SID Redacted - RCMP receives a phone call. After this Redacted - RCMP leave the table and continues outside the Casino to River road Redacted - RCMP meets a vehicle in the middle of River Road and removes a gift bag Redacted - RCMP returns to MDB 18 and gives the gift bag to Redacted - RCMP Redacted - RCMP takes the bag to CD19 and unloads the bag \$100,100.00. The count was complete at 17:52 and Redacted - RCMP receives his chips at 17:58 (19 x 5k and 5 x 1k).

Footage saved to Y:\SDC\ Redacted - RCMP UFT\14-37951

Reporting Party:**Supervisor:**

Incident File Full Report

Incident File #IN20140037951

SP20140103786 Attached by mhwiebe on [Redacted - RCMP] 23:13

SP2014010378

6 - Continued-

WIEBE
24824

SP20140103834 Attached by mhwiebe on [Redacted - RCMP] 02:17

Description

At approximately 2308 Surveillance was made aware of another buy in by SID [Redacted - RCMP]. He was buying in for \$100,020.00 (4581 x \$20.00 and 300 x \$10.00) for play on MDB 31. A review was done and the following determined;

While playing on MDB 18 [Redacted - RCMP] receives a phone call at 22:49 and leaves the table proceeding to the hotel entrance and onto river Road. He meets the driver of a vehicle that is parked on River road and a package is exchanged. [Redacted - RCMP] immediately returns to the Casino and the phoenix cage and places the contents on the bag (\$100,020.00) onto the counter.

[Redacted - RCMP] count is complete at 23:23 and he receives his chips at 23:28 on MDB 31. He immediately takes the chips to MDB 28 and resumes his play.

Footage saved to Y:\SDC\ [Redacted - RCMP] UFT\14-37951

WIEBE
24824

SP20140103835 Attached by mhwiebe on [Redacted - RCMP] 02:27

Description

At approximately 2345 Surveillance was made aware of another buy in by SID [Redacted - RCMP]. He was buying in for \$200,000.00 (600 x \$50.00 and 1700 x \$100.00) for play on MDB 31. A review was done and the following determined;

While playing on MDB 18 [Redacted - RCMP] receives a phone call at 23:35 and leaves the table proceeding to the hotel entrance and onto river Road. He enters a [Redacted - RCMP] parked in the south hotel driveway, the [Redacted - RCMP] [Redacted - RCMP] leaves and drives [Redacted - RCMP] to the main entrance. [Redacted - RCMP] immediately returns to the Casino and the phoenix cage and places the contents of his bag (\$200,000.00) onto the counter.

[Redacted - RCMP] count is complete at 00:11 and he receives his chips (40 x 5k) at 00:36 on MDB 31. He immediately takes the chips to MDB 28 and resumes his play.

Footage saved to Y:\SDC\ [Redacted - RCMP] UFT\14-37951

WIEBE
24824

SP20140103920 Attached by dgray on [Redacted - RCMP] 08:13

Description

[Redacted - RCMP] 08:13

BCLC- Incident reviewed. Footage viewed.

Redacted - FINTRAC

Reporting Party:

Supervisor:

Printed: 7/30/2020 8:00 AM

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Appendix 4

Incident File Full Report**Incident File #IN20140037951**SP20140103920 Attached by dgray on Redacted - RCMP 08:13SP2014010392
0 - Continued-

Redacted
- FINTRAC

Reporting Party:**Supervisor:**

Printed: 7/30/2020 8:00 AM

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Appendix 4

Incident File Full Report**Incident File #IN20140037951**SP20140103920 Attached by dgray on **Redacted - RCMP** 08:13SP2014010392
0 - Continued-**Redacted -
FINTRAC**D.GRAY,
BCLC Casino InvestigationsSP20140104058 Attached by dgray on **Redacted - RCMP** 14:18

Description

Redacted - FINTRAC

Copies to IPOC, GPEB Investigators ACKLES and BARBER.

D.GRAY,
BCLC Casino Investigations**Reporting Party:****Supervisor:**

Printed: 7/30/2020 8:00 AM

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Appendix 4

Appendix 5

iTrak incident report bearing the Incident File #IN20140048431 (BCLC0016449).

Incident File Full Report

[Incident File #IN20140048431](#)

Record Creation Details

Date/Time Occurred: 9/24/2014 11:19 PM
Day of Week Occurred: Wednesday
Date/Time Created: 9/25/2014 12:05 AM
Date/Time Closed:
Closed By:

Department: Surveillance
Owner: acruz
Operator ID: acruz
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20140887389

Related Incidents: IN20140048453

Type: Gaming

Specific: Unusual Financial Transaction

Category:

Redacted - FINTRAC

Incident Status: Closed

Synopsis:

m 39, 40 | \$500K buy-in (all \$20's) SID #144419 MDB 29 | CD 19 cash counter | CS - Rosa
Large cash buy-in using small denomination SID #144419 WEI, Kesi (\$20 x 25,002 = \$500,040)
1st B/I \$200,000 @ 2335H
2nd B/I \$300,040 @ 0005H
- Section 86 Form

Checklist:

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
9/25/2014 12:05 AM	acruz		
Large cash buy-in using small denomination SID #144419 WEI. Kesi (\$20 x 25,002 = \$500,040) 1st B/I \$200,000 @ 2335H 2nd B/I \$300,040 @ 0005H			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20140048431

Participants Involved:

Personnel

Full Name:	WAKELAND, Jerome	Property:	Vancouver (BCLC)
Role:	Reporter	Department:	BCLC

Subject

Full Name:	TAM, Kwok Chung	Company:	
Role:	Accused		
Full Name:	WEI, Kesi	Company:	Hua Bao Financial Service
Role:	Accused	Company:	
Full Name:	PERSONAL INFO	Company:	work from home
Role:	Patron		
Full Name:	RONG, Jian Qiu	Company:	Yuan Da Science & Tech Dev Co
Role:	Patron		

Supplemental Entries:

SP20140133624 Attached by Iwan on Sep 25, 2014 00:46

Description At 2315 hrs, Surveillance was made aware of a large buy in for WEI Kesi SID 144419 at CD 19.

Review showed WEI appear to run out of chips at MDB 29 at 2252 hrs and answer a phone call at 2307 hrs. The call lasts for 3 mins and WEI exits leaves Salon at 2309 hrs alone. At 2310 hrs, a dark colored SUV (later known as black Mercedes Benz SUV L/P 833NER) arrives and stops at the entrance to east parking lot. WEI gets in the vehicle and the vehicle turns around and leaves the east lot. Vehicle appears to be parking on River Road across from east lot. At 2311 hrs, RONG Jian Qiu SID 16985 exits resort and heads towards east parking lot. Vehicle is seen coming from where it is parked before at 2312 hrs and stopping at the east lot driveway again. RONG gets in the right back seat of the vehicle and it is driven into the east lot and out immediately. Vehicle pulls in resort driveway and stops outside the resort entrance. WEI emerges from the vehicle with a black suitcase and a brown paper bag and returns to salon. RONG gets out of the same vehicle too and follows him back to resort.

License plate 833NER was acquired by during regular scan.

WEI removes two silver plastic bags from the brown shopping bag and unwraps them. Numerous bundles of \$20's are revealed. He then opens the black suitcase, takes many bundles of \$20 out first, and unwraps another two silver plastic bags. Buy in are split into two and the first buy in consists of 10000 x \$20 totaling 200K (it is noted that cage has put down wrong denomination on the first buy in slip for the first time but has changed it later on) and 1500x x \$20 totaling \$300,040 for the 2nd buy in. At 2336 hrs, WEI receives 40 x 5K in chips at MDB 29 and starts to put substantial amount at risk. At 0010 hrs, WEI gets 60 x 5K, 1 x \$25, & 3 x \$5 at MDB 29. He counts out some 5K chips and moves to MDB 25 where he continues to play. RONG is seen sitting at the same table.

2nd buy in:

Reporting Party:

Supervisor:

SP20140133624 Attached by Iwan on Sep 25, 2014 00:46

SP2014013362

4 - Continued-

At 0101 hrs, WEI appears to have lost all of chips and answers a phone call at MDB 53. At 0102 hrs, BAO Bo SID 28212 is seen passing chips to WEI and WEI loses them too (please see RRCR 14-48453 for chip pass). At 0104 hrs, WEI leaves Phoenix Room and talks to RONG Jian Qiu SID 16985 briefly when he walks by MDB 28. He then exits Salon and goes down resort lobby. He is seen talking on the phone and walking to River Road near east parking lot. A light colored SUV is parked on River Road and two Asian males meet up with WEI, one of them strongly resembles BCLC barred TAM Kwok SID 67600. They all get in the vehicle and it is driven into resort driveway. Vehicle is confirmed to be a silver Range Rover L/P 718TTR and it stops at the resort entrance. Unknown male emerges from the driver seat of vehicle and opens the trunk. WEI gets off the vehicle too and picks up a black suitcase from unknown male at 0108 hrs. WEI enters salon and empties the suitcase in cage lounge. He removes 4 silver plastic bags from it and unwraps them. PERSONAL INFO SID 131020 enters cage lounge too and joins WEI. Buy in is split into two and the first buy in consists of 15000 x \$20 totaling 300K & 19 x \$10 & 9992 x \$20 totaling \$200,030 for the 2nd buy in. It is noted that there are 4 x US\$20 including in the 2nd buy in and they are exchanged to CAD\$84.80 and \$4.80 is put in tip box. At 0204 hrs, WEI receives 40 x 5K, 1 x \$25, & 1 x \$5 at MDB 29 for his 2nd buy in and he continues to play.

Form 86 sent.

Footage saved to Y/SEP/UFT/14-48431.sdc

L WAN
25549

SP20140133768 Attached by jewakeland on Sep 25, 2014 09:08

Description

Redacted - FINTRAC

The incidents reported by site staff are supported by reviewed reports and footage.

Redacted - FINTRAC

As a Real Estate Developer it is unusual for WEI to have access to this number of small denomination bills.

During the course of gaming play, WEI received chips from two well-known patrons, Qi Li and Bo BAO. WEI has a history of conducting shared play with other patrons in the VIP Salon. These transactions do not appear to have any elements of commerciality, and do not meet the criteria for a separate suspicious transaction report to be submitted to FINTRAC.

WEI obtained the funds for the two large cash buy-ins from two different vehicles that he met just outside the River Rock Casino. Both meetings occurred in the late-night/early morning hours, well outside normal business hours for legitimate banking operations.

Reporting Party:

Supervisor:

SP20140133768 Attached by jewakeland on Sep 25, 2014 09:08

SP2014013376

8 - Continued-

WEI has a Patron Gaming Fund account which he has used extensively. It is unusual for WEI to conduct a large buy-in using a mix of small denomination bills when he has used the PGF account, which is a verified source of funds, in the past.

J. WAKELAND

BCLC Investigator

SP20140134263 Attached by jewakeland on Sep 26, 2014 10:46

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 8/2020 12:45 PM

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Appendix 5

BCLC0016449.04

SP20140134263 Attached by jewakeland on Sep 26, 2014 10:46

SP2014013426

3 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 8/2020 12:45 PM

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Appendix 5

BCLC0016449.05

SP20140134263 Attached by jewakeland on Sep 26, 2014 10:46

SP2014013426

3 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 8/2020 12:45 PM

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Appendix 5

BCLC0016449.06

SP20140134263 Attached by jewakeland on Sep 26, 2014 10:46

SP2014013426

3 - Continued-

Redacted
- FINTRAC

J. WAKELAND

BCLC Casino Security Investigator

Reporting Party:

Supervisor:

Printed: 10/ 8/2020 12:45 PM

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Appendix 5

BCLC0016449.07

List of Attached Forms:

Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 6

Section 86 report bearing the occurrence number IN-15-09625 – SFT
(GCGC_PROD_0044306).



Gaming Policy and Enforcement Investigations and Regional Operations Division

SECTION 86 G C ACT REPORT

To be submitted without delay.

CONFIDENTIAL

This document is the property of Investigations and Regional Operations Division, Gaming Policy and Enforcement, is confidential and shall not be disclosed or divulged, in whole or in part, without prior consent of the Investigations and Regional Operations Division, Gaming Policy and Enforcement.

Date: February 21, 2015

Service Provider: GCC

Location: RRCR - 8811 River RD, Richmond B.C.

Occurrence: IN-15-09625 – SFT

Date & Time of Occurrence: February 21, 2015 at 10:50hrs.

Details: PERSONAL INFORMATION (SID: 107757) bought-in for \$185,005 – 2,399 x \$5, 1 x \$10, 7,300 x \$20, 520 x \$50 and 10 x \$100.

Police Called: Yes ☐ No ☐

Attended: Yes ☐ No ☐

Police Force:

File Number:

Investigating Officer(s) & Badge Number(s):

Submitted by: River Rock Surveillance

GPEB Registration # : 61729

E-Mail PERSONAL INFORMATION

Appendix 7

iTrak incident report bearing the Incident File #IN20150010937 (BCLC0015363).

Incident File Full Report

Commission of Inquiry into Money Laundering in British Columbia

Incident File #IN20150010937

Date/Time Occurred: [Redacted - RCMP] 10:26 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted - RCMP] 11:18 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Gaming Operations
Owner: annchu
Operator ID: lufigueroa
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20150195463
Type: Gaming
Specific: Unusual Financial Transaction
Category: [Redacted - FINTRAC]
Incident Status: Closed
Synopsis: M415, Milestone 3400 Cash counter used for \$200K B/I mostly in \$20's SID [Redacted - RCMP] CD19 to MDB19 C/S Joanne
Checklist: - Section 86 Form

**Redacted -
FINTRAC**

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 11:18 PM	lufigueroa		

M415, Milestone 3400 Cash counter used for \$200K B/I mostly in \$20's (\$20's x 6,499 pieces \$100's x 700 pieces \$10 x 2 pieces) SID [Redacted - RCMP] CD19 to MDB19 C/S Joanne

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Commission of Inquiry into Money Laundering in British Columbia

Incident File #IN20150010937**Participants Involved:****Personnel**

Full Name: BEEKSMA, Steve

Property: Vancouver (BCLC)

Role: Documenter

Department: BCLC

Subject

Full Name:

Company: Edgewater Casino

Role:

Full Name:

Company:

Role:

**Redacted
- RCMP**

Full Name:

Company:

Role:

Redacted - RCMP**Supplemental Entries:**SP20150030371 Attached by dtrajkovic on **Redacted - RCMP** 01:36**Description**

At approx. 22:11 SID # **Redacted - RCMP** came in front of hotel in a cab. Cab driver opened the trunk and three large suitcases were taken out. **Redacted - RCMP** was moving two and **Redacted - RCMP** carried smaller red shopping bag. **Redacted - RCMP** went to west tower, 7th floor, and entered a room. At 22:19 **Redacted - RCMP** and **Redacted - RCMP** left the room. **Redacted - RCMP** had red shopping bag inside another (white) bag now. **Redacted - RCMP** went to reception and proceeded to Salon. **Redacted - RCMP** presented 2x\$10, 6499x\$20 and 700x\$100 bills for \$200,000 buy in. Transaction was completed at MDB 31 where **Redacted - RCMP** received 40x\$5K chips and continued to play. Video saved in M:...week3/UFT/15-10937. Form 86 sent.

Djordje TRAJKOVIC
23474

SP20150031709 Attached by sbeeksma on **Redacted - RCMP** 10:53**Description**

**Redacted
- FINTRAC**

Reporting Party:**Supervisor:**

Printed: 7/30/2020 7:17 AM

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BCLC0015363.02

SP20150031709 Attached by sbeeksma on Redacted - RCMP 10:53

SP2015003170

9 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 7/30/2020 7:17 AM

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Appendix 7

BCLC0015363.03

Incident File Full Report

Commission of Inquiry into Money Laundering in British Columbia

[Incident File #IN20150010937](#)

SP20150031709 Attached by sbeeksma on [Redacted - RCMP] 10:53

SP2015003170
9 - Continued-

S.BEEKSMA
BCLC
Casino Investigations

SP20150031782 Attached by sbeeksma on [Redacted - RCMP] 12:33

Description

Redacted - FINTRAC

GPEBS BARBER and ACKLES cc'd on email to RCMP Combined Forces.

S.BEEKSMA
BCLC
Casino Investigations

Reporting Party:

Supervisor:

Printed: 7/30/2020 7:17 AM

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Appendix 7

BCLC0015363.04

List of Attached Forms:

Prefix

Form Name

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 8

iTrak incident report bearing the Incident File #IN20150018549 (BCLC0015368).

Incident File Full Report**Incident File #IN20150018549****Date/Time Occurred:** [Redacted] 53 PM**Day of Week Occurred:** [Redacted] - RCMP**Date/Time Created:** [Redacted] 27 PM**Date/Time Closed:****Closed By:****Record Creation Details****Department:** Surveillance**Owner:** sroddick**Operator ID:** sroddick**Operator Name:****Personnel ID:****Card Number:****Job Position****Secondary Operator:****Location of Incident:****Property:** River Rock (GCC)**Location:** Back of House-River Rock (GCC)**Sublocation:** VIP Cash Cage**Details of Incident:****Daily Log #:** DL20150331133**Type:** Gaming**Specific:** Unusual Financial Transaction**Category:** [Redacted] - FINTRAC**Incident Status:** Closed**Synopsis:** SID [Redacted] - RCMP B/I \$ 300K (in \$ 20s) to MDB 17. C 3400 and M 414**Checklist:** - Section 86 Form**[Redacted] - FINTRAC****Narrative:****Created On****Created By****Modified On****Modified By**

[Redacted] - RCMP 6:27 PM sroddick

SID [Redacted] - RCMP - \$ 300K B/I (12000 x \$ 20s) \$ 240K and (600 x \$ 100s) \$ 60K @ Cd 19. To MDB 17

Executive Brief:**Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20150018549****Participants Involved:****Personnel**

Full Name:	BEEKSMA, Steve	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	JANKOVIC, Dejan	Property:	River Rock (GCC)
Role:	Documenter	Department:	Surveillance

Subject

Full Name:		Company:	
Role:			
Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:			
Full Name:		Company:	
Role:			

Supplemental Entries:

SP20150051853 Attached by djankovic on Redacted - RCMP 18:33

Description At approximately 1750hrs surveillance was informed of a large buy in for Redacted - RCMP. Review showed following:

- 1745hrs Redacted - RCMP is dropped off on P3 south parkade in a Redacted - RCMP. Driver opens up the trunk and Redacted - RCMP and him approach it and Redacted - RCMP is seen walking away with a black gym bag. Driver gets back into vehicle and drives off. Redacted - RCMP
- 1748hrs Redacted - RCMP is at CD 19 presenting money out of bag. Buy in consisted out of 12000x\$20 600x\$100 bills.
- 1857hrs Redacted - RCMP receives chips on MDB 17 and continues gaming.

Footage saved onto Y and M drive/Apr/UFT/15-18549.

Dejan JANKOVIC
GPEB # 24617

SP20150051904 Attached by djankovic on Redacted - RCMP 21:32

Description At 2250hrs surveillance was informed that Redacted - RCMP was buying in once again with large amount of bills at CD 19. Buy in consisted out of 15000x\$20 bills.

Redacted - RCMP leaves MDB 72 at 2046hrs and leaves approximately 155K in chips on the table. At 2048hrs Redacted - RCMP is seen meeting Redacted - RCMP and collecting the black bag. Redacted - RCMP then proceeds to salon and at 2250hrs is presenting bills out of the bag.

Further review showed money (bag) being brought by Redacted - RCMP at 2042hrs Redacted - RCMP is dropped off in the valet area in a Richmond cab. Redacted - RCMP leaves the cab carrying a large black bag that appears to be full and heavy. Redacted - RCMP goes to 3rd floor concourse and sits in the one of the chairs. After Redacted - RCMP collected the bag Redacted - RCMP stays behind on concourse and talks to another Redacted - RCMP. At 2251hrs Redacted - RCMP enters salon as well.

At 2132hrs Redacted - RCMP receives chips on MDB 24 and plays on MDB 23. Also at 2131hrs Redacted - RCMP collected 155K from MDB 72 and took them to MDB 23.

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20150018549**

SP20150051904 Attached by djankovic on [Redacted - RCMP] 21:32

SP2015005190

4 - Continued-

Footage added into existing folder. Form 86 updated.

Dejan JANKOVIC
GPEB # 24617

SP20150052148 Attached by mhwiebe on [Redacted - RCMP] 10:42

Description Correction the BCLP associated to the 1st drop off is 603MMK.

Additional footage of the drop off was saved included [Redacted] speaking with SID [Redacted - RCMP] [Redacted] after the drop off.

Footage requested by GPEB BARBER, Rob. All available footage burned to [Redacted -] Sealed in [Redacted - RCMP] and placed in the evidence locker. Traka and evidence locker accessed by WIEBE.

Footage picked up on Friday [Redacted - RCMP] by GPEB BARBER, Rob.

Additional footage saved to M:\RRSurv [Redacted - RCMP] 15-18549

WIEBE
24824

SP20150054544 Attached by sbeeksma on [Redacted - RCMP] 14:16

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 7/30/2020 7:03 AM

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Appendix 8

Incident File Full Report**Incident File #IN20150018549**SP2015005454 Attached by sbeeksma on **Redacted - RCMP** 14:16SP2015005454
4 - Continued-

Redacted
- FINTRAC

Reporting Party:**Supervisor:**

Printed: 7/30/2020 7:03 AM

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Appendix 8

Incident File Full Report**Incident File #IN20150018549**

SP2015005454 Attached by sbeeksma on Redacted - RCMP 14:16

SP2015005454

4 - Continued-

Redacted - FINTRAC

Redacted is on BCLC's list of High Risk Profile Patrons (HRPP) and will continue to be monitored when attending BC Casinos with reports escalated as deemed necessary.

S.BEEKSMA
BCLC
Casino Investigations

SP2015005454 Attached by sbeeksma on Redacted - RCMP 14:17

Description

Redacted - FINTRAC

GPEBS BARBER and ACKLES cc'd on email to RCMP Combined Forces.

S.BEEKSMA
BCLC
Casino Investigations

Reporting Party:**Supervisor:**

Printed: 7/30/2020 7:03 AM

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Appendix 8

Incident File Full Report**Incident File #IN20150018549****List of Attached Forms:****Prefix****Form Name****Redacted - FINTRAC****Reporting Party:****Supervisor:**

Printed: 7/30/2020 7:03 AM

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Appendix 9

iTrak incident report bearing the Incident File #IN20150021066 (BCLC0015376).

Incident File Full Report**Incident File #IN20150021066**

Date/Time Occurred: 4/21/2015 6:05 PM
Day of Week Occurred: Tuesday
Date/Time Created: 4/21/2015 6:07 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Gaming Operations
Owner: wesmak
Operator ID: ssutherland
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Villa Casino (GC)
Location: Back of House-Villa Casino (GC)
Sublocation: Cash Cage

Details of Incident:

Daily Log #: DL20150375194
Related Incidents: IN20150021129
Reference: M23
Type: Gaming
Specific: Unusual Financial Transaction

Category:**Redacted - FINTRAC****Incident Status:** Closed**Synopsis:** PERSONAL INFORMATION (SID#141503) bought in for \$50,000 in small denomination bills; received chips at MDB8**Checklist:** - Section 86 Form**Redacted - FINTRAC****Narrative:**

Created On	Created By	Modified On	Modified By
------------	------------	-------------	-------------

4/21/2015 6:07 PM	ssutherland		
-------------------	-------------	--	--

PERSONAL INFORMATION (SID#141503) bought in for \$50,000 in small denomination bills**Executive Brief:****Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20150021066****Participants Involved:****Personnel**

Full Name:	NORGAARD, Brandon	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	MAENG, Youn	Property:	Villa Casino (GC)
Role:	Info From	Department:	Cage
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	NICULESCU, Alexander Marian	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance
Full Name:	SUTHERLAND, Scott	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION	Company:	Fa Men Limited Company in China
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	
Role:	Patron		
Full Name:	LI, Qi	Company:	Edgewater Casino
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	Yin Ying Investment Co
Role:	Patron		

Supplemental Entries:

SP20150058819 Attached by ssutherland on Apr 21, 2015 19:40

Description On above mentioned date at approximately 18:05 hrs Surveillance was informed by Cashier Supervisor Youn MAENG that patron PERSONAL INFORMATION was buying in at CD15 for \$50,000 in \$20 bills.

Subsequently, Surveillance began to live monitor and review PERSONAL INFORMATION activities while on site and the following was observed:

At approximately 17:44 hrs patron Qi LI arrives in the valet loop in front of the Delta hotel in a yellow taxi cab and proceeds into the hotel lobby in possession of a white plastic bag which she eventually places on one of the couches in the lobby before sitting in the adjacent chair.

At approximately 17:59 hrs PERSONAL INFORMATION arrives in the North parkade in a Silver Lexus SUV, BCLP: 807 SXL which she proceeds to park on the P2 level before proceeding into the Delta hotel lobby where she immediately proceeds towards the couches where LI was seated.

Once there, PERSONAL INFORMATION picks up the white bag that LI had placed on the couch and, after looking at the contents of the bag, both LI and PERSONAL INFORMATION proceed into the casino through the main door entrance and continue up to the Cypress room where PERSONAL INFORMATION approaches CD15 and begins to remove multiple bundles of \$20 bills which were tightly wrapped with elastic bands and places them on the counter to be processed as a buy in.

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20150021066**

SP20150058819 Attached by ssutherland on Apr 21, 2015 19:40

SP2015005881

9 - Continued-

At the completion of transaction, Surveillance was informed by MAENG that the total buy in was for \$50,000 (249x\$20 CDN, 1x\$20 USD) and that [REDACTED] would be receiving her chips at MDB8.

At 18:18 hrs [REDACTED] receives \$50,000 in gaming chips (\$5000x6, \$1000x20) at MDB8 and commenced her play wagering between \$1000 - \$6000 a hand while LI remained seated at the table with [REDACTED] but did not engage in any gaming or conduct any buy ins.

At 21:50 hrs [REDACTED] was still playing at MDB8 and was holding \$40,000 in gaming chips.

Applicable footage has been saved in: EXPORTS/APR15/GPEB/Unusual financial transaction/IN21066

END OF REPORT.

SP20150058952 Attached by aniculescu on Apr 22, 2015 04:40

Description Surveillance continued to monitor [REDACTED] gaming until she lost the remainder of her chips at MDB08 at approximately 03:56 hrs. Her associate, Qi LI was then observed buying in for \$5,00 and resumed gaming.

Alex NICULESCU
GPEB#50762

END OF REPORT

SP20150058992 Attached by brnorgaard on Apr 22, 2015 07:08

Description April 22, 2015 - Incident noted and reviewed.

I will be making arrangements with Surveillance to review available footage.

I have reviewed available footage with SU/M AVRAM. Footage supports what the site has reported.

Redacted
- FINTRAC

Reporting Party:**Supervisor:**

Printed: 7/30/2020 6:49 AM

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Incident File Full Report**Incident File #IN20150021066**

SP20150058992 Attached by brnorgaard on Apr 22, 2015 07:08

SP2015005899

2 - Continued-

Redacted
- FINTRAC

Brandon Norgaard
BCLC Casino Investigator
215001

SP20150059055 Attached by brnorgaard on Apr 22, 2015 10:23

Description

Redacted
- FINTRAC

Reporting Party:**Supervisor:**

Printed: 7/30/2020 6:49 AM

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Appendix 9

Incident File Full Report**Incident File #IN20150021066**

SP20150059055 Attached by brnorgaard on Apr 22, 2015 10:23

SP2015005905

5 - Continued-

Redacted
- FINTRAC

Reporting Party:**Supervisor:**

Printed: 7/30/2020 6:49 AM

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Incident File Full Report**Incident File #IN20150021066**

SP20150059055 Attached by brnorgaard on Apr 22, 2015 10:23

SP2015005905

5 - Continued-

Redacted - FINTRAC

Brandon Norgaard
BCLC Casino Investigator
215001

SP20150059072 Attached by brnorgaard on Apr 22, 2015 11:09

Description April 22, 2015 - After further research, it appears as if VILLA15-21129 is **PERSONAL INFORMATION** (SID: 166297).

PERSONAL INFO has since been added as a participant to this file.

Brandon Norgaard
BCLC Casino Investigator
215001

Reporting Party:**Supervisor:**

Printed: 7/30/2020 6:49 AM

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Appendix 9

Incident File Full Report**Incident File #IN20150021066****List of Attached Forms:****Prefix****Form Name****Redacted - FINTRAC****Reporting Party:****Supervisor:**

Printed: 7/30/2020 6:49 AM

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Appendix 10

iTrak incident report bearing the Incident File #IN20180029122 (BCLC0015875).

Incident File Full Report

[Incident File #IN20180029122](#)

Record Creation Details

Date/Time Occurred: 5/10/2018 2:42 PM
Day of Week Occurred: Thursday
Date/Time Created: 5/10/2018 3:23 PM
Date/Time Closed:
Closed By:

Department: Surveillance
Owner: Irezek
Operator ID: Irezek
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20180440133
Type: Gaming
Specific: Unusual Financial Transaction
Category: **Redacted - FINTRAC**
Incident Status: Closed
Synopsis: SID#243210 B/I \$9.8K to MDB 24 (250X\$20's/96X\$50's)
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
5/10/2018 3:23 PM	Irezek		
SID#243210 B/I \$9.8K to MDB 24 (250X\$20's/96X\$50's)			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029122

Participants Involved:

Personnel

Full Name:	BEEKSMA, Steve	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	PERSONAL INFORMATION	Company:	Jie Shi Garment Co. Ltd.
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	Da Chong Nan Min Furniture LTD.
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	1032682 BC Ltd
Role:	Patron		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
PERSONAL INFORMATION	Watch	12/ 5/2018	Permanent

Type Of Ban:

Notes:

Reason For Ban:

Identification:

Supplemental Entries:

SP20180080892 Attached by Iwan on May 10, 2018 15:45

Description Surveillance observed a 9.8K buy-in in \$50's & \$20's on MDB 24 for SID 243210 PERSONAL INFORMATION and bills were held by elastic bands. An UFT was opened due to small denominations used.

Review showed PERSONAL INFORMATION arrive in a red Porsche SUV bearing BC L/P FB220X driven by SID 69755 PERSONAL INFORMATION at 1421 hrs. SID 69753 PERSONAL INFORMATION drove another BMW sedan bearing L/P GA725X following them and parked across where they parked. PERSONAL INFORMATION exited first and headed to Salon followed PERSONAL INFORMATION & PERSONAL INFORMATION entered Salon followed PERSONAL INFORMATION & PERSONAL INFORMATION got in the men's room and PERSONAL INFORMATION & PERSONAL INFORMATION were watching the game on MDB 24. At 1426 hrs, PERSONAL INFORMATION exited the men's room and joined PERSONAL INFORMATION & PERSONAL INFORMATION on MDB 24. Gaming manager TAN was seen talking to them. PERSONAL INFORMATION took a brick of bills out from his jacket left pocket and the bills were held by multiple elastic bands. He placed the brick on the table on spot 9 on MDB 24 and counted out 4 x \$50's from the brick and put them in his wallet at 1431 hrs. PERSONAL INFORMATION also took out a bundle of \$100's from his jacket pocket that was held by a white bank strap; removed 2 x \$100's from the bundle; pocketed them and bought in with the rest of the bills. PERSONAL INFORMATION received his chips and started to play.

At 1437 hrs, PERSONAL INFORMATION took his brick from MDB 24 to CD 19 for buy-in. Bills were comprised of 250 x \$20's & 96 x \$50's totaling 9.8K. He received his buy-in chips on MDB 24 at 1457 hrs and started playing.

Reporting Party:

Supervisor:

SP20180080892 Attached by lwan on May 10, 2018 15:45

SP2018008089

2 - Continued-

Form 86 sent.

Footage M/MAY/SFT/18-29122

L WAN

25549

SP20180083167 Attached by sbeeksma on May 14, 2018 14:16

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

SP20180083167 Attached by sbeeksm on May 14, 2018 14:16

SP2018008316

7 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:08 AM

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Appendix 10

BCLC0015875.04

SP20180083167 Attached by sbeeksma on May 14, 2018 14:16

SP2018008316

7 - Continued-

Redacted
- FINTRAC

S.BEEKSMA

BCLC – AML Investigations

Reporting Party:

Supervisor:

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 11

iTrak incident report bearing the Incident File #IN20180029146 (BCLC0015876).

Incident File Full Report

Incident File #IN20180029146

Record Creation Details

Date/Time Occurred: 5/10/2018 4:47 PM
 Day of Week Occurred: Thursday
 Date/Time Created: 5/10/2018 5:09 PM
 Date/Time Closed: 5/14/2018 9:33 AM
 Closed By: stolee

Department: Gaming Operations
 Owner: alaw
 Operator ID: lwan
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location:
 Sublocation:

Details of Incident:

Daily Log #: DL20180440515
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: PERSONAL INFORMATION \$10K cash buy in at cage CD 19 RRWS13 M-02
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
5/10/2018 5:09 PM	lwan		
SOF refusal... PERSONAL INFORMATION - \$10K cash buy in at cage RRWS13 M-02			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029146

Participants Involved:

Personnel

Full Name:	TAN, Sandra Claudia	Property:	River Rock (GCC)
Role:	Documenter	Department:	Tables
Full Name:	CHEUNG, Ching Yee Pauliana	Property:	River Rock (GCC)
Role:	Documenter	Department:	Cage

Subject

Full Name:	PERSONAL INFORMATION	Company:	Yao's Garment Factory
Role:	Patron		

Supplemental Entries:

SP20180080922 Attached by sandratan on May 10, 2018 17:19

Description On the gaming date May 10, 2018 at approximately 17:00, I was informed by C/S Pauliana that [PERSONAL INFORMATION] attempted to buy in 10K cash at CD 19. I approached [PERSONAL INFORMATION] and requested for SOF but she stated she does not have a receipt for 10K. SOF was explained to her and she decided to use debit card buy in. Cash was returned to her.

Gaming Manager
TAN, Sandra GPEB#54743

SP20180080957 Attached by lwan on May 10, 2018 18:33

Description New SID 243315 [PERSONAL INFORMATION] attempted to buy in 10K but was declined due to no receipt as per G/M TAN.

Review showed [PERSONAL INFORMATION] approach CD 19 and take a brick of \$20's and \$50's out from her purse at 1628 hrs. She placed her bills on the counter of CD 19; counting out few \$50's and putting them back in her purse. The brick was held by elastic bands.

Bills were comprised of 260 x \$20's and 96 x \$50's totaling 10K. Her buy-in was declined due to no receipt was produced.

Form 86 sent.

Footage M/MAY/SOF refusal/18-29146

L WAN
25549

SP20180081052 Attached by pcheung on May 10, 2018 23:19

Description Approx. 16:40hrs on May 10, 2018 patron [PERSONAL INFORMATION] SID 243315 was attempting to do table buy in with her \$50 and \$20 dollars bills. She told cashier Ruby that the total buy in amount to \$9,800. In fact, it was in total of \$10,000 after actual count and patron was unable to provide receipt for those money. Transaction was denied, both Surveillance and Floor Manager Sandra TAN 54743 are informed.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029146

SP20180081052 Attached by pcheung on May 10, 2018 23:19

SP2018008105

2 - Continued-

Pauliana CHEUNG
Cage Supervisor
23873

SP20180081176 Attached by stolae on May 11, 2018 06:38

Description May/11/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as [PERSONAL INFORMATION] (SID#243315) was unable to produce a receipt to source a \$10,000 buy-in that put her over \$10,000 for the gaming session as such the transaction was refused.

Although [PERSON] was attempting to buy-in with no receipt is does not make the cash she attempted to use or these circumstances suspicious.

A review of [PERSON] subject profile was done, [PERSON] appears to be new to the BC casinos as she have no prior history nor LCTR on file.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSON] or the funds she attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE
BCLC Investigator

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20180029146](#)

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:07 AM

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Appendix 11

Appendix 12

iTrak incident report bearing the Incident File #IN20180029582 (BCLC0015877).

Incident File Full Report

Incident File #IN20180029582

Record Creation Details

Date/Time Occurred: 5/12/2018 1:53 PM
Day of Week Occurred: Saturday
Date/Time Created: 5/12/2018 2:13 PM
Date/Time Closed: 5/17/2018 9:42 AM
Closed By: sbondesen

Department: Surveillance
Owner: ralebrun
Operator ID: ralebrun
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Parq Casino
Location: Casino Level 2
Sublocation: KBBJ 109

Details of Incident:

Daily Log #: DL20180447023
Reference: WS02
Type: Gaming
Specific: Unusual Financial Transaction
Category: **Redacted - FINTRAC**
Incident Status: Closed
Closing Remarks: SB
Synopsis: SID#235285 **PERSONAL INFORMATION** conducted a cash buy in for \$9,500 all in \$20 bills.
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
5/12/2018 2:13 PM	ralebrun		
SID#235285 PERSONAL INFORMATION conducted a cash buy in for \$9,500 all in \$20 bills.			

Executive Brief:

Reporting Party:

Supervisor:

Commission of Inquiry into Money Laundering in British Columbia

Incident File Full Report

Incident File #IN20180029582

Participants Involved:

Personnel

Full Name:	LEBRUN, Randall	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	BONDESEN, Sheila	Property:	Villa Casino (GC)
Role:	Documenter	Department:	BCLC
Full Name:	GHAJ, Ajay Krishan	Property:	Parq Casino
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	SEIF DOKHT TEHRANI, Massoud	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION	Company:	Wu Zhe Dong Fang
Role:	Accused		

Supplemental Entries:

SP20180081904 Attached by ralebrun on May 12, 2018 14:19

Description on 2018-MAY-12, surveillance was informed by GHAI, Ajay Casino Floor Manager that SID#235285 PERSONAL INFORMATION conducted a cash buy in for \$9,500 all in \$20 bills. PERSONAL average bet is approximately \$75 being played on MEZB511. PERSONAL then goes to patio.

Surveillance conducted a review and found the following:

13:46hrs PERSONAL conducts a cash buy in of \$9,500 in \$20 bills on KBBJ109. Pulls a brick of \$20 bills from his left jacket pocket wrapped in elastic bands and receives 18x \$500 chips and 5x \$100 chips.

Further review pending.

LEBRUN, Randall
81424

SP20180081925 Attached by bso on May 12, 2018 15:24

Description On 2018-MAY-12 surveillance conducted further review for IN20180029582, all times are approximate.

13:35 PERSONAL is seen taking Elevator #16 from and unknown hotel floor to L1 for a smoke.

13:38 PERSONAL is seen entering the casino via main entrance and takes escalators onto L2 gaming floor.

PERSONAL play was monitored briefly and his average bet is approximately \$500. As of 15:15 PERSONAL is currently actively playing.

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:09 AM

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Appendix 12

BCLC0015877.02

Incident File Full Report

Incident File #IN20180029582

SP20180081925 Attached by bso on May 12, 2018 15:24

SP2018008192

5 - Continued-

section 86 sent to GPEB

footage saved under incident number in "unusual financial transaction" folder

bso

85036

SP20180081940 Attached by msdtehrani on May 12, 2018 15:49

Description

Related footage is transferred to BCLC network drive under Incident number.

Massoud TEHRANI. 42164.

SP20180084261 Attached by bso on May 16, 2018 14:29

Description

On 2018-MAY-16 a further review was requested, writer did the review and it shows that on 2018-MAY-13 at approximately 03:25 SID #235285 **PERSONAL INFORMATION** takes Douglas elevator #17 to level 12.

bso

85036

SP20180084706 Attached by sbondesen on May 17, 2018 09:39

Description

Cross-reference IN20180029582, IN20180029809, and IN20180030008 **Redacted - FINTRAC****Redacted - FINTRAC**

Reporting Party:

Supervisor:

Appendix 13

iTrak incident report bearing the Incident File #IN20180029809 (BCLC0015878).

Incident File Full Report

[Incident File #IN20180029809](#)

Record Creation Details	
Date/Time Occurred:	5/13/2018 4:08 PM
Day of Week Occurred:	Sunday
Date/Time Created:	5/13/2018 4:37 PM
Date/Time Closed:	5/17/2018 9:42 AM
Closed By:	sbondesen
Department:	Surveillance
Owner:	wepeterson
Operator ID:	wepeterson
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property: Parq Casino
 Location: BOH Level 3
 Sublocation: Cage - Salon West

Details of Incident:

Daily Log #: DL20180450795
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: **Redacted - FINTRAC**
 Incident Status: Closed
 Closing Remarks: SB
 Synopsis: SID#235285 **PERSONAL INFORMATION** bought in for \$5,000 (all in 20s) at CD13, CPV to MDB309.
 Checklist: - Section 86 Form
 Narrative:

Created On	Created By	Modified On	Modified By
5/13/2018 4:37 PM	wepeterson		
SID#235285 PERSONAL INFORMATION	bought in for \$5,000 (all in 20s) at CD13, CPV to MDB309.		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029809

Participants Involved:

Personnel

Full Name:	BONDESEN, Sheila	Property:	Villa Casino (GC)
Role:	Documenter	Department:	BCLC
Full Name:	PETERSON, Wesley	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	VILLAGOMEZ, Teresita	Property:	Parq Casino
Role:	Info From	Department:	Cage
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	SEIF DOKHT TEHRANI, Massoud	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION	Company:	Wu Zhe Dong Farig
Role:	Info From		
Police Contacted:	Taken From Scene:	Police Contacted Result :	

Supplemental Entries:

SP20180082467 Attached by wepeterson on May 13, 2018 16:40

Description On MAY-13-2018 at approximately 16:05hrs, Surveillance was informed by Cage Supervisor Teresita VILLAGOMEZ regarding a small denomination buy in taking place at CD13. According to VILLAGOMEZ, PERSONAL INFORMATION (SID#235285) was buying in at CD13 for a CPV to MDB309.

At 16:11hrs, PERSONAL proceeds to sit at MDB309 spot 1. After sitting down, PERSONAL reaches into his pocket and pulls out 3x\$5,000 chips. One is placed onto the layout and colored down by the dealer into 3x\$1000 chips, 18x\$100 chips and 8x\$25 chips. PERSONAL collects his colored down chips and begins to play \$100 on banker/player and \$25 on dragon7/panda8.

At 16:19hrs, PERSONAL CPV for \$5,000 arrives at the table. He is given 5x\$1,000 chips for his cash at the cage.

From the time PERSONAL begins playing until 1738hrs, his wagers range from \$100 up to \$700 on banker/player and then \$25 to \$75 per hand on the dragon7/panda8 bonuses. At 1738hrs, PERSONAL begins to play as high as \$1,800 on banker/player. His average bet up to this point is approx. \$500.

At 17:50:56hrs PERSONAL colors up \$15,000 of his \$18,000 bankroll into 3x\$5,000 chips and leaves the table to go eat, by himself, in Salon 305.

At 18:13:57hrs PERSONAL returns to play at MDB309. He chips in with his chips from previously.

PERSONAL is actively playing and staying at the hotel.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029809

SP20180082467 Attached by wepeterson on May 13, 2018 16:40

SP2018008246

7 - Continued-

A review was done to determine how [PERSONAL] arrived on site:

At 16:00:22 [PERSONAL] who is alone, enters the main entrance of the casino and rides the main escalator up. [PERSONAL] walked on site from the Expo Blvd. and Smythe St. direction.) Once inside, [PERSONAL] proceeds to the East Salon to buy in.

Footage has been saved under: NAZ / UFT / IN201800029809

Form 86 Sent

END OF REPORT

Wes PETERSON
86310

SP20180082861 Attached by jluu on May 14, 2018 09:07

Description Footage transported to BCLC shared drive

JLUU
73763

SP20180084707 Attached by sbondesen on May 17, 2018 09:41

Description Cross-reference IN20180029582, IN20180029809, and IN20180030008 [Redacted - FINTRAC]
[Redacted - FINTRAC]

Reporting Party:

Supervisor:

Appendix 14

iTrak incident report bearing the Incident File #IN20180030008 (BCLC0015879).

Incident File Full Report

[Incident File #IN20180030008](#)

Record Creation Details	
Date/Time Occurred:	5/14/2018 2:08 PM
Day of Week Occurred:	Monday
Date/Time Created:	5/14/2018 2:23 PM
Date/Time Closed:	
Closed By:	
Department:	Surveillance
Owner:	msdtehrani
Operator ID:	msdtehrani
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property: Parq Casino
Location: Casino level 3
Sublocation: MEZB 309

Details of Incident:

Daily Log #: DL20180453669
Reference: ws6
Type: Gaming
Specific: Unusual Financial Transaction
Category: **Redacted - FINTRAC**
Incident Status: Closed
Synopsis: SID#235285 **PERSONAL INFORMATION** bought in for \$5,000 (all in 20s) at CD13, CPV to MDB309.
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
5/14/2018 2:23 PM	msdtehrani		
SID#235285 PERSONAL INFORMATION bought in for \$5,000 (all in 20s) at CD13, CPV to MDB309.			

Executive Brief:

Reporting Party:

Supervisor:

Commission of Inquiry into Money Laundering in British Columbia

Incident File Full Report

Incident File #IN20180030008

Participants Involved:

Personnel

Full Name:	BONDESEN, Sheila	Property:	Villa Casino (GC)
Role:	Documenter	Department:	BCLC
Full Name:	SEIF DOKHT TEHRANI, Massoud	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	DE VERA, Maridel	Property:	Parq Casino
Role:	Info From	Department:	Cage
Police Contacted:	Taken From Scene:	Police Contacted Result :	

Subject

Full Name:	PERSONAL INFORMATION	Company:	Wu Zhe Dong Fang
Role:	Patron		
Full Name:	LNU, PARQ18-30008b	Company:	
Role:	Patron		
Full Name:	LNU, PARQ18-30008a	Company:	
Role:	Patron		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
PERSONAL INFORMATION	Watch	12/ 5/2018	Permanent
Type Of Ban:	Notes:		
Reason For Ban:			
Identification:			

Supplemental Entries:

SP20180083187 Attached by msdtehrani on May 14, 2018 15:01

Description On 2018-MAY-14 at approximately 1408 hrs cage supervisor meridel DE VERA informed surveillance that SID#235285 PERSONAL INFORMATION bought in for \$5,000 (all in 20s) at CD13, CPV to MEZB309.

Following is result of review and live observation:

At 1402 hrs SID#235285 PERSONAL INFORMATION entering the elevator from unknown floor in Douglas hotel and went to level one and from level one lobby went to casino main entrance and went to 3rd floor.

AT 1405 hrs he arrived to Jade west and asked for \$5,000 CPV buy in mentioned above.

In addition it was noted while SID#235285 PERSONAL INFORMATION was waiting for CPV process, he bought in \$400 in \$20s and start to play at MEZB309 betting average of \$200 on regular bets and up to \$50 on bonuses.

At 1419 hrs he received his chips for CPV mentioned above and increased his regular bets to

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:10 AM

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Appendix 14

Incident File Full Report

Incident File #IN20180030008

SP20180083187 Attached by msdtehrani on May 14, 2018 15:01

SP2018008318

7 - Continued-

\$500 each round and lost his entire bankroll by 1427 hrs.

At 1427 hrs he bought in another \$600 (All in \$20s) and continued to play.

At 1536 hrs SID#235285 [PERSONAL INFORMATION] lost entire bankroll and bought in another \$1,800 (all in \$20s) bringing his buy in for today at \$7,800.

At 1552 hrs SID#235285 [PERSONAL INFORMATION] lost entire bankroll and bought in another \$1,680 (all in \$20s) bringing his buy in for today at \$9,480.

he continued to play until 1604 hrs, lost the bankroll and left the salons.

He went to level one, met two unknown Asian female in front of hotel and all parties left the property with white Tesla.(Plate# DJ566P)

*Note that SID#235285 [PERSONAL INFORMATION] is a Hotel guest in past three days, his total buy in from first visit up to this date and time (MAY-14 at 1552 hrs) is \$23,980, all in \$20s (\$9,500 on MAY-12, \$5000 on MAY 13 and total of \$9,480 on MAY 14 by 1607 hrs).

**During live observation and reviews it was noted that SID#235285 [PERSONAL INFORMATION] has few bricks of \$20s in his bag and all of his buy ins were from same bag,

Related footage is saved under incident number and section 86 is filed.

Massoud TEHRANI.421646.

SP20180083225 Attached by msdtehrani on May 14, 2018 16:56

Description Related footage is transferred to BCLC network drive under Incident number.
Massoud TEHRANI. 42164.

SP20180084676 Attached by sbondesen on May 17, 2018 08:49

Description



Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20180030008](#)

SP20180084676 Attached by sbondesen on May 17, 2018 08:49

SP2018008467

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:10 AM

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Appendix 14

Incident File Full Report

[Incident File #IN20180030008](#)

SP20180084676 Attached by sbondesen on May 17, 2018 08:49

SP2018008467

6 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:10 AM

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Appendix 14

Incident File Full Report

[Incident File #IN20180030008](#)

SP20180084676 Attached by sbondesen on May 17, 2018 08:49

SP2018008467

6 - Continued-



Redacted
- FINTRAC

S.BONDESEN

BCLC – AML Investigations

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:10 AM

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Appendix 14

Incident File Full Report

[Incident File #IN20180030008](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 15

iTrak incident report bearing the Incident File #IN20180030109 (BCLC0015880).

Incident File Full Report

Incident File #IN20180030109

Record Creation Details

Date/Time Occurred: 5/14/2018 11:50 PM
 Day of Week Occurred: Monday
 Date/Time Created: 5/14/2018 11:53 PM
 Date/Time Closed: 5/16/2018 10:08 AM
 Closed By: stolee

Department: Gaming Operations
 Owner: akao
 Operator ID: donbraun
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: Villa Casino (GC)
 Location: Casino Floor-Villa Casino (GC)
 Sublocation: MEZB 09

Details of Incident:

Daily Log #: DL20180455144
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: Refused buy in of \$10,500 for PERSONAL INFORMATION SID#243087
 Checklist: - Section 86 Form

Narrative:	Created On	Created By	Modified On	Modified By
Refused buy in of \$10,500 for PERSONAL INFORMATION SID#243087	5/14/2018 11:53 PM	donbraun		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180030109

Participants Involved:

Personnel

Full Name:	MAK, Wesley "Wes"	Property:	Villa Casino (GC)
Role:	Info From	Department:	Gaming
Police Contacted:	Taken From Scene:	Police Contacted Result:	
Full Name:	MARK, Roland	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION	Company:
Role:	Patron	

Supplemental Entries:

SP20180083392 Attached by wesmak on May 14, 2018 23:57

Description I Wes MAK on duty Shift Manager was informed Patron PERSONAL INFORMATION attempted to buy in a large sum on cash at MEZB9. After staff counted the money, it came to \$10,500. PERSONAL INFORMATION was unable to provide receipt for this buy in. He informed new SOF condition and buy in was denied. PERSONAL INFORMATION was advised of other option of buy in this evening which includes using Quick Cash or GV debit transaction.

END of Report.

SP20180083421 Attached by donbraun on May 15, 2018 00:42

Description May 14, 2018

On the above mentioned date Surveillance was live monitoring a buy in at MEZB 9 totaling \$10,500 when the D/S Panah SADIGH INANLOU contacted Surveillance to advise that he would be returning \$1500 of the cash, which was already counted on the table, so that patron PERSONAL INFORMATION could buy in for under \$10,00 since the money was un sourced. Surveillance advised SADIGH INANLOU to stop and contact S/M Wes MAK for advice who refused the buy in. Surveillance reviewed the applicable footage and the following was observed:

22:41:30 PERSONAL INFORMATION arrives alone in a Grey Nissan SUV BCLP#FW551S and parks on P3 of the south park ade

22:55:15 PERSONAL INFORMATION attempts to buy in at MEZB 9

23:16:18 The cash is returned to PERSONAL INFORMATION

PERSONAL INFORMATION leaves in the same Nissan

Footage saved at Vigil-Avigilon/MAY18/GPEB/UFT/IN30109

End of report

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180030109

SP20180083421 Attached by donbraun on May 15, 2018 00:42

SP2018008342

1 - Continued-

Don BRAUN
66095

SP20180083512 Attached by stolee on May 15, 2018 06:46

Description May/15/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as PERSONAL INFORMATION (SID#243087) was unable to produce a receipt to source a \$10,500 buy-in that put him over \$10,000 for the gaming session as such the transaction was refused.

A review of PERSONAL INFORMATION subject profile was done, it is noted that PERSONAL INFORMATION has no prior UFT incident on file. It is also noted the PERSONAL INFORMATION had received a cash disbursement of \$10,000 from Grand Villa Casino on May/05/2018 which appears to be his last visit to any BC Casinos.

Although PERSONAL INFORMATION was attempting to buy-in with no receipt is does not make the cash (\$10,500) he attempted to use or these circumstances suspicious.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest PERSONAL INFORMATION or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE
BCLC Investigator

SP20180083585 Attached by rmark on May 15, 2018 09:41

Description On 2018-MAY-15, Surveillance released incident reports and subject profiles for IN30109 to GPEB John McDOUGALL as per Demand For Information form

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:03 AM

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Appendix 15

Incident File Full Report[Incident File #IN20180030109](#)

SP20180083585 Attached by rmark on May 15, 2018 09:41

SP2018008358

5 - Continued-

99114 (see Media folder).

END OF REPORT

Roland MARK 26531

SP20180098062 Attached by mshyshkin on Jun 7, 2018 22:54

Description On the above mentioned date surveillance released the reports and subject profiles related to this incident via email to GPEB investigator John MCDOUGALL (see media).

File number: 99288

END REPORT

Max SHYSHKIN

77050

SP20180100968 Attached by aniculescu on Jun 12, 2018 13:12

Description Video footage for this incident has been released to GPEB.

Surveillance Supervisor

Alex NICULESCU

GPEB#50762

END OF REPORT

Reporting Party:

Supervisor:

Appendix 16

iTrak incident report bearing the Incident File #IN20180030356 (BCLC0015881).

Incident File Full Report

[Incident File #IN20180030356](#)

Record Creation Details

Date/Time Occurred: 5/15/2018 8:45 PM
Day of Week Occurred: Tuesday
Date/Time Created: 5/16/2018 10:52 AM
Date/Time Closed:
Closed By:

Department: Gaming Operations
Owner: alaw
Operator ID: malianza
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: Main Cash Cage

Details of Incident:

Daily Log #: DL20180457850

Type: Gaming

Specific: Unusual Financial Transaction

Category:

Redacted - FINTRAC

Incident Status: Closed

Synopsis: SID #183041 BUY-IN \$9.9K (all \$20's) MDB 1 CD 10 cash counter C/S Eva @ RRWS-10 M-02

Cage advised to validate ID on i-Trak file

Checklist: - Section 86 Form

**Redacted -
FINTRAC**

Narrative:

Created On

Created By

Modified On

Modified By

5/16/2018 10:53 AM

malianza

SID #183041 BUY-IN \$9.9K (all \$20's) MDB 1 CD 10 cash counter C/S Eva @ RRWS-10 M-02

Cage advised to validate ID on i-Trak file

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180030356

Participants Involved:

Personnel

Full Name:	BEEKSMA, Steve	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	PERSONAL INFORMATION	Company:	Ronghan Realtor Production
Role:	Patron		Company

Supplemental Entries:

SP20180084148 Attached by malianza on May 16, 2018 10:54

Description Surveillance noticed a cage buy-in for PERSONAL INFORMATION (SID 183041) who has a listed occupation as "Owner Real Estate Company-Ronghan Realtor Production Company."

Although PERSONAL INFORMATION appeared to be gaming with no irregularities noted, the following could be considered unusual with this transaction.

1. PERSONAL INFORMATION was dropped off by an unknown vehicle/driver/license plate. Drop offs are considered a high risk indicator.
2. Although PERSONAL INFORMATION occupation as a real estate owner could provide a source of wealth and access to funds, it is unknown if real estate deals primarily with a large amount of small denominational bills.
3. Large amount of small denominational bills has been an indicator that funds did not originate from a recognized financial institution such as a Bank, ATM, Global Cash & Win or previous Casino Disbursement.
4. PERSONAL INFORMATION has no recent or known gaming activity, thus making it difficult to source these funds to a recent casino disbursement.
5. It appears that PERSONAL INFORMATION bought in just under the FINTRAC-LCT reportable threshold of C\$10,000.
6. It appears that PERSONAL INFORMATION bought in under the FINTRAC-LCT reportable threshold of C\$10K either in order to avoid LCT reporting or providing a receipt under the BCLC SOF Directive program.
7. PERSONAL INFORMATION removes approximately 5x\$20 from his bundle at CD10.
8. PERSONAL INFORMATION has no known recent gaming activity at RRCR or LCT reporting since 2015.

Footage shows the following:

At 20:28 PERSONAL INFORMATION is dropped off by an unknown Lexus SUV (unknown driver and license plate).

At 20:32 PERSONAL INFORMATION presents a bundle of C\$20 at CD10 for cage buy-in. PERSONAL INFORMATION removes approximately 5xC\$20 from his bundle. Cage completes the count for a total of C\$9,900 (495xC\$20).

At 20:53 PERSONAL INFORMATION receives chips at MDB01.

At 20:55 PERSONAL INFORMATION moves to Maple Leaf and Dogwood and begins place wagers as a back-bettor.

Images attached to media.

Footage MAY18\UFT\18-30356

MLIANZA

Reporting Party:

Supervisor:

SP20180084148 Attached by malianza on May 16, 2018 10:54

SP2018008414

8 - Continued-

30068

SP20180084760 Attached by sbeeksma on May 17, 2018 11:51

Description



Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:11 AM

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Appendix 16

BCLC0015881.03

SP20180084760 Attached by sbeeksma on May 17, 2018 11:51

SP2018008476

0 - Continued-

Redacted
- FINTRAC

S.BEEKSMA

BCLC – AML Investigations

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:11 AM

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Appendix 16

BCLC0015881.04

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 17

iTrak incident report bearing the Incident File #IN20180033403 (BCLC0015882).

Incident File Full Report

Incident File #IN20180033403

Record Creation Details

Date/Time Occurred: 5/29/2018 2:14 PM
 Day of Week Occurred: Tuesday
 Date/Time Created: 5/29/2018 2:59 PM
 Date/Time Closed: 5/31/2018 9:38 AM
 Closed By: sbeeksma

Department: Gaming Operations
 Owner: wesmak
 Operator ID: aniculescu
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: Villa Casino (GC)
 Location: Casino Floor-Villa Casino (GC)
 Sublocation: MDB 09

Details of Incident:

Daily Log #: DL20180502197
 Reference: M66
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Closing Remarks: UNSUB
 Synopsis: Asian female **PERSONAL** **RMAT** SID#165553 and Asian man **PER** **INFO** SID#74854 denied buy in at MDB09 due to no receipt.

PER cashed out \$40K at 20:58 CD15.

PER cashed out \$23.2K at 21:00 CD15.

Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
5/29/2018 2:59 PM	aniculescu		
Asian female PERSONAL INFO SID#165553 and Asian man PERSONAL SID#74854 Denied buy in at MDB09 due to no receipt.			

Executive Brief:

Reporting Party:

Supervisor:

Commission of Inquiry into Money Laundering in British Columbia

Incident File Full Report

Incident File #IN20180033403

Participants Involved:

Personnel

Full Name:	BEEKSMA, Steve	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	MARK, Roland	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance
Full Name:	NICULESCU, Alexander Marian	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance
Full Name:	BELL, Lorraine	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Gaming

Subject

Full Name:	PERSONAL INFO	Company:	
Role:	Patron		
Full Name:	PERSONAL INFO	Company:	Daekyoung Construction
Role:	Patron		

Supplemental Entries:

SP20180092455 Attached by aniculescu on May 29, 2018 17:39

Description

On the date of May 29, 2018 at approximately 12:40 hrs Surveillance observed a \$10,000 cash buy in taking place at MDB09 by patron PERSONAL INFO SID#74854. There was one other patron at the table which was Asian female PERSONAL INFO (SID#165553), the buy in was denied due to no receipt, part of the money was pushed back and given to PERSONAL INFO instead of the person who put the money down which was PERSONAL INFO. The following is a breakdown of both their activities while on site, buying in and gambling.

At 12:13:32 hrs PERSONAL INFO is observed arriving on site in a Black Mercedes S550 BCLP: FH5 55L via P1 of the North parking lot. After he parks, he is then observed sitting in his car for approximately 5 minutes.

At 12:15:47 hrs PERSONAL INFO is observed arriving on site in a Beige Jaguar BCLP: DC9 73W via P3 of the South parking lot. After she parks, she gets out and makes her way inside the casino.

At 12:18:15 hrs PERSONAL INFO gets out of his car and makes his way inside the casino. Both PERSONAL INFO and PERSONAL INFO sit down at MDB18.

At 12:28:08 hrs PERSONAL INFO is observed buying in for \$8,600 in \$100 bills at MDB18.

At 12:31:38 hrs PERSONAL INFO receives his chips at MDB18.

At 12:31:58 hrs PERSONAL INFO is now observed buying in for \$1,700 in \$100 bills at MDB18.

At 12:32:44 she receives her chips at MDB18.

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:05 AM

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Appendix 17

BCLC0015882.02

Incident File Full Report

Incident File #IN20180033403

SP20180092455 Attached by aniculescu on May 29, 2018 17:39

SP2018009245

5 - Continued-

At 12:38:45 hrs both [REDACTED] and [REDACTED] stand up from MDB18 and move their play to on of the private salons, MDB09.

At 13:07:28 hrs [REDACTED] is observed putting \$10,000 on the table in \$100 bills. The dealer on the table s proceeds to count the money and ladders it on the table, she takes out \$10,000 in chips of mixed denominations and lays them out waiting for approval to give the chips to the customer.

At 13:15:33 hrs The Dealer Supervisor at MDB09 appears to instruct the Dealer on what to do. The dealer then proceeds to take \$2,000 worth of the buy in and separately counts out \$1,700 and puts \$300 back to the original buy in. She then hands \$1,700 to [PERSONAL INFOR] who appears to be asking for it using her left hand. She then added the remaining \$300 to the original buy in making it a total buy in of \$8,300 instead of \$10,000.

At 13:17:13 hrs The dealer then hands \$8,300 in chips to [REDACTED] instead of [REDACTED] who was the one that put down the \$10,000 in cash. As soon as [REDACTED] receives the chips, she then passes an undetermined amount (\$3,000 or \$4,000) in chips to [REDACTED]

At 13:18:02 hrs [REDACTED] then pulls out another \$1,300 in cash all in \$100 bills at MDB18. He receives his \$1,300 in chips immediately after.

At 14:43:00 hrs [REDACTED] loses her remaining chips and then gets up and leaves site in her car.

At 15:32:36 hrs [REDACTED] returns and buys in at MDB09 for \$8,000 in \$100 bills. She is also observed giving 2 receipts of an undetermined amount to Dealer Supervisor Kathy PHAN.

Shift Manager Lorraine BELL was informed.

As of 20:00:00 hrs Both [REDACTED] and [REDACTED] are still at MDB09 and continuing to play.

Total cash bought in with for both patrons listed below.

[PERSONAL INFOR] (SID#165553)

Total buy in- \$9,700 in \$100 bills

Gaming floor documented buy in - \$18,000

documented buy in - \$9,900

[PERSONAL] (SID#74854)

Total Buy in - \$19,900

Gaming floor

Applicable footage has been saved in VIGIL AND

AVIGILON/EXPORTS/MAY18/GPEB/UNUSUAL FINANCIAL TRANSACTION/IN#33403.

Surveillance Supervisor

Alex NICULESCU

GPEB#50762

END OF REPORT

SP20180092576 Attached by donbraun on May 29, 2018 22:25

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:05 AM

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Appendix 17

Incident File Full Report

Incident File #IN20180033403

SP20180092576 Attached by donbraun on May 29, 2018 22:25

SP2018009257

6 - Continued-

Description Surveillance continued to monitor [PERSONAL INFO] and [PERSONAL INFO] and the following was observed

20:55:20 OH cashes out at CD 15 for \$40,000 all cash and leaves via the same vehicle in which she arrives

20:59:15 [PERSONAL INFO] cashes out at CD 15 for \$23,200 all cash and leaves via the same vehicle in which he arrives

No irregularities were observed

End of report
Don BRAUN
66095

SP20180092901 Attached by rmark on May 30, 2018 12:53

Description On 2018-05-30, I released incident and subject information from IN33403 to GPEB John McDOUGALL as per Demand For Information request. THE DIF was scanned into the incident Media folder.

END OF REPORT
Roland MARK 26531

SP20180093314 Attached by sbEEKSMA on May 31, 2018 09:38

Description Incident noted, details reviewed.
RE: Refused SOF Request.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as [PERSONAL INFO] (SID 165553) was unable to produce a receipt to source a cash buy in that put her over \$10,000.

Review of [PERSONAL INFO] recent LCT records confirms that on 2018-MAY-24 @ 1957hrs she received a \$38,100 cash disbursement at a competitor's casino which confirms she had access to funds to gamble with. LCT 2018-26682 refers.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSONAL INFO] or the funds she attempted to use/used this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

S.BEEKSMA
BCLC - AML Investigations

Reporting Party:

Supervisor:

Incident File Full Report[Incident File #IN20180033403](#)

SP20180100969 Attached by aniculescu on Jun 12, 2018 13:22

Description Video footage for this incident has been released to GPEB.

Surveillance Supervisor

Alex NICULESCU

GPEB#50762

END OF REPORT

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:05 AM

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Appendix 17

Appendix 18

iTrak incident report bearing the Incident File #IN20180033893 (BCLC0015883).

Incident File Full Report

Incident File #IN20180033893

Record Creation Details

Date/Time Occurred: 5/31/2018 4:23 PM
 Day of Week Occurred: Thursday
 Date/Time Created: 5/31/2018 4:24 PM
 Date/Time Closed: 6/ 1/2018 11:50 AM
 Closed By: stolee

Department: Gaming Operations
 Owner: lbell
 Operator ID: jostonal
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: Villa Casino (GC)
 Location: Casino Floor-Villa Casino (GC)
 Sublocation: MDB 06

Details of Incident:

Daily Log #: DL20180509060
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: **PERSONAL INFO** (SID 165553) was denied \$10,000 buy in and bought in for \$9500 after
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
5/31/2018 4:24 PM	jostonal		
PERSONAL INFO (SID 165553) was denied \$10,000 buy in and bought in for \$9500 after			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180033893

Participants Involved:

Personnel

Full Name:	LEW, Gordon "Gordo"	Property:	Villa Casino (GC)
Role:	Info From	Department:	Cage
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	MARK, Roland	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance
Full Name:	OSTONAL, Jonathan	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORM	Company:
Role:	Patron	

Supplemental Entries:

SP20180093471 Attached by jostonal on May 31, 2018 17:20

Description On the above mentioned date at approximately 15:50 hrs Surveillance was informed that patron PERSONAL INFORM (SID 165553) attempted to buy in for \$10000 and was denied; she then subsequently bought in for \$9500. A review was initiated and the following was observed:

12:33:01 - PERS arrives on site and parks.

15:36:09 - PERS tries to buy in for \$10000; the bills are counted out and the chips are prepared before the transaction is cancelled and the bills are handed back.

15:42:18: PERS is observed counting out \$500 and removing it from the stack before handing the cash back for a \$9500 buy in that is accepted and processed - she then receives her chips and begins play.

As of 19:45 PERS is still gaming on MDB21.

Footage has been saved on Exports/2018/05. May 18/GPEB/Unusual financial transaction/IN33893 and video archive/2018/05. MAY 18/GPEB/Unusual financial transaction/IN33893.

Jonathan OSTONAL
Surveillance Officer
76984

END OF REPORT.

SP20180093745 Attached by stolee on Jun 1, 2018 06:28

Description Jun/01/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:06 AM

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Appendix 18

Incident File Full Report

Incident File #IN20180033893

SP20180093745 Attached by stlee on Jun 1, 2018 06:28

SP2018009374

5 - Continued-

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as [PERSONAL INFO] (SID#165553) was unable to produce a receipt to source a \$10,000 buy-in that put her over \$10,000 for the gaming session as such the transaction was refused. It is noted that [PERS] decided to take back \$500 and bought in for \$9,500.

Although [PERS] was attempting to buy-in with no receipt is does not make the cash (\$10,000) she attempted to use or these circumstances suspicious. It is noted that [PERS] did receive a total cash disbursement of \$40,000 from Parq Casino on May/29/2018 which appears to be with-in 48 hrs from her last visit to any BC Casinos.

A review of [PERSON] subject profile was done, [PERS] has been generating LCTR in BC casinos since Dec/2009 with buy-ins ranging from \$2,000- \$44,000 per gaming session.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERS] or the funds she attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE
BCLC Investigator

SP20180096372 Attached by rmark on Jun 5, 2018 09:02

Description On 2018-JUN-05, Surveillance released incident reports and subject profiles for IN33893 to GPB John McDOUGALL as per Demand For Information form (see Media folder).

END OF REPORT
Roland MARK 26531

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:06 AM

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Appendix 18

Incident File Full Report

[Incident File #IN20180033893](#)

Reporting Party:

Supervisor:

Appendix 19

iTrak incident report bearing the Incident File #IN20180034488 (BCLC0015884).

Incident File Full Report

Incident File #IN20180034488

Record Creation Details

Date/Time Occurred: 6/3/2018 1:33 AM
 Day of Week Occurred: Sunday
 Date/Time Created: 6/3/2018 1:34 AM
 Date/Time Closed: 6/5/2018 10:13 AM
 Closed By: lcousins

Department: Gaming Operations
 Owner: alaw
 Operator ID: vsuvajac
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: KBBJ 35

Details of Incident:

Daily Log #: DL20180517457
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: Missing SOF
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
6/3/2018 1:38 AM	vsuvajac		
SOF refusal SID#121108			

Executive Brief:

Participants Involved:

Personnel

Full Name: COUSINS, Lynn Property: Vancouver (BCLC)
 Role: Documenter Department: Security

Subject

Full Name: PERSONAL INFORMATION Company:
 Role: Patron

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180034488

Supplemental Entries:

SP20180095021 Attached by dtrajkovic on Jun 3, 2018 02:05

Description At approx. 01:19 GA/M TING informed Surveillance that SID # 121108 PERSONAL INFORMATION presented \$1,600 in \$100 bills at KBBJ 35. With this buy in PERSONAL INFORMATION would cross \$10,000 threshold for SOF so PERSONAL INFORMATION pulled back 6x\$100 bills and bought for \$1,000. Video saved as 18-34488 in M:.../jun/sof refusal folder. Form 86 sent

Djordje TRAJKOVIC
23474

SP20180095107 Attached by eting on Jun 3, 2018 04:14

Description At approximately 01:10 of gaming date June 2nd, 2018, RGM TING, Eric (GPEB#64123) was advised that patron PERSONAL INFORMATION (SID#121108) introduced \$1,600 (all in 100's) for buy-in on KBBJ35. PERSONAL INFORMATION previously bought-in \$8,900 and the buy-in PERSONAL INFORMATION introduced will accumulate the total buy-in to \$10,500 and SOF needed to be conducted. TING approached PERSONAL INFORMATION and was told by PERSONAL INFORMATION that she didn't have any receipt to prove the source of the funds. It was also confirmed by the Cage that PERSONAL INFORMATION didn't have any disbursements within 48 hours. TING explained to PERSONAL INFORMATION regarding the BCLC SOF Directive and advised PERSONAL INFORMATION that the buy-in will not be accepted. There was no direction provided to PERSONAL INFORMATION PERSONAL INFORMATION decided to reduce the buy-in to comply with BCLC policy. \$1,000 cash buy-in was accepted which accumulated PERSONAL INFORMATION total buy-in on the mentioned gaming date to \$9,900. PERSONAL INFORMATION continued gaming without further incident. All departments were informed.

TING, Eric
Relief Gaming Manager
GPEB#64123

SP20180096424 Attached by lcousins on Jun 5, 2018 10:08

Description This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case 2018-MAY-30 PERSONAL INFORMATION [f](SID#121108) had bought in for \$8,900 when she attempted another buy-in of \$1,600 (\$100 bills) which would have put her over SOF Directive threshold for receipts. Per the SOF Directive PERSONAL INFORMATION was approached, advised of the SOF requirements and asked for bank receipts. PERSONAL INFORMATION chose to change her buy-in to \$1K which left her below the threshold for receipts. PERSONAL INFORMATION continued to game without irregularity

PERSONAL INFORMATION is last noted to have been in a BC Casino 2018-MAY-28 when she cashed out for \$22,900 providing for SOF for this incident. This is the first documented incident under the new SOF Directive. It does not appear she was attempting anything untoward, she was trying to cross the \$10K threshold in an overt manner. PERSONAL INFORMATION is now aware of the directive and the requirement for receipts.

The money produced for this buy in was loose \$100 bills from a wallet she had on her person.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180034488

SP20180096424 Attached by lcousins on Jun 5, 2018 10:08

SP2018009642

4 - Continued-

PERSONAL INFO is documented to have been gambling in BC Casinos since 2012-JUN and has generated 54 LCT records to date. Typical buy in amounts have been in the \$10-\$11K range which is in line with this buy in.

No irregularities were noted in PERSONAL INFO play, she was buying in as needed to further her gaming.

PERSONAL INFO was noted to be putting reasonable amounts at risk.

PERSONAL INFO arrived on site alone, the money (\$100 bills) came from within her purse (i.e. she came on site with it).

PERSONAL INFO will be monitored moving forward with matters escalated as deemed appropriate.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators. Therefore unless further information comes to light that may suggest PERSONAL INFO or the money she attempted to use this date is linked to criminal activity, the investigator will not be submitting an STR to FINTRAC.

The category has been amended to UFT / Unsubstantiated.

L. Cousins, Investigator

BCLC-AML

Reporting Party:

Supervisor:

Appendix 20

iTrak incident report bearing the Incident File #IN20180046314 (BCLC0015886).

Incident File Full Report

[Incident File #IN20180046314](#)

Record Creation Details

Date/Time Occurred: 7/28/2018 5:26 AM
Day of Week Occurred: Saturday
Date/Time Created: 7/28/2018 5:27 AM
Date/Time Closed:
Closed By:

Department: Surveillance
Owner: adekraker
Operator ID: adekraker
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Starlight Casino (GC)
Location: Casino Floor-Starlight Casino
Sublocation: KBBJ 03

Details of Incident:

Daily Log #: DL20180690042
Type: Gaming
Specific: Unusual Financial Transaction
Category: **Redacted - FINTRAC**
Incident Status: Closed
Synopsis: **PERSONAL INFORMATION** (52986) bought in for \$9450 primarily in 20's
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
7/28/2018 5:28 AM	adekraker	7/28/2018 10:10 PM	adekraker
PERSONAL INFORMATION (52986) bought in for \$9585 primarily in 20's			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180046314

Participants Involved:

Personnel

Full Name:	COUSINS, Lynn	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	Security
Full Name:	DEKRAKER, Andrew	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Surveillance
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	NICHOLSON, Lesley	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	

Subject

Full Name:	PERSONAL INFORMATION	Company:
Role:	Patron	

Supplemental Entries:

SP20180127266 Attached by adekraker on Jul 28, 2018 21:00

Description July 28, 2018

Surveillance reviewed relevant footage and observed the following

At 01:31 hours on the above date, patron PERSONAL INFORMATION (52986) arrives on site in the older model Dodge Caravan (EW873A) associated with his profile. PERSONAL INFORMATION parks in the upper parking lot and enters the casino through the main entrance. He proceeds to EZB 5 in pit 9, and buys in for \$135 (13 x \$10 and 1 x \$5). He plays one hand at that table, winning his banker bet and losing his bonus bets. He then proceeds to KBBJ 3 in VIP.

At 01:49 PERSONAL INFORMATION buys in for \$2800 entirely in twenty dollar bills at KBBJ3 and begins play.

At 02:55 PERSONAL INFORMATION removes a wad of bills from his jacket pocket and places them on the table at MEZB 7. The bills are in the following denominations. 5 x \$100

1

19 x \$50

10 x \$20

The total buy in is \$1650.

At 05:10 hours, PERSONAL INFORMATION is seated at MDB 2, and loses the last of his chips. He reaches into his pocket and removes a bundle of 20 dollar bills wrapped in elastic bands. He removes the bands and places the bundle on the table. The bundle contains 250 x \$20 bills. He receives his 6 x \$500 chips and 20 x \$100 chips and commences play.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180046314

SP20180127266 Attached by adekraker on Jul 28, 2018 21:00

SP2018012726

6 - Continued-

PERSONAL INFORMATION total buy in for the day is \$9585(5 x\$100, 19 x \$50 and 400 x \$20, 13 x \$10 and 1 x \$5)

During his play from 02:55 on, PERSONAL INFORMATION is in constant motion between MDB1, MDB 2 and MEZB 7, placing bets on all three tables.

At 0718 hours, PERSONAL INFORMATION commits a cheat at play at MEZB 7 (IN18-46324 refers). He is approached by security at 07:26 hours, and escorted off the gaming floor. He then returns to his vehicle and drives off site.

Form 86 sent.

Footage saved in exports\Unusual financial transactions\July 2018\18-46314 07-28-18

PERSONAL INFORMATION

Andrew DEKRAKER
Relief Surveillance Supervisor
GPEB 70646

SP20180129324 Attached by lcousins on Aug 1, 2018 09:55

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:15 AM

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Appendix 20

Incident File Full Report

[Incident File #IN20180046314](#)

SP20180129324 Attached by lcousins on Aug 1, 2018 09:55

SP2018012932

4 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:15 AM

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Appendix 20

Incident File Full Report

[Incident File #IN20180046314](#)

SP20180129324 Attached by lcousins on Aug 1, 2018 09:55

SP2018012932

4 - Continued-



Redacted
- FINTRAC

L. Cousins

Investigator BCLC – AML

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:15 AM

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Appendix 20

Incident File Full Report

[Incident File #IN20180046314](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 21

iTrak incident report bearing the Incident File #IN20190044132 (BCLC0015890).

Incident File Full Report

[Incident File #IN20190044132](#)

Date/Time Occurred: 5:20 PM
Day of Week Occurred: Redacted - RCMP
Date/Time Created: 3:54 AM
Date/Time Closed: 12:03 PM
Closed By: jklam

Record Creation Details

Department: Surveillance
Owner: aorlov
Operator ID: aorlov
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Parq Casino
Location: Casino level 3
Sublocation: MDB 813

Details of Incident:

Daily Log #: DL20190600164
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Closing Remarks: Refer to IN20190044265
Synopsis: Small denomination buy-in conducted between 3 patrons on MDB813
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 3:54 AM	aorlov		

Small denomination buy-in conducted between 3 patrons on MDB813.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20190044132

Participants Involved:

Personnel

Full Name: ORLOV, Alex (Alexei) Property: Parq Casino

Role: Documenter Department: Surveillance

Full Name: LAM, Jenny Property: Parq Casino

Role: Documenter Department: BCLC

Subject

Full Name: LNU, PARQ19-44132 Company:

Role: Patron

Full Name: LNU, PARQ19-44119 Company:

Role: Patron

Full Name: Redacted - RCMP Company: Redacted - RCMP

Role: Patron

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
LNU, PARQ19-44132	Ban	Redacted - RCMP	Permanent

Type Of Ban: BCLC Prohibition

Notes:

Reason For Ban:

Identification: None

LNU, PARQ19-44119	Ban	Redacted - RCMP	Permanent
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Type Of Ban: BCLC Prohibition

Notes:

Reason For Ban:

Identification: None

Supplemental Entries:

SP20190117655 Attached by aorlov on Redacted - RCMP 03:57

Description On 2019-JUL-07, Surveillance conducted a review of abandoned chips for patrons of MDB813. After review was observed that SID Redacted - RCMP LNU (Name on encore card Redacted - RCMP), Redacted - RCMP and SID Redacted - RCMP LNU all conducted small denomination buy ins on MDB813.

A review of the players actions are as follows Redacted - RCMP

17:21:20hrs- All 3 patrons arrived on site in a Redacted - RCMP are proceed through the main entrance.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20190044132

SP20190117655 Attached by aorlov on [Redacted - RCMP] 03:57

SP2019011765

5 - Continued-

17:29:46hrs- After entering site, the three patrons are all seen making their way up to Jade East and proceed to buy on MDB813. [Redacted - RCMP] is seen taking out a large stack of mixed denomination bills from his right pants pocket which is bound together by elastics. After the money is counted, chips were given to the patron for the amount of \$8900 in \$20s, \$50s, and \$100s

17:41:18hrs- SID# [Redacted - RCMP] conducts the next buy in. Review shows that [Redacted - RCMP] receives his buy in from SI [Redacted - RCMP]'s bag. [Redacted - RCMP] total buy in is \$9900 in a mixture of \$50s and \$20s. SID# [Redacted - RCMP] does not conduct a buy.

A reviews of the patrons play was reviewed and showed avg bets of \$500-\$1000 per hand with no bets on bonus.

18:22:48hrs- All 3 patrons are seen leaving MDB813 and head down towards the parkade. SID# [Redacted - RCMP] both abandon their chips on MDB813. SID# [Redacted - RCMP] goes down to retrieve the [Redacted - RCMP], while the other two patrons wait near the valet area. All patrons enter the vehicle and leave site via Pacific BLVD.

Relevant footage saved under "UFT"

Section 86 sent

Alex ORLOV

83205

SP20190117721 Attached by aorlov on [Redacted - RCMP] 05:54

Description Footage transfered to BCLC Share Drive

SP20190121167 Attached by jklam on [Redacted - RCMP] 11:59

Description Combined with [Redacted - FINTRAC] For full details of the investigation please refer to IN200190044265

SP20190122823 Attached by sbekksma on [Redacted - RCMP] 06:53

Description On [Redacted - RCMP] copies of this report were password protected, watermarked and transferred to the SFTP for GPEB, JIGIT and CISBC-YT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20190044132](#)

Reporting Party:

Supervisor:

Appendix 22

iTrak incident report bearing the Incident File #IN20190044265 (BCLC0015891).

Incident File Full Report

[Incident File #IN20190044265](#)

Date/Time Occurred: 6:49 PM
Day of Week Occurred: Redacted - RCMP
Date/Time Created: 6:52 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Surveillance
Owner: aabrown
Operator ID: aabrown
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Parq Casino
Location: Casino level 3
Sublocation: MDB 813

Details of Incident:

Daily Log #: DL20190602000
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Synopsis: SID Redacted - RCMP bought in \$9780 in small denominations. Possible cash pass from SID Redacted - RCMP PARQ19-44132 LNU.
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
7/ 7/2019 6:52 PM	aabrown		
SID Redacted - RCMP bought in \$9780 in small denominations. Possible cash pass from SID Redacted - RCMP PARQ19-44132 LNU.			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20190044265

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Parq Casino
Role:	Documenter	Department:	BCLC
Full Name:	BROWN, Aaron	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	SEIF DOKHT TEHRANI, Massoud	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

Full Name:	LNU, PARQ19-44132	Company:	
Role:	Patron		
Full Name:	LNU, PARQ19-44265	Company:	
Role:	Patron		
Full Name:	LNU, PARQ19-44265c	Company:	
Role:	Patron		
Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Redacted - RCMP		
Full Name:	Redacted - RCMP	Company:	
Role:	Redacted - RCMP		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
Redacted - RCMP	Watch	Redacted - RCMP	Permanent
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			
Redacted - RCMP	Ban	Redacted - RCMP	Permanent
Type Of Ban:	BCLC Prohibition	Notes:	
Reason For Ban:			
Identification:	Passport		
LNU, PARQ19-44265c	Ban	Redacted - RCMP	Permanent
Type Of Ban:	BCLC Prohibition	Notes:	
Reason For Ban:			

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20190044265](#)

Identification: None

Supplemental Entries:

SP20190118034 Attached by aabrown o [Redacted - RCMP] 18:55

Description On [Redacted - RCMP] at approximately 17:50 hrs the writer observed SID [Redacted - RCMP] buying in \$9780 in small denominations at MDB813 with 3 unknown asian males one being SID [Redacted] PARQ19-44132 LNU and a subject now known as SID [Redacted] PARQ19-44265 LNU. One of the subjects will not have a subject file created for this report as he did not play or buy in. A full review was conducted and the following was found:

16:12:23- [Redacted] and associates arrive on site via Expo in a [Redacted - RCMP] unknown. The vehicle is parked in P2 of the parkade and the associates make their way to the 3rd level gaming floor via Douglas elevators #10.

16:15:51- All 4 patrons arrive in Jade East and go directly to MDB813.

16:17:31- SID [Redacted] PARQ19-44265 buys in \$5000 in \$50's at MDB813 and receives (10x\$500) in chips

16:46:15- SID [Redacted] PARQ19-44265 loses the entire \$5000. All 4 subjects leave MDB813 and make their way to the smoking patio.

16:50:42- On the smoking patio SID [Redacted] PARQ19-44132 LNU pulls a large stack of rubber banded \$20's and possibly \$50's out of his pocket and looks as if he is going to give it to SID [Redacted] PARQ19-44265. SID [Redacted] PARQ19-44265 does not take the money and the subjects being smoking.

17:17:49- All 4 subjects leave the smoking patio and go back into the casino level 3 [Redacted] and SID [Redacted] PARQ19-44132 LNU go to the washroom together near the 3rd level baccarat pits. The subjects are in the washroom briefly and then meet up with their associates to go back to Jade East.

17:22:26- All subjects arrive in Jade East.

17:41:41 [Redacted] buys in \$9780 in small denominations (100x\$50, 239x\$20) and receives (5x\$1000, 8x\$500, 7x\$100, 3x\$25, 1x\$5) in chips.

It seems possible that SID [Redacted] PARQ19-44132 LNU passed [Redacted] a stack of small denominations in the washroom just before they went into Jade East. SID [Redacted] PARQ19-44132 LNU never plays this entire session but was seen with rubber banded small denomination bills.

19:34:45- All subjects get up from table MDB813 and go to the cash cage where [Redacted] cashes out \$9450 (9x\$1000, 4x\$100, 2x\$50) in chips at CD12 and receives (94x\$100, 1x\$50) in cash.

On completion of the cash out all subjects go back down to P2 via Douglas elevator #10 and leave in the same vehicle all 4 subjects arrived in.

End of Report.

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20190044265](#)SP20190118034 Attached by aabrown on Redacted - RCMP 18:55

SP2019011803

4 - Continued-

Footage saved in the UFT folder

A section 86 was sent

Aaron BROWN

81982

SP20190118050 Attached by aabrown on Redacted - RCMP 19:57

Description On Redacted - RCMP the writer transferred the relevant footage of this incident to the BCLC shared drive.

Aaron BROWN

81982

SP20190121157 Attached by jklam on Redacted - RCMP 11:43

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:19 AM

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Appendix 22

Incident File Full Report

[Incident File #IN20190044265](#)

SP20190121157 Attached by jklam on Redacted - 11:43

SP2019012115

7 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:19 AM

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Appendix 22

Incident File Full Report

[Incident File #IN20190044265](#)SP20190121157 Attached by jklam on Redacted - RCMP 11:43

SP2019012115

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:19 AM

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Appendix 22

Incident File Full Report

[Incident File #IN20190044265](#)SP20190121157 Attached by jklam on Redacted - RCMP 11:43

SP2019012115

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:19 AM

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Appendix 22

Incident File Full Report

[Incident File #IN20190044265](#)

SP20190121157 Attached by jklam on [Redacted -] 11:43

SP2019012115

7 - Continued-



Redacted
- FINTRAC

Jenny LAM

BCLC – AML Investigations

SP20190122822 Attached by sbEEKSMA on [Redacted - RCMP] 06:53

Description

On [Redacted -] copies of this report were password protected, watermarked and transferred to the SFTP for GPEB, JIGIT and CISBC-YT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:19 AM

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Appendix 22

Incident File Full Report

[Incident File #IN20190044265](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 23

iTrak incident report bearing the Incident File #IN20200002279 (BCLC0016414).

Incident File Full Report

[Incident File #IN20200002279](#)

Date/Time Occurred: 8:48 PM

Day of Week Occurred: Redacted - RCMP

Date/Time Created: 9:13 PM

Date/Time Closed:

Closed By:

Record Creation Details

Department: Gaming Operations

Owner: alaw

Operator ID: phhua

Operator Name:

Personnel ID:

Card Number:

Job Position

Secondary Operator:

Location of Incident:

Property: River Rock (GCC)

Location: Back of House-River Rock (GCC)

Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20200030664

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Synopsis: No SID Redacted - RCMP BI \$9.9k (all 20's) at CD19 to MDB24 as per CS May -approved by TGM Leon

Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On

Created By

Modified On

Modified By

Redacted - RCMP 10:17 PM

phhua

Redacted - RCMP 10:47 PM

phhua

SID Redacted - RCMP LNU BI \$9.9k (all 20's) at CD19 to MDB24

Created On

Created By

Modified On

Modified By

Redacted - RCMP 12:47 PM

jhusler

Combined with IN20200002280

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200002279

Participants Involved:

Personnel

Full Name:	HUSLER, Jim	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	ZHOU, Leon Cong Xuan	Property:	River Rock (GCC)
Role:	Reporter	Department:	Tables

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Supplemental Entries:

SP20200005551 Attached by phhua on Redacted - RCMP 22:21

Description Redacted - RCMP at approximately 20:34hrs, Surveillance received a call from Salon Cage regarding a \$9900 (495 x \$20CDN bills) for Redacted - RCMP. Currency appears to come from his jacket and placed on CD19. Currency is counted at Salon Cage after Associate's buy in (see related INC 02280). Gaming Manager ZHOU attended to POI at Salon Cage.

Review shows:

Redacted - RCMP

20:24hrs Redacted - RCMP appears to arrive on site from West Parking Lot P3 (Stair 2) with an

Associate Redacted - RCMP

Vehicle unknown.

20:27hrs Redacted - RCMP walks from West Lobby entrance and proceed to Salon Room.

20:55hrs Redacted - RCMP receives gaming chips at MDB 24 from previous noted buy in.

ID was requested by Gaming Manager ZHOU. Redacted - RCMP could not/declined to provide valid government issued ID.

Redacted - RCMP provided a BC Gold Encore Card (see media)

Incident opened due to high count of small denomination bills/possibly avoiding Fintrac reportable threshold/no ID. POI observed having minimal play in Dogwood Room.

Redacted - RCMP

00:12hrs Redacted - RCMP observed coloring up 10 x \$1000 chips for 2 x \$5000 chips at MDB 25.

Footage M Redacted - RCMP /UFT/20-02279

Phil Hua

34759

Surveillance Shift Manager

SP20200005577 Attached by leonzhou on Redacted - RCMP 00:06

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

BCLC0016414.02

Incident File Full Report

Incident File #IN20200002279

SP20200005577 Attached by leonzhou on [Redacted - RCMP] 00:06

SP2020000557

7 - Continued-

Description Approx 20:40, writer was informed of a patron, identified as [Redacted - RCMP] who did tried to B/I \$9,900 cash in \$20 bills. Writer approached patron and asked for the source of the funds, patron states it was from a bank withdraw, they didn't keep the receipt as they are not familiar with our policies. Writer explained to the patron about our sourced funds policies and informed [Redacted - RCMP] that he if he cashes out, he will be returned the B/I amount in \$20 bills. B/I 9.9K on MDB 23 (9 x \$1000 chips 1 x \$500 chip x 5 x \$100 chips).

At approx 00:10 AM, patron returned to Salon and wanted to colour change 10 x \$1000 chips(Yellows) to 2 x \$5000 chips(Browns) on MDB 25. After the patron changed chips they left salon with no further incidents.

TGM ZHOU, Leon
72827

SP20200007618 Attached by bcastil on [Redacted - RCMP] 23:57

Description At 23:35hrs. on [Redacted - RCMP] presented 9.9K in Chips on CD11 for a cash-out. Cage Supervisor Angel TSANG was informed to obtain all information for LCT purposes; As per CS TSANG, a Passport was obtained. Subject Profile will be updated.

[Redacted - RCMP] was paid out 9.9K in \$20s.

Footage added to: M [Redacted - RCMP] JFT/

Bench CASTIL
Surveillance Shift Manager
#61729

SP20200008207 Attached by jhusler on [Redacted - RCMP] 12:43

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

Incident File Full Report

[Incident File #IN20200002279](#)SP20200008207 Attached by jhusler on

Redacted -
RCMP

 2:43

SP2020000820

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

Incident File Full Report

[Incident File #IN20200002279](#)SP20200008207 Attached by jhusler on

Redacted -
RCMP

 12:43

SP2020000820

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

Incident File Full Report

[Incident File #IN20200002279](#)SP20200008207 Attached by jhusler on

Redacted -
RCMP

 2:43

SP2020000820

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

Incident File Full Report

[Incident File #IN20200002279](#)SP20200008207 Attached by jhusler on Redacted - RCMP 12:43

SP2020000820

7 - Continued-



B.C. Lottery Corporation file number IN20200002280 refers.

JHUSLER

BCLC – AML Investigations

SP20200010209 Attached by sbeeksma on Redacted - RCMP 07:55

Description

On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT and CISBC-YT. The CISBC-YT copy has been password protected and watermarked.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:31 PM

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Appendix 23

Incident File Full Report

[Incident File #IN20200002279](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 24

iTrak incident report bearing the Incident File #IN20200002280 (BCLC0016415).

Incident File Full Report

[Incident File #IN20200002280](#)

Date/Time Occurred: 8:35 PM
 Day of Week Occurred: Redacted - RCMP
 Date/Time Created: 9:17 PM
 Date/Time Closed:
 Closed By:

Record Creation Details

Department: Gaming Operations
 Owner: alaw
 Operator ID: phhua
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Back of House-River Rock (GCC)
 Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20200030632
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Redacted - FINTRAC
 Incident Status: Closed
 Synopsis: UFT: Redacted - RCMP BI \$9.9k (all 20's) at CD19 to MDB24 as per CS May
 Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 9:17 PM	phhua		
Redacted - RCMP	BI \$9.9k (all 20's) at CD19 to MDB24		
Created On	Created By	Modified On	Modified By
Redacted - RCMP 2:42 PM	jhusler		
Combined with IN20200002279			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200002280

Participants Involved:

Personnel

Full Name: HUSLER, Jim Property: Vancouver (BCLC)
Role: Documenter Department: BCLC

Subject

Full Name: Redacted - RCMP Company: Redacted - RCMP
Role: Patron

Supplemental Entries:

SP20200005546 Attached by phhua on Redacted - RCMP 22:03

Description Redacted - RCMP at approximately 20:32hrs, Surveillance received a call from Salon Cage regarding a \$9900 (495 x \$20CDN bills) for Redacted - RCMP. Currency appears to come from his jacket and placed on CD19. Currency is counted at Salon Cage.

Review shows:

Redacted - RCMP

20:27hrs - Redacted - RCMP appears to arrive on site from West Parking Lot P3 (Stair 2) with an Unknown Associate Redacted - RCMP vehicle unknown.

20:30hrs - Redacted - RCMP walks from West Lobby entrance and proceed to Salon Room.

20:44hrs - Redacted - RCMP receives gaming chips at MDB 24 from previous noted buy in. Redacted - RCMP observed gaming in Dogwood Room after receiving gaming chips.

Incident opened due to high count of small denomination bills/possibly avoiding Fintrac reportable threshold.

Redacted - RCMP

00:12hrs - Redacted - RCMP observed coloring up 10 x \$1000 chips for 2 x \$5000 chips at MDB 22.

Footage M: Redacted - RCMP UFT/20-02280

Phil Hua

34759

Surveillance Shift Manager

SP20200008206 Attached by jhusler on Redacted - RCMP 12:35

Description

Redacted -
FINTRAC

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200002280](#)SP20200008206 Attached by jhusler on Redacted -
RCMP 12:35

SP2020000820

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:30 PM

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Appendix 24

Incident File Full Report

[Incident File #IN20200002280](#)SP20200008206 Attached by jhusler on

Redacted -
RCMP

 12:35

SP2020000820

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:30 PM

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Appendix 24

Incident File Full Report

[Incident File #IN20200002280](#)

SP20200008206 Attached by jhusler of Redacted - RCMP 2:35

SP2020000820

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:30 PM

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Appendix 24

Incident File Full Report

[Incident File #IN20200002280](#)SP20200008206 Attached by jhusler on Redacted - RCMP 12:35

SP2020000820

6 - Continued-



B.C. Lottery Corporation file number IN20200002280 refers.

JHUSLER

BCLC – AML Investigations

SP20200010208 Attached by sbeeksma on Redacted - RCMP 07:54

Description

On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT and CISBC-YT. The CISBC-YT copy has been password protected and watermarked.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:30 PM

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Appendix 24

Incident File Full Report

[Incident File #IN20200002280](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 25

iTrak incident report bearing the Incident File #IN20200002422 (BCLC0016416).

Incident File Full Report

[Incident File #IN20200002422](#)

Date/Time Occurred: [Redacted - RCMP] 12:33 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted - RCMP] 4:10 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Surveillance
Owner: fumisato
Operator ID: fumisato
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20200032692
Type: Gaming
Specific: Unusual Financial Transaction
Category: **Redacted - FINTRAC**
Incident Status: Closed
Synopsis: UFT: [Redacted - RCMP] \$5K cash b/i (\$20s) to MDB 25, \$8K total cash b/i (\$20s) | CD17 | C/S Lilian

Review showed total buy ins \$10,020 (all in \$20 bills)

Checklist:

Missed R/M
- Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
------------	------------	-------------	-------------

[Redacted - RCMP] 4:10 PM	fumisato		
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[Redacted - RCMP] conducted \$5K cash B/I (250x\$20s) at CD17 to MDB 25, \$8K total cash B/I (\$20s)

Created On	Created By	Modified On	Modified By
------------	------------	-------------	-------------

[Redacted - RCMP] 4:47 PM	fumisato		
---------------------------	----------	--	--

Further review showed [Redacted - RCMP] conducted a total buy in of \$10,020 (501x\$20 bills)

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200002422

Participants Involved:

Personnel

Full Name: HUSLER, Jim Property: Vancouver (BCLC)
Role: Documenter Department: BCLC

Subject

Full Name: Redacted - RCMP Company: Redacted - RCMP
Role: Patron

Supplemental Entries:

SP20200005864 Attached by fumisato on Redacted - RCMP 16:12

Description Redacted - RCMP at approximately 1233hrs Redacted - RCMP conducted cash buy in for the amount of \$5,000 (250x\$20 bills) wrapped in elastic bands at CD17 for table MDB25, total cash buy ins \$10,020 (all in \$20 bills).

Incident opened due to large amount of small bills used that were wrapped in elastic bands.

Review showed the following:

0238hrs Redacted - RCMP arrives alone in West parking lot level 2 driving a Redacted - RCMP
Redacted - RCMP enters casino via West lobby entrance alone

0245hrs Redacted - RCMP presents a cash buy in for \$2,020 (101x\$20 bills) on table BACX01

0954hrs Redacted - RCMP presents a cash buy in for \$3,000 (150x\$20 unsorted bills) wrapped in elastic bands on gaming table MDB31

1230hrs Redacted - RCMP presents a cash buy in for \$5,000 (250x\$20 bills) wrapped in elastic bands at CD17

Redacted - RCMP receives his chips and makes substantial bets.

Footage saved to M: Redacted - RCMP \UFT\

Fumi SATO - 23495

SP20200007271 Attached by jhusler on Redacted - RCMP 09:43

Description

Redacted -
FINTRAC

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200002422](#)SP20200007271 Attached by jhusler on Redacted -
RCMP 09:43

SP2020000727

1 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:32 PM

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Appendix 25

Incident File Full Report

[Incident File #IN20200002422](#)SP20200007271 Attached by jhusler on Redacted -
RCMP 09:43

SP2020000727

1 - Continued-



Redacted
- FINTRAC

B.C. Lottery Corporation file number 20200002422 refers.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:32 PM

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Appendix 25

Incident File Full Report

[Incident File #IN20200002422](#)

SP20200007271 Attached by jhusler on [Redacted - RCMP] 09:43

SP2020000727

1 - Continued-

JHUSLER

BCLC – AML Investigations

SP20200007287 Attached by sbeeksma on [Redacted - RCMP] 10:18

Description

On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT and CISBC-YT. The CISBC-YT copy has been password protected and watermarked.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:32 PM

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Appendix 25

Incident File Full Report

[Incident File #IN20200002422](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 26

iTrak incident report bearing the Incident File #IN20200004616 (BCLC0016417).

Incident File Full Report

[Incident File #IN20200004616](#)

Date/Time Occurred: 6:12 PM
 Day of Week Occurred: Redacted - RCMP
 Date/Time Created: 7:02 PM
 Date/Time Closed: 10:23 AM
 Closed By: stolee

Record Creation Details

Department: Gaming Operations
 Owner: rickylai
 Operator ID: malianza
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 26

Details of Incident:

Daily Log #: DL20200062693
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Redacted - FINTRAC
 Incident Status: Closed
 Synopsis: Redacted - RCMP first B/I \$9k (50's) on MDB26. WS04.
 Checklist: @19:08hrs Redacted - RCMP C/O \$10615 per C/S Grace at CD19;
 - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 7:02 PM	malianza		
Redacted - RCMP first B/I \$9k (50's) on MDB26. WS04.			

Executive Brief:

Participants Involved:

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:			
Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:			

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200004616

Supplemental Entries:

SP20200011163 Attached by malianza on [Redacted - RCMP] 19:03

Description

Surveillance noticed a large buy-in using \$50 denominational bills for BCLC HRPP patron, [Redacted - RCMP] who has a listed occupation as "Stock Trader [Redacted - RCMP] Company."

Although [Redacted - RCMP] has a longstanding relationship with BC Casinos (subject ID created 2008), [Redacted - RCMP] has limited FINTRAC history with BC RRCR casinos and as per comment on subject file: 2009 DEC 07 BCLC barring for two years for consistent loan shark activities, expiry Nov 3, 2011.

There are some areas of this transaction that could be considered unusual.

1. [Redacted - RCMP] meets [Redacted - RCMP] at SeaHarbor and later meets [Redacted - RCMP] in salon washroom.
2. [Redacted - RCMP] conducts two transactions in a 24hr period using a large amount of \$50 denominational bills.
3. [Redacted - RCMP] has five (5) buy-ins in 2020 that were documented with a daily log that fall below FINTRAC-LCT reportable threshold - DL20200003670 (Jan 2 - \$9K 100s); DL20200013531 (Jan 5 - \$9K 100s); DL20200019316 (Jan 7 - \$9K mixed bills); DL20200041425 (Jan 14 - \$9K 100s); DL20200059878 (Jan 20 - \$9K mixed bills).
4. [Redacted - RCMP] address on subject file - [Redacted - RCMP] does not match valid ID on file - [Redacted - RCMP]. It is unknown which is current.
5. [Redacted - RCMP] has sixteen (16) listed associates with twelve (12) BCLC HRPP or high risk patrons.

Footage shows the following with times approximate:

[Redacted - RCMP] arrives south parkade and parks P6. [Redacted - RCMP] exits vehicle, takes elevator to SeaHarbor Restaurant and waits outside.

At 17:53 [Redacted - RCMP] takes elevator to SeaHarbor Restaurant and meets [Redacted - RCMP]. Both enter SeaHarbor.

At 17:55 [Redacted - RCMP] and [Redacted - RCMP] exits SeaHarbor Restaurant. [Redacted - RCMP] enters BMW and drives off site.

[Redacted - RCMP] enters Salon.

At 17:59 [Redacted - RCMP] and [Redacted - RCMP] enter washroom. At 18:00 [Redacted - RCMP] and [Redacted - RCMP] exit washroom.

At 18:01 [Redacted - RCMP] places bundle of \$50 denominational bills at MDB26 for table buy-in. DLR removes elastic bands and completes the count for a total of \$9K (178x\$50 and 5x\$20). [Redacted - RCMP] receives chips and moves to MDB25 where [Redacted - RCMP] stands behind [Redacted - RCMP] as he games.

At 19:00 it was noticed that [Redacted - RCMP] had a buy-in on 2020-Jan-20 that may be within 24hr FINTRAC reportable and BCLC SOF required time period. TGM LAI was contacted to confirm transactions. After the conversation with TGM LAI [Redacted - RCMP] went to MDB26 and spoke with [Redacted - RCMP] before going to CD19.

At 19:07 [Redacted - RCMP] puts 6x\$1K, 8x\$500, 6x\$100 and 3x\$5 for cashout - \$10,615 and was paid \$212x\$50 and 3x\$5. [Redacted - RCMP] entered washroom with [Redacted - RCMP] at 19:10, exited salon and left site in his Toyota [Redacted - RCMP] at 19:14.

Review of [Redacted - RCMP] transaction.

At 18:20 [Redacted - RCMP] arrives on site south parkade in his Toyota [Redacted - RCMP] and enters salon.

[Redacted - RCMP] and [Redacted - RCMP] (who appears to be waiting for [Redacted - RCMP]) immediately interact.

At 18:22 [Redacted - RCMP] points to MDB25 and [Redacted - RCMP] removes elastic bands and places bundle of bills for table buy-in. Count is completed for a total of \$9.5K (120x\$50 and 35x\$100). [Redacted - RCMP] receives chips and begins game play with [Redacted - RCMP] seated beside [Redacted - RCMP].

After losing chips, [Redacted - RCMP] and [Redacted - RCMP] meet [Redacted - RCMP] and enter smoking lounge. [Redacted - RCMP] and [Redacted - RCMP] leave and briefly enter Phoenix/Poker washroom, after which [Redacted - RCMP] returns to smoking lounge.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200004616

SP20200011163 Attached by malianza on [Redacted - RCMP] 19:03

SP2020001116

3 - Continued-

with [Redacted - RCMP] and [Redacted - RCMP] returns to Salon.

At 19:24 after both [Redacted - RCMP] and [Redacted - RCMP] access their phones in salon lounge, [Redacted - RCMP] exits salon with

[Redacted - RCMP] and both briefly walk on WT5 floor.

At 19:30 both return to salon and [Redacted - RCMP] enters washroom with [Redacted - RCMP] before going to smoking lounge.

At 19:35 [Redacted - RCMP] places 3x\$100 chips at poker for buy-in. [Redacted - RCMP] accesses his phone.

At 23:05 [Redacted - RCMP] accesses his phone, exits salon and drives off site in his [Redacted - RCMP].

[Redacted - RCMP] has the following BCLC Directive: ***BCLC DIRECTIVE*** Effective immediately, patron is not allowed to buy-in at any BCLC site with "un-sourced" cash (all cash without a bank or ATM withdrawal slip) or "un-sourced or borrowed" chips until further notice. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview to discuss further. Daryl Tottenham, Manager AML Programs, BCLC AML Unit.

[Redacted - RCMP] and [Redacted - RCMP] are not listed as associates in BCLC ITRAK and their relationship remains unknown.

Images attached to media for reference.

Footage [Redacted - RCMP] UFT\20-4616

MLIANZA

30068

SP20200011168 Attached by rickylai on [Redacted - RCMP] 20:07

Description

On [Redacted - RCMP] at approx 1835 hrs, Management was notified by Surveillance that Patron [Redacted - RCMP] has reached over \$10K threshold within 24 hours period.

[Redacted - RCMP] B/I as following:

[Redacted - RCMP] @ 18:25 for \$9500.

[Redacted - RCMP] @ 18:10 for \$9,000

[Redacted - RCMP] was approached for receipt but cannot provide any. [Redacted - RCMP] was asked to cash out the remaining chips and offered E-transaction but declined. [Redacted - RCMP] was asked to leave 24 hours.

All departments are informed.

GPEB 19759

LAI, Ricky

RRC TGM

SP20200011354 Attached by stolee on [Redacted - RCMP] 06:29

Description

The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200004616

SP20200011354 Attached by stolon on [Redacted - RCMP] 06:29

SP2020001135

4 - Continued-

- No receipt was presented at the time of transaction.
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators.
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On [Redacted - RCMP] writer reviewed this incident, surveillance footage shows that on the date of [Redacted - RCMP] at 1822:49 hrs patron identified as [Redacted - RCMP] was seen buying-in on MDB25 for \$9,500. [Redacted - RCMP] produced \$6,000 in \$50 bills and \$3,500 in \$100 bills and begins to play. On [Redacted - RCMP] at 1801:05 hrs [Redacted - RCMP] arrived on MDB26 and bought in for \$9,000 and begins to play. [Redacted - RCMP] was later approached by site management and was unable to provide receipt therefore [Redacted - RCMP] was asked to cash out.

In this case [Redacted - RCMP] was able to buy-in for over the \$10,000 threshold (during two gaming days), it does not make the cash he attempted to use or these circumstances suspicious.

A review of [Redacted - RCMP] subject profile was done [Redacted - RCMP] have been generating LCTR since May/2008 with past buy-in ranging from \$10,000 to \$21,500 per gaming session.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [Redacted - RCMP] or the funds he attempted to use/used on this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200004616

SP20200011354 Attached by stolee on [Redacted - RCMP] 06:29

SP2020001135

4 - Continued-

Stone LEE

BCLC Investigator

SP20200020777 Attached by stolee on [Redacted - RCMP] 07:56

Description

[Redacted - RCMP]

In reviewing incident #7123 and #7674 it is determined that due to the suspicion and circumstances involving [Redacted - FINTRAC] and [Redacted - FINTRAC]

[Redacted - FINTRAC]

[Redacted - FINTRAC]

Stone LEE

BCLC Investigator

SP20200023651 Attached by sbeeksma on [Redacted - RCMP] 07:21

Description

On [Redacted - RCMP]

copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Appendix 27

iTrak incident report bearing the Incident File #IN20200005173 (BCLC0016418).

Incident File Full Report

[Incident File #IN20200005173](#)

Date/Time Occurred: [Redacted] 12:00 AM
 Day of Week Occurred: [Redacted]
 Date/Time Created: [Redacted] 11:26 AM
 Date/Time Closed: [Redacted] 7:03 AM
 Closed By: stoele

Record Creation Details

Department: Surveillance
 Owner: fumisato
 Operator ID: fumisato
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 31

Details of Incident:

Daily Log #: DL20200069480
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: [Redacted - FINTRAC]
 Incident Status: Closed
 Synopsis: UFT: [Redacted - RCMP] Table Cash Buy in for \$ 5 K in \$ 50.00 Bills - Total Buy in \$ 9.5 K -
 Ws-10 - Mon.2 - D/S Anthony

Checklist:

(Earlier Buy in at 22:35 hrs at MDB-24 for \$ 4.5 K with 25 of \$ 100 Bills & 40 of \$ 50 Bill)
 - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 11:26 AM	fumisato		

[Redacted - RCMP] conducted table cash buy in for \$5,000 (100x\$50 bills), total
 buy ins \$ 9,500

Earlier buy in at 2235hrs on MDB24 for \$4,500 (25x\$100, 40x\$50 bills)

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005173

Participants Involved:

Subject

Full Name:		Company:	Redacted
Role:			
Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:			
Full Name:		Company:	
Role:			

Supplemental Entries:

SP20200012488 Attached by fumisato on Redacted - RCMP 11:30

Description Redacted - RCMP Surveillance conducted a review of buy ins for Redacted - RCMP Redacted - RCMP (glasses, blue jeans) who conducted table cash buy in for \$5,000 (100x\$50 bills) on gaming table MDB31 last night Redacted - RCMP at 0000hrs, total buy ins \$ 9,500. Earlier buy in at 2235hrs on MDB24 for \$4,500 (40x\$50, 25x\$100 bills).

UFT incident opened due to a possible drop off of cash.

Review showed the following for the 1st cash buy in starting on Redacted - RCMP

2235hrs Redacted presents cash buy in for the amount of \$4,500 (40x\$50, 25x\$100 bills) on gaming table MDB24

Review showed the following for the 2nd cash buy in starting on Redacted - RCMP

2346hrs Redacted and another patron Redacted - RCMP wearing black blazer, green dress pants) are waiting in Salon room with no play. Redacted receives a call on his cell phone and both Redacted and Redacted leave Salon room together

2350hrs Redacted and Redacted walk to South hotel valet area and meet up with another person Redacted - RCMP Redacted - RCMP wearing all black) driving a Redacted BMW SUV with unreadable license plate parked there. Subject 1 passes something to Redacted while Redacted passes a white item back to Subject 1. Redacted puts received item into his inner jacket pocket. Both Redacted and Redacted enter South Hotel lobby and walk back to Salon room together

2353hrs Redacted and Redacted enter Salon room and Redacted enters Salon washrooms followed by Redacted

2354hrs Redacted exits Salon washroom and walks to gaming table MDB31 and presents a cash buy in for the amount of \$5,000 (100x\$50 bills).

Redacted is observed making substantial bets while Redacted does not conduct any buy ins or play but only

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005173

SP20200012488 Attached by fumisato on [Redacted - RCMP] 11:30

SP2020001248

8 - Continued-

watches [Redacted - RCMP] play.

[Redacted - RCMP] arrived on site at 2145hrs driving a [Redacted - RCMP] Toyota [Redacted - RCMP] and parking in South parking lot with two other associates.

Footage saved to M: [Redacted - RCMP] (UFT)

Fumi SATO - 23495

SP20200014189 Attached by stolee on [Redacted - RCMP] 05:13

Description

The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On [Redacted - RCMP] writer reviewed this incident, surveillance footage shows that on the date of [Redacted - RCMP] at 21:45 hrs patron identified as [Redacted - RCMP] arrived at the south parkade in a [Redacted - RCMP] colored Toyota [Redacted - RCMP] along with his associate identified as [Redacted - RCMP] and an unidentified male associate. All three patrons exited the vehicle and headed towards the skywalk.

At 2231:31 hrs [Redacted - RCMP] arrived on MDB24 and bought in for \$4,500 (\$2500 in \$100 bills and \$2,000 in \$50 bills). [Redacted - RCMP] received the gaming chips and was seen playing on various tables while his associate identified as [Redacted - RCMP] watched on.

At 2347:35 hrs [Redacted - RCMP] appears to receive a call on his cell and was seen heading out of the Salon

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005173

SP20200014189 Attached by stolee on [Redacted - RCMP] 05:13

SP2020001418

9 - Continued-

followed by [Redacted - RCMP].

At 2347:56 hrs a [Redacted - RCMP] colored BMW SUV arrived at the hotel driveway. (surveillance camera was unable to obtain the plate number)

At 2350:33 hrs [Redacted - RCMP] was seen approaching the vehicle from the back while the driver exited the vehicle and met with [Redacted - RCMP]. the unidentified driver was seen handing unknown object with both hands to [Redacted - RCMP]. [Redacted - RCMP] was seen passing unknown object from his jacket to the driver. After the exchange [Redacted - RCMP] and [Redacted - RCMP] headed back to the hotel elevator while the BMW proceed to drive off site.

At 2353:24 hrs [Redacted - RCMP] was seen entering the Salon washroom while [Redacted - RCMP] walked towards MDB24.

At 2353:40 hrs [Redacted - RCMP] entered the washroom.

At 2354:23 hrs [Redacted - RCMP] exited the washroom. (it is noted that there was two other patrons that had exited from the washroom prior to [Redacted - RCMP] exiting)

At 2354:47 hrs [Redacted - RCMP] exited the washroom

At 23:54 hrs [Redacted - RCMP] arrived on MDB31 and bought in for \$5,000 in \$50 bills and continues to play on various table.

In this case [Redacted - RCMP] was able to buy-in for total of \$9,500 (\$7,000 in \$50 bills) which is under the \$10,000 threshold therefore [Redacted - RCMP] was not approached for receipt. It is noted that it's not out of the norm for patron to have large amount of \$50 denomination bills during Chinese New Years as red symbol "Luck". It is also noted that no passing of funds were observed during [Redacted - RCMP] visit. Although [Redacted - RCMP] has seen meeting up with someone, it is noted it was a "exchange" rather than a "drop off"

It must be noted that there is no conclusive indication that the \$5,000 [Redacted - RCMP] used for the buy-in had came from other source.

A review of [Redacted - RCMP] subject profile was done [Redacted - RCMP] have been generating LCTR since May/2008 with past buy-in ranging from \$10,000 to \$21,500 per gaming session.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [Redacted - RCMP] or the funds he used on this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

BCLC and site surveillance will continue to monitor [Redacted - RCMP] activities with-in the casinos.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE

BCLC Investigator

SP20200015342 Attached by sbekksma on [Redacted - RCMP] 09:17

Description On [Redacted - RCMP] copies of this reports narrative were transferred to the SFTP for GPBE, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:33 PM

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Appendix 27

Incident File Full Report

[Incident File #IN20200005173](#)

SP20200020778 Attached by stolee on [Redacted - RCMP] 8:00

Description

[Redacted - RCMP]

In reviewing incident #7123 and #7674 it is determined that due to the suspicion and circumstances involving [Redacted] and [Redacted]

[Redacted - FINTRAC]

[Redacted - FINTRAC]

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:33 PM

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Appendix 27

Appendix 28

iTrak incident report bearing the Incident File #IN20200005354 (BCLC0016419).

Incident File Full Report

Incident File #IN20200005354

Record Creation Details

Date/Time Occurred: 1/25/2020 12:04 AM
 Day of Week Occurred: Saturday
 Date/Time Created: 1/25/2020 12:06 AM
 Date/Time Closed: 1/31/2020 12:48 PM
 Closed By: stolee

Department: Gaming Operations
 Owner: alaw
 Operator ID: jdempsey
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 06

Details of Incident:

Daily Log #: DL20200072721
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: SID# 287486 - PERSON INFORMATION - 23:04hrs \$9,000 buy in with \$100's on MDB 01. 00:01hrs
 \$2,100 buy in with \$100's on MDB 06 - triggered an SOF refusal.

Checklist: DJX checked by J.DEMPSEY
 - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/25/2020 12:06 AM	jdempsey		

SID# 287486 - PERSON INFORMATION - 23:04hrs \$9,000 buy in with \$100's on MDB 01. 00:01hrs
 \$2,100 buy in with \$100's on MDB 06 - triggered an SOF refusal.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005354

Participants Involved:

Personnel

Full Name: ZHOU, Leon Cong Xuan Property: River Rock (GCC)
 Role: Documenter Department: Tables

Subject

Full Name: PERSONAL INFORMATION Company:
 Role: Accused

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
PERSONAL INFORMATION	Ban	1/25/2020	1/25/2020
Type Of Ban:	Site Barring	Notes:	
Reason For Ban:			
Identification:	Drivers License		

Supplemental Entries:

SP20200012832 Attached by leonzhou on Jan 25, 2020 00:19

Description At approx 23:55, writer was informed of patron PERSONAL INFORMATION SID#287486, who had a running balance of \$9,000, bought in \$2,100 on MDB 6 and was approved by DSV due no Encore Card. SOF was missed due to multiple B/I locations. After the incident has been discovered, writer approached PERSON and asked to provide receipt, which PERSON was unable to. PERSON was asked to cash out the remaining chips and asked to leave for due to SOF Refusal. PERSON was explained about our SOF policies and left site without further incident.

Patron unable to provide receipt due to the money was from currency exchange in China, and they did not carry the receipt with them.

TGM ZHOU, Leon
72827

SP20200012854 Attached by jdempsey on Jan 25, 2020 01:12

Description 23:49hrs G/M Leon informed surveillance that SID# 287486 - PERSONAL INFORMATION was attempting to buy in \$2,100 using \$100 bills on MDB 06 but couldn't provide a receipt. His total buy in's went over \$10,000 and this triggered an SOF refusal. A 24 hour site barring was issued. Leon mentioned the cash was from China and this is why he didn't have a receipt.

Form 86 sent
 Saved to M: JAN / SOF refusal.
 J.DEMPSEY 23874

SP20200014192 Attached by stolee on Jan 27, 2020 05:15

Description The individual and associates of the individual who conducted the transaction(s) have no adverse

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:35 PM

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Incident File Full Report

Incident File #IN20200005354

SP20200014192 Attached by stoles on Jan 27, 2020 05:15

SP2020001419

2 - Continued-

media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction
- Patron may be unaware of requirement to source funds via receipts.
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On Jan/22/2020 writer reviewed this incident, surveillance footage supports what has been documented in this file.

In this case patron identified as [PERSONAL INFORMATION] (SID#142438) was able to buy-in for \$2,100 in \$100 bills on MDB6 which put him over the \$10,000 threshold with in 24 hrs. [PERSON] was later approached by site management and was unable to produce receipt, therefore [PERSON] was ask to cash out.

Although [PERSON] was able to buy-in for \$2,100 and unable to produce receipt, it does not make the cash he attempted to use or these circumstances suspicious.

A review of [PERSON] subject profile was done. [PERSON] has no prior history on file. [PERSON] appears to be visiting from China and is new to BC Casino.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSON] or the funds he attempted to use on this date is linked to criminal activity the investigator will not be

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200005354](#)

SP20200014192 Attached by stolee on Jan 27, 2020 05:15

SP2020001419

2 - Continued-

submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE

BCLC Investigator

SP20200046410 Attached by stolee on Jun 30, 2020 15:34

Description

As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

Appendix 29

iTrak incident report bearing the Incident File #IN20200005745 (BCLC0016420).

Incident File Full Report

Incident File #IN20200005745

Record Creation Details

Date/Time Occurred: 1/25/2020 8:53 PM
 Day of Week Occurred: Saturday
 Date/Time Created: 1/26/2020 12:49 PM
 Date/Time Closed: 1/27/2020 2:29 PM
 Closed By: glau

Department: Surveillance
 Owner: malianza
 Operator ID: malianza
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 03

Details of Incident:

Daily Log #: DL20200075426
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: SID 174250 | \$4k (100s) cash b/i on MDB03 total accum \$10.6k - approved by TGM Eric
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/26/2020 12:49 PM	malianza	1/26/2020 4:32 PM	malianza
<div style="background-color: black; color: white; padding: 2px;">PERSONAL INFO</div> SID 174250 \$4k (100s) cash b/i on MDB03 total accum \$10.6k			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005745

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC
Full Name:	LO, Anthony Paul	Property:	River Rock (GCC)
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	

Subject

Full Name:	PERSONAL INFORM	Company:	UBC - Language
Role:	Patron		
Full Name:	PERSONAL INFORM	Company:	Gui Zang Zi Jian
Role:	Patron		

Supplemental Entries:

SP20200013832 Attached by malianza on Jan 26, 2020 12:51

Description Surveillance was advised of a large buy-in for PERSONAL INFORM (SID 174250) who has a listed occupation as "Manager Real Estate Company - Gui Zang Zi Jian."

Although this buy-in is within PERSONAL average buy-in play, there are some areas of this transaction that could be considered unusual.

1. PERSONAL was picked up/dropped off by a vehicle.
2. PERSONAL arrived on site with UNAM.
3. PERSONAL has limited gaming activity since 2018.
4. PERSONAL used primarily \$50 denominational bills prior to recycling casinos funds.

Footage shows the following with times approximate:

Jan 24

At 15:50 PERSONAL is dropped off by an unknown vehicle (possible BMW) on River Rd. PERSONAL enters casino east entrance and continues to Dogwood Baccarat Room-MDB03 and places \$1K (20x\$50) for table buy-in. PERSONAL receives chips and begins to game.

At 17:25 PERSONAL cashes out \$2055 at CD08 and leaves site as a passenger in a BMW.

Jan 25

At 15:55 PERSONAL dropped off by a BMW at casino west valet area.

At 15:57 PERSONAL bought in MDB03 for \$1K (7x\$100, 6x\$50), received chips and began game play.

At 16:28 PERSONAL bought in MDB03 for \$3.6K (72x\$50), received chips and continued to game.

At 17:19 PERSONAL cashes out \$6.6K in chips at CD12. PERSONAL is picked up outside casino west entrance by a BMW.

At 20:12 PERSONAL and UNAM (red jacket) are dropped off by a BMW resort valet, enter casino east entrance and PERSONAL places \$2K (20x\$100) at MDB03 for table buy-in.

At 20:40 PERSONAL places \$4K (40x\$100) for table buy-in at MDB03. PERSONAL receives chips and continues to game.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:36 PM

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Appendix 29

Incident File Full Report

Incident File #IN20200005745

SP20200013832 Attached by malianza on Jan 26, 2020 12:51

SP2020001383

2 - Continued-

At 23:20 BMW leaves site with [PERSON] and UNAM (red jacket) as passengers.

BMW (l/p EJ133L) which is associated in iTRAK to BCLC HRPP patron [PERSONAL INFORM] (SID 210441).
 SID 210441 has seven (7) return of PGF incidents and one (1) substantiated UFT incident. SID 210441 has two associates, both of which are associated with UFT reports and one how is categorized as a BCLC HRPP patron.

Images to media.

Footage JAN20\UFT\20-05745

MLIANZA

30068

SP20200014476 Attached by glau on Jan 27, 2020 14:28

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- Buy-in(s) reasonably linked to a casino disbursement within the same site or Service Provider
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved in line with or less than past buy in amounts
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No direct involvement in substantiated UFT incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Large Buy In

Name: [PERSONAL INFORM]

BCID: Passport # [PERSONAL INFORM]

BCLC SID: 174250

DOB: [PERSONAL INFORMATION]

Address: [PERSONAL INFORMATION]

Home Phone Number: N/A

Occupation: Manager for real estate company – Gui Zang Zi Jian

Encore/ Gold Card: N/A

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005745

SP20200014476 Attached by glau on Jan 27, 2020 14:28

SP2020001447

6 - Continued-

ITRACK profile (Started in 2015-MAR-26) – 2 Incidents, 2 UFTs, 0 Substantiated, 4 Media, 0 vehicles, 0 Associates

LCTs (15) – Past Buy in Range \$5000 - \$17,000. Buy in total \$131,060. Disbursement \$198,235.

SYNOPSIS:

On 2020-JAN-25, new patron [PERSONAL INFO] (SID # 174250) was at the Riverrock Casino in Richmond, BC. [PERSONAL INFO] had multiple buy ins (5) at MDB03. The total amount of [PERSONAL INFO] buy in was \$10,600. [PERSONAL INFO] seen gaming normally at MDB 03.

SURVEILLANCE:

2020-JAN-24

15:50 hrs - [PERSONAL INFO] is dropped off by an unknown vehicle (possible BMW) on River Rd. [PERSONAL INFO] enters casino east entrance and continues to Dogwood Baccarat Room-MDB03 and places \$1K (20x\$50) for table buy-in. [PERSONAL INFO] receives chips and begins to game.

17:25 hrs - [PERSONAL INFO] cashes out \$2055 at CD08 and leaves site as a passenger in a BMW.

2020-JAN-25

15:55 [PERSONAL INFO] dropped off by a BMW at casino west valet area.

15:57 [PERSONAL INFO] bought in MDB03 for \$1K (7x\$100, 6x\$50), received chips and began game play.

16:28 [PERSONAL INFO] bought in MDB03 for \$3.6K (72x\$50), received chips and continued to game.

17:19 [PERSONAL INFO] cashes out \$6.6K in chips at CD12. [PERSONAL INFO] is picked up outside casino west entrance by a BMW.

20:12 [PERSONAL INFO] and UNAM (red jacket) are dropped off by a BMW resort valet, enter casino east entrance and [PERSONAL INFO] places \$2K (20x\$100) at MDB03 for table buy-in.

20:40 [PERSONAL INFO] places \$4K (40x\$100) for table buy-in at MDB03. [PERSONAL INFO] receives chips and continues to game.

23:20 BMW leaves site with [PERSONAL INFO] and UNAM (red jacket) as passengers.

CONCLUSION/ACTIONS TAKEN

The investigator reviewed the information provided by the casino and determined the following:

Very limited activity in BC Casinos. 2 incidents only

15 LCTs since 2015

Nothing irregular noted while gaming at the casino

buy-in is within [PERSONAL INFO] average buy-in play

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200005745

SP20200014476 Attached by glau on Jan 27, 2020 14:28

SP2020001447

6 - Continued-

The funds used by PERSON appears to be recycle funds from previous gaming activities.

PERSONA listed occupation as a manager of a real estate company could reasonably explain his SOF/SOW

This incident is not a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10 as the funds used by PERSON could be sourced back to his previous disbursements.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest PERSON or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

SP20200014785 Attached by sbEEKSMA on Jan 28, 2020 05:54

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

Appendix 30

iTrak incident report bearing the Incident File #IN20200006109 (BCLC0016421).

Incident File Full Report

[Incident File #IN20200006109](#)

Record Creation Details	
Date/Time Occurred:	1/27/2020 11:51 PM
Day of Week Occurred:	Monday
Date/Time Created:	1/28/2020 9:56 AM
Date/Time Closed:	1/31/2020 2:58 PM
Closed By:	glau
Department:	Surveillance
Owner:	malianza
Operator ID:	malianza
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation: MDB 07

Details of Incident:

Daily Log #: DL20200081992

Type: Gaming

Specific: Unusual Financial Transaction

Category: Unsubstantiated

Incident Status: Closed

Synopsis: SID 87711 PERSONAL INFORMATION B/I \$9K (50s) at MDB 7 as per DS Elaine

Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/28/2020 9:56 AM	malianza		
SID 87711 PERSONAL INFORMATION	B/I \$9K (50s) at MDB 7 as per DS Elaine		

Executive Brief:

Participants Involved:

Subject

Full Name:	PERSONAL INFORMATION	Company: CEO - Fuan Mining Company
Role:	Patron	

Full Name:	PERSONAL INFORMATION	Company:
Role:	Patron	

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

Supplemental Entries:

SP20200014846 Attached by malianza on Jan 28, 2020 09:57

Description

Surveillance noticed a large buy-in for:

PERSONAL INFORMATION (SID 87711) who has a listed occupation as "housewife" and address of PERSONAL INFORMATION

PERSONAL INFORMATION and her associate,

PERSONAL INFORMATION (SID 73504) who has a listed occupation as "Owner Trading Business of Raw Materials" and address PERSONAL INFORMATION.

Although PERSONAL INFORMATION has limited FINTRAC level gaming history at BC-RRCR Casino and PERSONAL INFORMATION appears to be a seasonal player, there are some areas of this transaction that could be considered unusual.

1. PERSONAL INFORMATION occupation does not readily aid in sourcing her level of wealth. 3.1.16 Client's occupation does not match the level or type of play with no known explanation for the difference.
2. PERSONAL INFORMATION has one associate; however, their although there relationship is unknown.
3. PERSONAL INFORMATION and PERSONAL INFORMATION remove some bills from their buy-in, which allows the individual buy-in totals to fall below FINTRAC-LCT reportable threshold and BCLC SOF requirements. 3.1.24 Client appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds.
- 3.1.25 Client appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds.
4. PERSONAL INFORMATION used a bundle of bills that were bound with elastic bands that did not originate from a recognized financial institution, such as a bank, atm, global cash&win and the transaction occurred outside usual banking hours. 3.1.11 Client has access to large amounts of cash after banking hours on short notice.
5. It would be considered unusual for a BC Casino to issue a large casino disbursement using \$50 denominational bills.
6. PERSONAL INFORMATION and PERSONAL INFORMATION buy-in are suspected of originating from the same source and will be documented in this report. The combined total will exceed FINTRAC-LCT reportable threshold and BCLC reporting requirements.
7. PERSONAL INFORMATION occupation could aid in sourcing a level of wealth; however, the occupation could be considered vague. 3.1.26 Client provides doubtful or vague information.
8. Although PERSONAL INFORMATION has been involved in previous UFT reports, most recently, IN20190064704 unsubstantiated report, could demonstrate the PERSONAL INFORMATION is a seasonal player.
9. PERSONAL INFORMATION has one associate who has recently received a BCLC Prohibition (SID 51134). 3.1.4 Client has known associates who are deemed suspicious by the gaming facilities.

Footage shows the following with times approximate:

At 23:33 PERSONAL INFORMATION arrives on site with PERSONAL INFORMATION (SID 73504) in a Porsche Cayenne (l/p GM827J) south parkade.

PERSONAL INFORMATION enters salon and PERSONAL INFORMATION enters casino east entrance on her phone, continues to MapleLeaf and then to Dogwood Baccarat Room on her phone.

At 23:44 PERSONAL INFORMATION removes some \$50 denominational bills from the bundle and places the bundle of \$50 bound with elastic bands at MDB27 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). PERSONAL INFORMATION receives chips and begins to game.

At 23:41 PERSONAL INFORMATION on her phone at the back wall before removing some \$50s from her bundle and places the bundle bound with elastics for table buy-in. DLR completes the count for a total of \$9K (180x\$50).

After receiving chips, PERSONAL INFORMATION accesses her phone at 23:58 in Dogwood Baccarat Room and again at 00:03 outside Maple Leaf Baccarat Room. PERSONAL INFORMATION has not participated in gaming activity.

At 00:29 YAN enters salon and begins gaming alongside PERSONAL INFORMATION at MDB27, albeit with \$100

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

SP20200014846 Attached by malianza on Jan 28, 2020 09:57

SP2020001484

6 - Continued-

denominational chips.

At 01:00 **PERSON** removes high value chips (\$500 and \$1000) from her pocket and chip changes 6x\$500 and receives 3x\$1K chips. **PE** also passes some \$1K chips to **PERSON** **PERSON** places these \$1K chips into her pocket.

At 04:55 **PE** chips changes 45x\$1K and receives 9x\$5K chips.

At 05:05 **PE** cashes out 8x\$5K chips at CD19 and receives 400x\$100 bills. **PERSON** does not cash out and is on her phone during **PERSON** casino disbursement.

Total buy-in of \$18.9K using 378xC\$50 denominational bills.

PERSON is the driver of the Porsche.

Footage JAN20\UFT\20-06109

MLIANZA

30068

SP20200016717 Attached by glau on Jan 31, 2020 14:57

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Refused SOF Request.

2020-JAN-27

Patrons **PERSONAL INFORMATION** (f) SID #887711 and **PERSONA** (m) SID # 73504 arrived together at the Riverrock casino. **PERSON** and **PERSON** started off gaming separately and eventually gamed to the same Bacarrat table. **PE** bought in for \$9,900 (198x\$50) to start his gaming at MDB27 **PERSON** bought in for \$9,000 (180x\$50) at MDB7. **PERSON** buys in but leaves the table without gaming.

PERSON eventually meets up with **PE** at MDB27 and started gaming. **PE** eventually cashes out for \$45,000 and leave the casino with **PERSON** **PERSON** did not cash out her chips.

SURVEILLANCE:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

SP20200016717 Attached by glau on Jan 31, 2020 14:57

SP2020001671

7 - Continued-

2020-JAN-27/28

At 23:33 - **PERSON** arrives on site with **PERSONAL INFO** (SID 73504) in a Porsche Cayenne (l/p GM827J) south parkade.

23:44 - **PE** removes some \$50 denominational bills from the bundle and places the bundle of \$50 bound with elastic bands at MDB27 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). **PE** receives chips and begins to game.

23:41 - **PERSON** on her phone at the back wall before removing some \$50s from her bundle and places the bundle bound with elastics for table buy-in. DLR completes the count for a total of \$9K (180x\$50).

After receiving chips, **PERSON** accesses her phone at 23:58 in Dogwood Baccarat Room and again at 00:03 outside Maple Leaf Baccarat Room. **PERSON** has not participated in gaming activity.

At 00:29 **PERSON** enters salon and begins gaming alongside **PE** at MDB27, albeit with \$100 denominational chips.

At 01:00 - **PERSON** removes high value chips (\$500 and \$1000) from her pocket and chip changes 6x\$500 and receives 3x\$1K chips. **PE** also passes some \$1K chips to **PERSON**. **PERSON** places these \$1K chips into her pocket.

At 04:55 - **PE** chips changes 45x\$1K and receives 9x\$5K chips.

At 05:05 - **PE** cashes out 8x\$5K chips at CD19 and receives 400x\$100 bills. **PERSON** does not cash out and is on her phone during **PE** casino disbursement.

CONCLUSION:

The BCLC directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case patron identified as **PERSONAL INFO** (SID#73504) had bought-in for \$9,900 in \$50 bills which is under the \$10,000 threshold with-in the 24 hrs therefor patron was not approached for receipt. Patron **PERSON** also had bought-in for \$9,000 in \$50 bills which is under the \$10,000 threshold with-in the 24 hrs therefor patron was not approached for receipt also. The total buy in for both **PERSON** and **PE** were \$18.9K using 378xC\$50 denominational bills.

There were no irregularities detected in either **PERSON** or **PERSON** play in the casino.

Although **PE** and **PERSON** was able to buy-in for \$9,900 and \$9,000 and was not approached for provide receipts, it does not make the cash they used or these circumstances suspicious.

A review of **PERSON** subject profile was done, **PE** has no substantiated UFT on file, **PE** have been generating LCTR since Nov/2009 with past buy-in ranging from \$8500 to \$230,000 per gaming session.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

SP20200016717 Attached by glau on Jan 31, 2020 14:57

SP2020001671

7 - Continued-

A review of **PERSONA** subject profile was done. **PERSON** has 2 incidents on iTRAK. One incident 2019-7549 shows **PERSON** passing chips to **PER PERSON** also have 2 LCTs.

PERSONA occupation does not readily aid in sourcing her level of wealth. **PERSON** stated that she is a housewife. Due to the lack of history in BC casinos for **PERSON** the writer is unable to link any suspicious funds to her.

As for **PER** his stated occupation as an owner of a raw material trading company could reasonable explain his SOF/SOW.

There is no information to indicate that **PER** or **PERSONA** funds were likely sourced from the proceeds of crime or that their activities at the Riverrock Casino on 2020-JAN-27/28 was anything other than an attempt at legitimate gambling.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest **PER** or **PERSON** or the funds they attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

SP20200018308 Attached by sbEEKSMA on Feb 3, 2020 06:29

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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Appendix 30

Appendix 31

iTrak incident report bearing the Incident File #IN20200006138 (BCLC0016422).

Incident File Full Report

[Incident File #IN20200006138](#)

Record Creation Details

Date/Time Occurred: 1/24/2020 12:17 AM
Day of Week Occurred: Friday
Date/Time Created: 1/28/2020 12:48 PM
Date/Time Closed: 1/31/2020 2:53 PM
Closed By: glau

Department: Surveillance
Owner: malianza
Operator ID: malianza
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: MDB 03

Details of Incident:

Daily Log #: DL20200069521
Type: Gaming
Specific: Unusual Financial Transaction
Category: Unsubstantiated
Incident Status: Closed
Synopsis: PERSONAL INFORMATION (no SID) \$7k cash BI (100x\$20s 100x\$50s) D/S John c1141
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/28/2020 12:48 PM	malianza		
PERSONAL INFORMATION (no SID) \$7k cash BI (100x\$20s 100x\$50s) D/S John			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC
Full Name:	GAJIC, Velibor	Property:	River Rock (GCC)
Role:	Notified	Department:	Tables
Full Name:	SUE, Randy	Property:	River Rock (GCC)
Role:	Other	Department:	Operations
Full Name:	LU, Hou (Michael) Cai	Property:	River Rock (GCC)
Role:	Other	Department:	Tables

Subject

Full Name:	PERSONAL INFORMATION	Company:	JIN XIN Construction Company
Role:	Patron		

Supplemental Entries:

SP20200014898 Attached by malianza on Jan 28, 2020 12:49

Description Surveillance noticed buy-ins associated with an unknown male individual which falls below FINTRAC-LCT reportable threshold and BCLC SOF requirements. Although this individual may have an occupation that could aid in sourcing his wealth, there are some areas of this transaction that could be considered unusual.

(1) Buy-ins fall below and outside reportable thresholds (2) Patron is picked up and dropped off by various vehicles at different times of the day (3) Transactions fall outside usual banking hours (4) Patron does not cash out chips (5) Individual and associates are unknown (6) SOF and SOW is yet to be confirmed.

Patron name: PERSONAL INFORMATION (no known subject ID)

Patron Encore Card Acct: 2798387 - PERSONAL INFORMATION

Associates: 2 x UNAF - UNAF1 (possibly wife) and UNAF2 (possibly daughter).

2020 JAN 21 - DL20200060560 @ 00:27 total buy-ins reach \$9.8K in mixed bills (\$100s and \$50s).

Available footage shows the following with times approximate: Jan 20 @ 23:45 PERSONAL receives chips from his \$3K (30x\$100) MDB08 table buy-in and continues to game. Jan 21 @ 00:25 VIP Host SUE speaks with PERSONAL who counts \$50 denominational bills, removes some from his bundle, and places \$50s for table buy-in. Count completed for \$1.8K (36x\$50). PERSONAL receives chips and continues to game. Jan 21 @ 01:02 PERSONAL and associates enter an awaiting Mercedes (l/p unavailable) outside west entrance and driven off site via No3 Rd. Driver appears to be an UNAF.

2020 JAN 22 - DL20200064754 @ 12:30 total buy-ins reach \$9.8K in mixed bills (\$100s, \$50s and \$20s).

Available footage shows the following with times approximate: Jan 22 @ 12:05 PERSONAL and

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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Appendix 31

Incident File Full Report

Incident File #IN20200006138

SP20200014898 Attached by malianza on Jan 28, 2020 12:49

SP2020001489

8 - Continued-

associates are dropped off by an unknown individual in Mercedes SUV (l/p not available). Driver appears to be an UNAM.

At 12:10 PERSONAL counts \$100s and \$50s and UNAF1 passes bundle of \$20s (bills were bound elastics) to PERSONAL. PERSONAL passes all currency to dealer for table buy-in at MDB05. DLR completes the count for a total of \$7K (100x\$20, 60x\$50, 20x\$100).

PERSONAL receives chips and begins to game.

At 15:25 PERSONAL and his associates are outside east entrance on their phone and appear to be waiting for someone.

From 15:33 to 15:51 UNAF2 makes several transactions at two ATM machines with PERSONAL and UNAF1 nearby. All three individuals periodically view their cellphones during the transactions. After the transactions, UNAF1 passes all currency to PERSONAL.

At 16:10 PERSONAL places \$3K (30x\$100) at MDB05 for table buy-in; however, DSV LU speaks with PERSONAL and PERSONAL removes 2x\$100 bills from the buy-in. DLR completes the count for a total of \$2.8K (28x\$100), with PERSONAL receiving chips and begins game play.

At 16:42 Mercedes SUV (l/p JF807H) enters west parkade and parks in a location that PERSONAL and associates were last seen before a Mercedes SUV leaves site.

2020 JAN 24 - DL20200069521 - JAN 24 @ 00:17 total buy-ins reach \$7K in mixed bills (\$100s, and \$50s).

Available footage shows the following with times approximate: Jan 23 @ 23:50 Mercedes (l/p JF807H) enters west parkade and PERSONAL exits driver side with UNAF2 as passenger. PERSONAL places a losing \$500 chip wager on MDB05 and PERSONAL and UNAF2 access their phones. Jan 24 @ 00:00 PERSONAL counts mixed bills and places \$7K in mixed bills for table buy-in at MDB03, using \$50s and \$20s denominational bills which were separated by individual elastic bands. DLR removes elastic bands, and completes the count for \$7K (100x\$50 and 100x\$20). PERSONAL receives chips and begins game play.

At 01:53 PERSONAL chip changes 32x\$500 for 16x\$1K.

At 02:00 PERSONAL exits casino west entrance with UNAF2 and drives UNAF2 off site in Mercedes SUV. PERSONAL does not cash out chips.

2020 JAN 27 - Review shows PERSONAL on site at 10:45 dropped off outside west entrance by a (possible) Toyota sedan enter casino west entrance with UNAF1, sits at MDB05, removes chips from his pocket (\$1K chips value) and begins to game. During this gaming sessions, PERSONAL wins approximately \$25K in chips at MDB05. PERSONAL leaves the table, counts his chips, puts them in his pocket (15:28) and does not cash out these chips before leaving site. PERSONAL and his UNAF are picked up by an Honda sedan (l/p unavailable) outside west entrance at 15:45.

Images of individual (PERSONAL INFORMATION), his two female associates and vehicles attached to media for reference.

Subject File-LNU opened for PERSONAL and comment to attempt to identify PERSONAL on his next visit.

Footage JAN20\UFT\20-06138

MLIANZA
30068

SP20200014923 Attached by malianza on Jan 28, 2020 14:11

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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Appendix 31

Incident File Full Report

Incident File #IN20200006138

SP20200014923 Attached by malianza on Jan 28, 2020 14:11

SP2020001492

3 - Continued-

Description "Update 2020-JAN-28"

Surveillance noticed UNAM on site and requested TGM GAJIC to attempt to identify the individual in question. GAJIC approached and obtained necessary information.

Footage added to folder.

MLIAZNA

30068

SP20200016715 Attached by glau on Jan 31, 2020 14:53

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No direct involvement in substantiated UFT incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Buy In below reportable threshold

Name: PERSONAL INFORMATION

BCID: CHN Passport # PERSONAL INFORMATION

BCLC SID: 287786

DOB: PERSONAL INFORMATION

Address: PERSONAL INFORMATION

Home Phone Number: N/A

Occupation: N/A

Encore/ Gold Card: N/A

ITRACK profile (Started in 2020-JAN-28)) – 1 Incidents, 1 UFTs, 2 Media

LCT – None

SUMMARY:

New Patron PERSONAL INFORMATION (SID # 287786) was gaming at the Riverrock Casino in Richmond, BC. PERSONAL INFORMATION was at the casino on Jan 21, 22, 24 and 27 2020. PERSONAL INFORMATION was observed by surveillance to

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

SP20200016715 Attached by glau on Jan 31, 2020 14:53

SP2020001671

5 - Continued-

be gaming at the Baccarat Tables. There was nothing unusual detected regarding [PERSONAL IN] gaming. [PERSONAL] was seen in the casino with an older female (LNU1) and a younger female (LNU2). Casino staff believed that LNU 1 might be [PERSONAL IN] wife and LNU 2 might be [PERSONAL IN] daughter.

[PERSONAL] was observed buying in for \$9,800 on Jan 21, \$ 9,800 on Jan 22 and \$7,000 on Jan 24. All of [PERSONAL IN] buy ins were mixed bills (\$100s, \$50s and \$20s).

On 2020-JAN-27, [PERSONAL] wins \$25K in chips at MDB05 and left the casino without cashing out.

SURVEILLANCE:

2020-JAN-20

23:45 hrs - [PERSONAL] receives chips from his \$3K (30x\$100) MDB08 table buy-in and continues to game.

2020-JAN-21

00:25 hrs - [PERSONAL] buys in for \$1.8K (36x\$50)

00:27 hrs - total buy-ins reach \$9.8K in mixed bills (\$100s and \$50s).

2020-Jan-22

12:10 hrs - 7K buy in (100x\$20, 60x\$50, 20x\$100) at MDB05.

12:30 hrs - Total buy-ins reach \$9.8K in mixed bills (\$100s, \$50s and \$20s).

15:33 hrs - LNU 2 makes several transactions at two ATM machinee with [PERSONAL] and LNU 1 nearby. All three individuals periodically view their cellphones during the transactions. After the transactions, LNU 2 passes all currency to [PERSONAL IN]

16:10 hrs - [PERSONAL] buys in for \$2.8K (28x\$100).

2020-JAN-24

00:17 hrs - [PERSONAL] buy-ins reach \$7K in mixed bills (\$100s, and \$50s).

2020-JAN-27

10:45 hrs - Arrived at Casino. Gamed until 15:45 hrs. [PERSONAL] won \$25K and left the casino. [PERSONAL] did not cash in his chips.

CONCLUSION/ACTIONS TAKEN

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

SP20200016715 Attached by glau on Jan 31, 2020 14:53

SP2020001671

5 - Continued-

The writer has reviewed the information provided by the casino and noted that PERSONAL has no previous iTRAK history. PERSONAL appears to be a new patron or possibly visiting the area with his family. PERSONAL was seen in the casino with an older female LNU 1 (Possibly Wife) and a younger female LNU 2 (Possibly Daughter). Casino Surveillance observed LNU 2 obtaining cash from ATM to give to PERSONAL for gaming purposes.

There was nothing unusual noted in PERSONAL IN gaming. PERSONAL risked appropriate amounts on each hand based on his gaming habits. There are no indications that the cash that PERSONAL came with is related to any criminal activities. Because PERSONAL has no history in BC casinos, it is impossible to link the cash that PERSONAL had to any illegal activities.

Due to no iTRAK history, there is no information to indicate that PERSONAL IN funds were likely sourced from the proceeds of crime or that his activity at The Riverrock Casino was anything other than an attempt at legitimate gambling.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest PERSONAL or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

SP20200018310 Attached by sbEEKSMA on Feb 3, 2020 06:31

Description: File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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Appendix 31

BCLC0016422.06

Appendix 32

iTrak incident report bearing the Incident File #IN20200006443 (BCLC0016423).

Incident File Full Report

Incident File #IN20200006443

Record Creation Details

Date/Time Occurred: 1/29/2020 6:23 PM
 Day of Week Occurred: Wednesday
 Date/Time Created: 1/29/2020 7:12 PM
 Date/Time Closed: 2/5/2020 9:28 AM
 Closed By: stolee

Department: Surveillance
 Owner: jjnorman
 Operator ID: jjnorman
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: RYBX 03

Details of Incident:

Daily Log #: DL20200087098
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: UFT - SID 123838 [YE, Ying Xin] B/I \$4k (200 x \$20's) on RYBX03. WS10.
 - C5077 at 17:46:40 drop off. (White lexus)

At 19:53hrs; B/I \$2K (20's) on RYB07. Total B/I: \$6K. WS10. (jjn)
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/29/2020 7:12 PM	jjnorman		

UFT - SID 123838 [PERSONAL INFORMATION] B/I \$4k (200 x \$20's) on RYBX03. WS10.
 - C5077 at 17:46:40 drop off. (White lexus)

Executive Brief:

Participants Involved:

Subject

Full Name: [PERSONAL INFORMATION] Company:
 Role: Info From

Police Contacted: Taken From Scene: Police Contacted Result :

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006443

Supplemental Entries:

SP20200015669 Attached by malianza on Jan 29, 2020 19:14

Description Surveillance was advised of a large buy-in using \$20 denominational bills.
 Patron: **PERSONAL IN** (SID 123838) - listed occupation "Owner Detail Business".
 No Incidents and No associates.
 International phone number and local address.

Although this amount is below FINTRAC-LCT reportable threshold and BCLC SOF requirements, there are some areas of this transaction that could be considered unusual.

1. It is unknown if YE's occupation deals primarily in small denominational bills but could be considered unusual.
2. Bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution, such as a bank, atm, or global cash&win.
3. It would be considered unusual and unlikely that a BC Casino would issue small denominational bills for large casino disbursements.
4. The bills were packaged in \$2K bundles - which has been an indicator that funds may be from questionable sources.
5. YE's occupation could be considered vague.

Footage shows the following with times approximate:

At 17:46 **PERSON** is dropped off on property just off River Rd by a white SUV (possibly Lexus). Lexus does not enter valet nor does it come into clear camera view (GC way/River Rd). **PERSON** is carrying an item as he enters resort doors and enters lobby washroom.

At 17:55 **PERSON** enters casino east entrance accessing his phone as he walks westbound on the gaming floor.

At 17:57 **PERSON** puts on a facemask (surgical mask), briefly enters washroom before beginning to write on a Baccarat tracking sheet at RYB01.

At 18:14 **PERSON** removes two bundles of his pockets at RYBX03 and places them on the table for buy-in. DLR removes the elastic bands and begins the count.

At 18:25 DLR completes the count for a total of \$4K (200x\$20). **PERSON** receives chips and walks around to various tables, marking numbers on the Baccarat tracking card. His gaming activity is limited, with bets ranging at ~\$20 wagers.

At 19:48 **PERSON** removes a bundle of \$20s from his jacket pocket and places it on RYB01 for table buy-in. DLR removes the elastic band and completes the count for a total of \$2K (100x\$20). **PERSON** receives 2x\$1K chips and places the chips in his pocket. **PERSON** continues to remain at RYB01.

At 21:40 **PERSON** accesses his phone and was last seen walking off site on No3 Rd.

Footage JAN20\UFT\20-06443

MLIANZA

30068

SP20200019222 Attached by stolee on Feb 4, 2020 12:26

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006443

SP20200019222 Attached by stoles on Feb 4, 2020 12:26

SP2020001922

2 - Continued-

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering.
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On Feb/05/2020 writer reviewed this incident, surveillance footage shows that on the date of Jan/29/2020 at 1747:48 hrs patron identified as **PERSONAL INFO** (SID#123838) arrived alone at the hotel lobby. **PER** appears to be on foot from Great Canadian Wa.

At 1814:33 hrs **PER** was seen buying in on RYBX3 for \$4,000 in \$20 bills and begins to play on various tables.

At 1947:54 hrs **PER** bought in for \$2,000 in \$20 bills on RYB7 and continues to play. (it is noted that patron was not approached as the buy-in amount is well under the SOF requirement.)

In this case **PER** was able to buy-in for total of \$6,000 in \$20 bills which is well under the \$10,000 threshold therefore **PER** was not approached for receipt.

A review of **PERSON** subject profile was done, **PER** has no previous incident on file, **PER** have been generating LCTR since Aug/2012.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest **PER** or the funds he used on this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200006443](#)

SP20200019222 Attached by stolee on Feb 4, 2020 12:26

SP2020001922

2 - Continued-

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE

BCLC Investigator

SP20200019725 Attached by sbEEKSMA on Feb 5, 2020 12:03

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045912 Attached by stolee on Jun 17, 2020 14:46

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

Appendix 33

iTrak incident report bearing the Incident File #IN20200006510 (BCLC0016424).

Incident File Full Report

Incident File #IN20200006510

Record Creation Details

Date/Time Occurred: 1/27/2020 9:47 PM
 Day of Week Occurred: Monday
 Date/Time Created: 1/30/2020 12:10 AM
 Date/Time Closed: 1/31/2020 2:48 PM
 Closed By: jklam

Department: Surveillance
 Owner: malianza
 Operator ID: malianza
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation:

Details of Incident:

Daily Log #: DL20200081681
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Closing Remarks: jl
 Synopsis: SID 16422 BI \$8k (7.5k 20's - \$500 50's) on MDB25 (profile updated as per TGM Leon)

@2213 16422 cash b/i \$1.9k (50s) on MDB25 total accum \$9.9k - John
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/30/2020 12:10 AM	malianza		
PERSONAL INFO SID 16422 BI \$9.9K (7.5K-20's - \$1.95K-50's) on MDB25 (profile updated as per TGM Leon)			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	PERSONAL INFORMATION	Company:	Huang Ming Agriculture Co.
Role:	Patron		

Supplemental Entries:

SP20200015808 Attached by malianza on Jan 30, 2020 00:12

Description During a review, surveillance noticed the following transaction on 2020-JAN-27 that could be considered unusual.

Patron: PERSONAL INFO (SID 16422) - listed occupation - "CEO-Huang Ming Agriculture Co."

Although PERSONAL INFO could have access to a level of wealth with funds coming from a recognized financial institution, PERSONAL INFO has been involved in six (6) incidents involving exchange of cash/chips and unusual activity, albeit dated in 2011.

The following could be considered unusual:

1. Bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution such a bank, atm, or global cash&win.
2. BC casinos do not issue large casino disbursements using small denominational bills.
3. PERSONAL INFO lack of BC-RRCR Casino disbursements make it unlikely that these funds originated from a recent casino disbursement.
4. The method in which the bills were packaged (bundles of \$20 + elastics) has been an indicator funds are from questionable sources.
5. Although PERSONAL INFO has not visited RRCR, it appears he was aware of BCLC SOF requirements as he removes two bills from his buy-in that would meet/reach FINTRAC-LCT reportable threshold and BCLC SOF requirements.

Footage shows the following with times approximate:

At 21:10 PERSONAL INFO arrives on site as a passenger in a Tesla (possible l/p HS798X), PERSONAL INFO and UNAM enter casino east entrance and take elevator to salon.

At 21:25 PERSONAL INFO places brick of \$50s and \$20s at MDB25 for table buy-in. PERSONAL INFO keeps 1xbundle of \$50s in his pocket.

DLR removes elastic bands and completes the count for a total of \$8K (370x\$20 and 12x\$50).

PERSONAL INFO receives chips and begins game play. UNAM does not participate in gaming activity.

At 22:07 PERSONAL INFO removes a bundle of \$50s from his pocket, removes 2x\$50 and places the bundle of \$50s for table buy-in at MDB25. DLR removes elastic bands and completes the count for a total of \$1.9K (38x\$50). PERSONAL INFO receives chips and begins game play.

Footage JAN20\UFT\20-06510

MLIANZA

30068

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

SP20200016711 Attached by jklam on Jan 31, 2020 14:46

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Amounts involved in line with or less than past buy in amounts
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

On 2020-JAN-27 at River Rock Casino, patron [PERSONAL INFORMATION] (SID 16422) conducted buy-in just under reporting threshold, totaling \$9,900 comprised entirely of \$20 and \$50 bills.

RESULTS OF FOOTAGE REVIEW (all times approximate):

2020-JAN-27 – 21:10 hours – patron [PERSONAL INFORMATION] (SID 16422) arrived to the site with an unidentified male associate, via blue Tesla vehicle at the valet, by the east entrance. The patrons proceeded to the Salon.

21:25 hours, table MDB25 – [PERSON] arrives to the table and presents a stack of mix \$20 bills and \$50 bills (bounded by elastic bands) for buy-in. The buy-in totaled \$8,000 (370x\$20 bills, 12x\$50 bills) and patron commenced game play upon receiving chips. His associate accompanied him at the table however did not participate.

22:07 hours, table MDB25 – [PERSON] conducted an additional buy-in of \$1,900 (38x\$50 bills). It was noted that patron kept \$100 (2x\$50 bills) from the bundle before presenting for buy-in. He continues to game play upon receiving chips.

22:15 hours, table MDB25 – Upon losing his bankroll, [PERSON] departed from the table with his associate. No further footage or documentation provided on his departure from the site.

CONCLUSION/ACTION TAKEN:

Based on the above information a STR will not be submitted to FinTRAC at this time.

[PERSON] is associated to sixteen (16) incidents in total, six (6) are unusual financial transactions (UFT), and 2 of which were assessed as substantiated (dated 2008-2009). [PERSON] has generated eighty-nine (89) large cash transactions (LCT) in BCLC facilities since 2006-JAN.

The investigator assesses that no unusual transaction took place as presented in this incident. Given the overall review of the patron's gaming session, the patron was gaming legitimately with no irregularities found. Although patron bought in with large quantities of \$20 bills (a portion being

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

SP20200016711 Attached by jklam on Jan 31, 2020 14:46

SP2020001671

1 - Continued-

\$50 bills), footage and incident details indicated patron arrived with the cash with the intention to use for his own gaming. Total buy-in was valued below the reporting threshold hence no receipts were asked. Patron had no cash outs as he lost his entire bankroll by end of gaming session. Review of subject profile and previous incidents involving **PERSC** does not raise any AML concerns that can further this incident. No other suspicious indicators were identified at this time.

Jenny Lam

BCLC AML Investigations

SP20200018311 Attached by sbEEKSMA on Feb 3, 2020 06:32

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045202 Attached by jklam on May 28, 2020 15:14

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

J.LAM

Investigator, BCLC AML Programs

Reporting Party:

Supervisor:

Appendix 34

iTrak incident report bearing the Incident File #IN20200007634 (BCLC0016425).

Incident File Full Report

[Incident File #IN20200007634](#)

Date/Time Occurred: [REDACTED] 12:23 PM

Day of Week Occurred: [REDACTED - RCMP]

Date/Time Created: [REDACTED] 12:29 PM

Date/Time Closed:

Closed By:

Record Creation Details

Department: Gaming Operations

Owner: cng

Operator ID: mkovacevic

Operator Name:

Personnel ID:

Card Number:

Job Position

Secondary Operator: cng

Location of Incident:

Property: Parq Casino

Location: Casino level 3

Sublocation: MRYB 812

Details of Incident:

Daily Log #: DL20200102354

Reference: ws#5

Type: Gaming

Specific: Unusual Financial Transaction

Category: [REDACTED - FINTRAC]

Incident Status: Closed

Synopsis: [REDACTED - RCMP] bought in for \$9,900 all in \$20's

Checklist: - Section 86 Form

[REDACTED - FINTRAC]

Narrative:

Created On

Created By

Modified On

Modified By

[REDACTED - RCMP] 12:30 PM

mkovacevic

[REDACTED - RCMP] bought in for \$9,900 all in \$20's

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200007634

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
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Role:	Documenter	Department:	BCLC
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Full Name:	KOVACEVIC, Menchie	Property:	Parq Casino
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Role:	Documenter	Department:	Surveillance
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Full Name:	NG, Charles	Property:	Parq Casino
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Role:	Info From	Department:	Tables
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Police Contacted:	Taken From Scene:	Police Contacted Result :
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Full Name:	LEI, Yvonne (Yifang)	Property:	Parq Casino
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Role:	Notified	Department:	Surveillance
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Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
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Role:	Patron
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Supplemental Entries:

SP20200018587 Attached by mkovacevic on Redacted - RCMP 2:47

Description On gaming date Redacted - RCMP at approximately 12:23hrs, surveillance observed a buy ins on the table all in \$20's at MRYB812 for \$9,900. Shortly, surveillance received a call from Pit Manager Charles NG the identity of the patron. Surveillance followed the patron's activity in Jade EAST, he played 3 times with \$100 bet and coloured up \$10,000. He exited the salon and stayed briefly at Poker area and then he left via Douglas podium using elevator 6906 and exited at P3.

Redacted - RCMP bought in for \$9,900 all in \$20's.

Surveillance saved and review the time he arrived/left in the casino:

113948 arrived at P3 alone with his Redacted - RCMP

114938 went straight to Level3 but goes to Jade WEST / had smoke at smoking patio/ talked with the casino host and eventually

goes to Jade EAST.

120959 at the table MRYB812 Redacted - RCMP pulled bundles of \$20's from both side pockets of his black jackets, removed the 5x\$20 for \$100 just to record of not over \$10K LCT status.

122244 he received \$9,900 (9x\$1000/ 9x\$100)

123357- he coloured up \$10,000- (2X\$5000) and left the room, (did not cash out) stayed in poker area very briefly.

124203- he left the premises on the same car with chips on him.

All necessary footage was saved in the UFT folder.

Section #86 was filed to GPEB.

MKovacevic- 93733 (ws#5)

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200007634](#)

SP20200018767 Attached by msdtehrani on [Redacted - RCMP] 18:15

Description Related footage is transferred to BCLC share drive AML Folder.
Massoud TEHRANI.

SP20200018816 Attached by cng on [Redacted - RCMP] 19:54

Description On gaming date [Redacted - RCMP] at approximately 12:25, I informed Surveillance that [Redacted - RCMP]
[Redacted - RCMP] bought in \$9,900 in all 20's on table MRYB812.

Charles NG
73169

SP20200019353 Attached by jklam on [Redacted - RCMP] 15:52

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:39 PM

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Appendix 34

Incident File Full Report

[Incident File #IN20200007634](#)SP20200019353 Attached by jklam on Redacted - RCMP 5:52

SP2020001935

3 - Continued-



Redacted - FINTRAC

B.C. Lottery Corporation file number(s) 2020-07634 refers.

Jenny LAM

BCLC – AML Investigations

SP20200019651 Attached by sbeeksma on Redacted - RCMP 08:03

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:39 PM

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Appendix 34

Incident File Full Report

[Incident File #IN20200007634](#)SP20200019651 Attached by sbeeksma on Redacted -
RCMP 08:03

SP2020001965

1 - Continued-

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:39 PM

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Appendix 34

Incident File Full Report

[Incident File #IN20200007634](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 35

iTrak incident report bearing the Incident File #IN20200008074 (BCLC0016426).

Incident File Full Report

[Incident File #IN20200008074](#)

Incident File Full Report		Record Creation Details	
Date/Time Occurred:	Redacted - RCMP 1:25 AM	Department:	Surveillance
Day of Week Occurred:	Redacted - RCMP	Owner:	anscott
Date/Time Created:	Redacted - RCMP 1:32 AM	Operator ID:	anscott
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: Parq Casino
Location: BOH Level 3
Sublocation: CD14

Details of Incident:

Daily Log #: DL20200108027
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Synopsis: Redacted - RCMP bought in \$9,900 in \$20s at CD12.
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
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Redacted - RCMP	11:33 AM	anscott	
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Redacted - RCMP bought in \$9,900 in \$20s at CD12.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008074

Participants Involved:

Personnel

Full Name: POLIAKOV, Vladimir Property: Parq Casino

Role: Documenter Department: Surveillance

Full Name: SCOTT, Analyn Property: Parq Casino

Role: Documenter Department: Surveillance

Full Name: SAMARDZIC, Jela Property: Parq Casino

Role: Info From Department: Cage

Police Contacted: Taken From Scene: Police Contacted Result :

Full Name: VUONG, Stephanie (Linh Hue) Property: Parq Casino

Role: Info From Department: Tables

Police Contacted: Taken From Scene: Police Contacted Result :

Full Name: LEI, Yvonne (Yifang) Property: Parq Casino

Role: Notified Department: Surveillance

Subject

Full Name: Redacted - RCMP Company: Redacted - RCMP

Role: Patron

Supplemental Entries:

SP20200019714 Attached by anscott on Redacted - RCMP 11:34

Description On Redacted - RCMP at approximately 1125hrs, Cage Supervisor Jela SAMARDZIC and Floor Manager Stephanie VUONG reported of a \$9,900 buy in all in \$20s at CD14, and was permitted to buy and play at MDB302. Chips were received at 1136hrs at the same table.

A review pending....

WS4
ASCOTT
86103

SP20200019764 Attached by vpoliakov on Redacted - RCMP 3:29

Description On the date of Redacted - RCMP Surveillance conducted a tape review of Redacted - RCMP activity in the casino regarding a large cash buy-in in bills of small denomination (495x\$20 for \$9,900).

It was found that Redacted - RCMP arrived to the casino at approximately 11:15 driving a Redacted - RCMP which he parked in Parking P2, Stall #478 Redacted - RCMP took Douglass Elevator #11 to L3 gaming floor and moved to the Jade West, Salon#2. At 11:18 Redacted - RCMP retrieved two bundles of 20 bills from a

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200008074](#)

SP20200019764 Attached by vpoliakov on [Redacted - RCMP] 13:29

SP2020001976

4 - Continued-

pocket of his jacket and delivered them to the Cage, CD14. The bills we processed at CD13; CPV to MDB302 was issued for the full amount of \$9,900. At 11:36 [Redacted d -] received this for \$9,900 at MDB302. As well at 11:32 [Redacted d -] coloured down at MDB302 2x\$5,000 chips, which he retrieved from his pocket.

[Redacted - RCMP] was observed playing at MDB302 a slow game with minimum play, average bets for \$500.

At approximately 12:57 [Redacted d -] left MDB302 and delivered his chips for \$12,910 to the Cage for cash out. A verified win cheque #13783 was created for \$3,000; \$9,900 of the initial buy-in was returned to [Redacted - RCMP] in \$20 bills. At approximately 13:50 [Redacted d -] repeated his buy-in for \$9,900 at MDB302. He collected his chips and immediately left MDB302 and Jade West in company of an unknown Asian male associate.

Pertinent footage has been saved to 'UTF' folder
A Section 86 Form sent to GPEB

V.POLIAKOV, #52488

SP20200019829 Attached by ylel on [Redacted - RCMP] 15:20

Description Footage transferred to BCLC shared drive.

Y Lei #34141

SP20200020316 Attached by jklam on [Redacted - RCMP] 12:04

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

SP20200020316 Attached by jklam on Redacted - RCMP 12:04

SP2020002031

6 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

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Appendix 35

BCLC0016426.04

SP20200020316 Attached by jklam on Redacted - RCMP 12:04

SP2020002031

6 - Continued-

Redacted
- FINTRAC

B.C. Lottery Corporation file number(s) 2020-08074 refers.

Jenny LAM

BCLC – AML Investigations

SP20200020360 Attached by sbEEKSMA on Redacted - RCMP 13:21

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 36

iTrak incident report bearing the Incident File #IN20200008140 (BCLC0016427).

Incident File Full Report

[Incident File #IN20200008140](#)

Date/Time Occurred: [Redacted] 16 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted] 00 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Surveillance
Owner: anscott
Operator ID: anscott
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Parq Casino
Location: Casino level 3
Sublocation: MDB 815

Details of Incident:

Daily Log #: DL20200108548
Type: Gaming
Specific: Unusual Financial Transaction

Category: [Redacted - FINTRAC]

Incident Status: Closed

Synopsis: [Redacted - RCMP] bought in for \$9,000 all in \$20s (450x\$20) on MDB815.

Checklist:

[Redacted - FINTRAC]

Narrative:

Created On	Created By	Modified On	Modified By
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[Redacted - RCMP]	3:00 PM	anscott	
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[Redacted - RCMP] bought in for \$9,000 all in \$20s (450x\$20) on MDB815.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008140

Participants Involved:

Personnel

Full Name:	SCOTT, Analyn	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	NGUYEN, Thi Loan	Property:	Parq Casino
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	LEI, Yvonne (Yifang)	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
Redacted - RCMP	Watch	Redacted - RCMP	Permanent
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			

Supplemental Entries:

SP20200019894 Attached by anscott on Redacted - RCMP 15:02

Description On Redacted - RCMP at approximately 1416hrs, Pit Manager Thi Loan NGUYEN reported a buy in of \$9,000 all in \$20s (450x\$20) from patron Redacted - RCMP at MDB815.

Review shows the following events:

At 1333hrs Redacted - RCMP arrived in front of the casino driving Redacted - RCMP dropped off his car and headed to L3 gaming floor at Jade East taking escalator.

At 1406hrs Redacted - RCMP entered the washroom with Redacted - RCMP and went separate ways.

At 1409hrs Redacted - RCMP bought in \$9,000 all in \$20s at MDB815. Received his chips and walked out with Redacted - RCMP and went to the washroom by Lotus Lounge together at 1429hrs and got out together 1431hrs.

At 1431hrs Redacted - RCMP with Redacted - RCMP at the poker desk then later Redacted - RCMP went back at Jade East Salon.

At 1436hrs, MDB815, Redacted - RCMP just sat at the table, no play and left salon and went back at the

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200008140](#)

SP20200019894 Attached by anscott on [Redacted - RCMP] 15:02

SP2020001989

4 - Continued-

poker desk.

At 1441-1447hrs, MDB813 [Redacted - RCMP] played with \$300-\$500 bet for just a few minutes.

At 1451-1459hrs, MDB815 [Redacted - RCMP] played for a few minutes with \$300 bet.

At 1459-15-08hrs, he was seen played at MDB813.

At 1527hrs [Redacted - RCMP] was seen heading out taking the escalator down to P1 where he waited for his car and driven off.

Section 86 sent to GPEB

Footage saved under UFT folder

WS1

ASCOTT

86103

SP20200020228 Attached by ylel on [Redacted - RCMP] 09:57

Description Footage has been transferred to BCLC shared drive.

Y Lei #34141

SP20200020919 Attached by jklam on [Redacted - RCMP] 14:38

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

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Appendix 36

Incident File Full Report

[Incident File #IN20200008140](#)SP20200020919 Attached by jklam on Redacted - RCMP 14:38

SP2020002091

9 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

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Appendix 36

Incident File Full Report

[Incident File #IN20200008140](#)SP20200020919 Attached by jklam on Redacted - RCMP 14:38

SP2020002091

9 - Continued-



B.C. Lottery Corporation file number(s) 2020-08140 refers.

Jenny LAM

BCLC – AML Investigations

SP20200022481 Attached by sbeeksma on Redacted - RCMP 07:01

Description

On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

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Appendix 36

Incident File Full Report

[Incident File #IN20200008140](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 37

iTrak incident report bearing the Incident File #IN20200009067 (BCLC0016429).

Incident File Full Report

[Incident File #IN20200009067](#)

Record Creation Details	
Date/Time Occurred:	2/9/2020 2:00 AM
Day of Week Occurred:	Sunday
Date/Time Created:	2/9/2020 12:12 PM
Date/Time Closed:	2/10/2020 2:53 PM
Closed By:	jklam
Department:	Surveillance
Owner:	malianza
Operator ID:	malianza
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	MRYB 20

Details of Incident:

Daily Log #:	DL20200120013
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Unsubstantiated
Incident Status:	Closed
Closing Remarks:	jl
Synopsis:	SID 225006 BI \$3K (50s), total \$8500 as per DS Eric LIU
Checklist:	- Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
2/9/2020 1:04 PM	malianza		
PERSONAL (SID 225006) & PERSONAL IN (SID 38859) B/I combined \$31K (620x\$50) outside 24hrs			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009067

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	LNU, RRCR20-09067	Company:	
Role:	Patron		
Full Name:	PERSONAL INFO	Company:	Northland Healful Center
Role:	Patron		
Full Name:	PERSONAL INFO	Company:	
Role:	Patron		

Supplemental Entries:

SP20200022059 Attached by malianza on Feb 9, 2020 13:06

Description Surveillance noted a buy-in involving two individuals with subject files who had previously not been associated in iTRAK* gaming together. Both individuals reside in PERSONAL INFO and conducted large buy-ins involving \$50 denominational bills for a combined total of \$31K that fell just outside the 24hr FINTRAC-LCT reportable threshold and BCLC SOF requirement.

*Patrons have since been associated in iTRAK for reference.

Patrons involved:

1. PERSONAL INFO (SID 225006).

Occupation listed on subject file - Housewife

Address - PERSONAL INFORMATION

Subject File last validated 2017.

2. PERSONAL INFO (SID 38859).

Occupation listed on subject file - Health Care Professional - Northland Healful Center.

Address - PERSONAL INFORMATION

Subject File last validated 2017.

3. UNAM

Footage shows the following with times approximate:

2020 FEB 07

At 23:17 PERSONAL INFO and UNAM exit a vehicle on River Rd and enter casino resort entrance. The vehicle enters west valet area (using taillights as reference point, it appears the vehicle is a Honda Pilot). Pilot continues to No3 Rd and a license plate could not be obtained.

At 23:31 PERSONAL INFO and UNAM enter salon.

At 23:40 PERSONAL INFO and UNAM sit at MYRB20 and begin to buy-in.

PERSONAL INFO places \$50s for table buy-in at MYRB20 DLR completes the count for a total of \$8K (160x\$50).

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009067

SP20200022059 Attached by malianza on Feb 9, 2020 13:06

SP2020002205

9 - Continued-

PERSONAL removes elastic bands and places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$5K (100x\$50).

UNAM places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$2K (40x\$50).

All three patrons receive chips and begin game play.

2020 FEB 08

At 08:44 PERSONAL removes elastic bands and places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$3K (60x\$50). PE receives chips and continues game play.

At 09:30 PE and PE go to salon washroom.

At 09:36 PERSONAL places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$500 (10x\$50). PE receives chips. PERSONAL places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$1.5K (30x\$50). PE receives chips and continues game play.

At 12:45 PERSONAL leaves site in taxi - GC 75 with PERSONAL IN and UNAM going to hotel room-WT9.

At 16:31 PERSONAL returns to site in a taxi - North Shore N107. PERSONAL meets PERSONAL at resort lobby and both go to WT9.

At 23:14 PERSONAL and UNAM enter salon and walk to MYRB20. PERSONAL looks at her phone and shows UNAM. PERSONAL and UNAM collect their belongings and go to salon lounge and order food.

2020 FEB 09

At 00:27 PERSONAL places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$8K (160x\$50). PE receives chips. PERSONAL places \$50s for table buy-in at MYRB20. DLR completes the count for a total of \$2K (40x\$50). PE receives chips. UNAM places \$100s for table buy-in at MYRB20. DLR completes the count for a total of \$2K (20x\$100). UNAM receives chips and all three patrons begin to game.

At 01:53 PERSONAL counts a bundle of \$50s under MYRB20 before placing some for table buy-in. PE wraps remaining \$50s in an elastic band and places in a green drawstring bag. DLR completes the count for a total of \$3K (60x\$50). PE receives chips and continues to game.

At 03:58 PERSONAL, UNAM and an UNAF go to WT9.

At 04:14 all four individuals leave WT9 and enter-exit casino and go to P2 west parkade.

PERSONAL, UNAM driven off site in a Toyota Camry.

*Review shows UNAF drives Camry on site west parkade on 2020Feb08. Camry has BC license plate FF181H. UNAF enters casino west entrance, meets PERSONAL INFORM (SID 140337) and enters Dogwood Baccarat Room.

PERSONAL - buy-in total - \$13.5K (270x\$50).

PERSONAL IN - buy-in total - \$17.5K (350x\$50).

UNAM - buy-in total - \$4K (20x\$100 and 40x\$50).

Although the patrons appear to be gaming legitimately, there are some areas of this transaction that could be considered unusual.

1. The buy-ins fall just outside a 24hr reporting period as required by FINTRAC-LCT threshold and BCLC SOF reporting requirements. 3.1.31 Client attempts to avoid being identified under the FINTRAC large cash transaction policy. 3.1.24 Client appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds 3.1.25 Client appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds. 3.1.9

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009067

SP20200022059 Attached by malianza on Feb 9, 2020 13:06

SP2020002205

9 - Continued-

Client performs two or more cash transactions of less than \$10,000 each just outside of 24 hours apart, seemingly to avoid the 24-hour rule.

2. The three individuals were dropped off and conducted the buy-ins outside of usual banking hours. 3.1.11 Client has access to large amounts of cash after banking hours on short notice

3. Some of the \$50 denominational bills used were packaged that is not consisted with banking practices, ie., bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution (atm,bank,global cash&win).

4. Although [PERSONAL INFO] and UNAM could participate in gaming activity at other BC Casinos [PERSONAL INFO] is only individual known to game at other LMD casinos), coupled with their apparent inactivity, it would be considered unusual for a BC Casino to issue large casino disbursements using \$50 denominational bills.

5. It is unknown if [PERSONAL INFO] occupation as housewife and [PERSONAL INFO] occupation as health care professional deal primarily in \$50 denominational bills but it could be considered unusual and unlikely. 3.1.16 Client's occupation does not match the level or type of play with no known explanation for the difference.

Images attached to media.

Footage FEB20\UFT\20-09067

MLIANZA

30068

SP20200022770 Attached by jklam on Feb 10, 2020 14:53

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc. where applicable
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No direct involvement in substantiated UFT incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

Between 2020-FEB-07 and 2020-FEB-09 at River Rock Casino, patrons [PERSONAL INFO] (SID 225006)

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009067

SP20200022770 Attached by jklam on Feb 10, 2020 14:53

SP2020002277

0 - Continued-

and **PERSONAL INFO** (SID 38859) cumulatively conducted buy-ins totaling \$31,000, comprised entirely of \$50 bill denominations.

RESULTS OF FOOTAGE REVIEW (all times approximate):

2020-FEB-07 – 23:17 hours - patrons **PERSONAL INFO** (SID 225006) and **PERSONAL INFO** (SID 38859), along with unidentified Asian male LNU, RRCR20-09067 (SID 288599), were dropped off by a Honda vehicle, and the patrons proceeded into the site via resort entrance, towards The Salon.

23:40 hours, table MYRB20 – **PERSONAL INFO** conducted buy-in of \$8,000 (160x\$50 bills), **PERSONAL INFO** conducted buy-in of \$5,000 (100x\$50 bills), and RRCR20-09067 conducted \$2,000 (40x\$50 bills), respectively. The patrons received their chips and commenced game play.

2020-FEB-08 – 08:44 hours, table MYRB20 – **PERSONAL INFO** conducted a second buy-in of \$3,000 (60x\$50 bills), received her chips and continued to play.

09:30 hours, table MYRB20 – **PERSONAL INFO** conducted a third buy-in of \$500 (10x\$50 bills), followed by a buy-in by **PERSONAL INFO** totaling \$1,500 (30x\$50 bills). The patrons received their chips accordingly and continued to game play.

12:45 hours – **PERSONAL INFO** departed from the site via taxi. **PERSONAL INFO** and RRCR20-09067 went to their hotel room WT9. At 16:31 hours, **PERSONAL INFO** was seen back at resort lobby and meets up with **PERSONAL INFO**. The two proceeded to hotel room WT9.

23:14 hours – **PERSONAL INFORMATION**, and RRCR20-09067 were seen eating at the salon lounge.

2020-FEB-09 – 00:27 hours, table MYRB20 – the patrons arrived back to the table, **PERSONAL INFO** conducted buy-in of \$8,000 (160x\$50 bills), **PERSONAL INFO** conducted buy-in of \$2,000 (40x\$50 bills), and RRCR20-09067 conducted \$2,000 (20x\$100 bills), respectively. The patrons received their chips and commenced game play.

01:53 hours, table MYRB20 – **PERSONAL INFO** conducted an additional buy-in of \$3,000 (60x\$50 bills), received chips and continued to game play.

03:58 hours – **PERSONAL INFORMATION** RRCR20-09067, and unidentified female associates goes back to resort hotel WT9, until 04:14 hours, all patrons departed from site via Toyota Camry (BCLP FF181H) from P2 west parkade.

CONCLUSION/ACTION TAKEN:

Based on the above information a STR will not be submitted to FinTRAC at this time.

PERSONAL INFO is associated to thirty-four (34) incidents in total, this is the first unusual financial transactions (UFT) involving **PERSONAL INFO** has generated thirty-two (32) large cash transactions (LCT) in BCLC facilities since 2015-APR. This is the first unusual financial transaction (UFT) and incident involving **PERSONAL INFO** and RRCR20-09067.

The investigator assesses that no unusual transaction took place as presented in this incident. All patrons arrived together with cash in possession and were gaming together. **PERSONAL INFO** and **PERSONAL INFO** cumulatively conducted buy-ins totaling \$31,000 (all \$50 bills), while RRCR20-09067 conducted 2 buy-ins totaling \$4,000 with mixed denominations of \$50 and \$100 bills. **PERSONAL INFO** and RRCR20-09067 appear to be a couple and is staying at the resort hotel on site. It should be noted that no point was site made aware of the buy-ins or approached for source of funds. Buy-ins were gradually conducted to further patrons' gaming, and all bankroll was played during their gaming sessions. The denomination of bills can be reasonably retrieved from ATM via bank

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009067

SP20200022770 Attached by jklam on Feb 10, 2020 14:53

SP2020002277

0 - Continued-

account withdrawal. There are no irregularities in patrons' game plays and was gaming legitimately. Review of subject profile and previous incidents involving [REDACTED] does not raise any AML concerns that can further this incident. No other suspicious indicators were identified at this time.

Jenny Lam

BCLC AML Investigations

SP20200023096 Attached by sbeksma on Feb 11, 2020 06:43

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045179 Attached by jklam on May 28, 2020 11:27

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

J.LAM

Investigator, BCLC AML Programs

Reporting Party:

Supervisor:

Appendix 38

iTrak incident report bearing the Incident File #IN202010193 (BCLC0016430).

Incident File Full Report

[Incident File #IN20200010193](#)

Date/Time Occurred: [Redacted] 4:42 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted] 4:43 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Surveillance
Owner: asekhon
Operator ID: asekhon
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Starlight Casino (GC)
Location: Casino Floor-Starlight Casino
Sublocation: MDB 10

Details of Incident:

Daily Log #: DL20200137021
Related Incidents: IN20200011366
Type: Gaming
Specific: Unusual Financial Transaction
Category: [Redacted - FINTRAC]
Incident Status: Closed
Synopsis: [Redacted - RCMP] Bought in for \$9820 all in \$20 bills
Checklist: - Section 86 Form

[Redacted - FINTRAC]

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 4:43 PM	asekhon	[Redacted - RCMP] 4:48 PM	asekhon
[Redacted - RCMP] Bought in for \$9820 all in \$20 bills			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010193

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC
Full Name:	PINEDA, Alfonso Esteban	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Cage
Full Name:	SEKHON, Avsimran	Property:	Starlight Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Supplemental Entries:

SP20200024966 Attached by asekhon on Redacted - RCMP 17:24

Description

On Redacted - RCMP at approximately 16:35 hrs Surveillance received a call from Cage Supervisor Alfonso PINEDA of a Large buy in of \$9,820 all in \$20 bills from patron Redacted - RCMP

Redacted - RCMP Surveillance observed the following.

16:16:08hrs Redacted - RCMP arrives on site in a Redacted - RCMP and parks in the RED zone of the underground parking lot. After parking Redacted - RCMP heads toward the main entrance.

16:18:44hrs Redacted - RCMP enters the Casino and goes up the escalator towards the Casino lobby.

16:19:31hrs Redacted - RCMP enter the Casino gaming floor and walks to wards the VIP room.

16:19:55hrs Redacted - RCMP enter the VIP room and walks towards the Casino cash cage.

16:21:56hrs Redacted - RCMP arrives at the VIP cash cage (CD11) and places a bundle of \$20 bills on the cash desk.

16:30:52hrs The bundle is counted in the Jet. Surveillance was informed by the Cage that the total buy-in for \$9,820. The breakdown as follow:

491 x \$20= \$9,820.00

16:45:42hrs Redacted - RCMP receives he's \$9,820 buy-in in chips at MDB10. The breakdown as follow:

19 x \$500= \$9,500.00

3 x \$100= \$300.00

4 x \$5= \$20

\$9,820.00

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010193

SP20200024966 Attached by asekho on [Redacted - RCMP] 17:24

SP2020002496

6 - Continued-

[Redacted - RCMP] bought in for a total of \$9,920.00 and began his play at MDB10.

21:24:48hrs [Redacted - RCMP] chips out at MDB10. The breakdown as follows:

50x \$500= \$25,000

5x \$100= \$500

4x \$25= \$100

\$25,600

[Redacted - RCMP] receives \$25,600 in chips from MDB10. Break down as follows:

5x \$5000= \$25,000

1x \$500= \$500

1x \$100= \$100

\$25,600

21:27:23hrs [Redacted - RCMP] arrives at the VIP cash cage and places chips at the cash desk to cash out.
Breakdown as follow:

3x \$5000= \$15,000

1x \$500= \$500

1x \$100= \$100

1x \$25= \$25

\$15,625

21:31:31hrs [Redacted - RCMP] receives \$15,625 from the VIP cash cage. Break down as follow:

156x \$100= \$15,600

2x \$20= \$20

1x \$5= \$5

\$15,625

After receiving the cash [Redacted - RCMP] exits the VIP room.

21:32:22 [Redacted - RCMP] exits the gaming floor, and proceeds to the underground parking red zone, then enters the same vehicle he arrives in and drives off site.

END OF REPORT

Section 86 form sent

Footage saved in Y:\Suspicious Financial Transaction

[Redacted - RCMP]

0193 02-14-20

[Redacted - RCMP]

[Redacted - RCMP] \$9,820

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200010193](#)SP20200024966 Attached by asekhon on Redacted - RCMP 17:24

SP2020002496

6 - Continued-

Avsimran SEKHON

GPEB 89186

SP20200027686 Attached by glau on Redacted - RCMP 12:53

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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Appendix 38

Incident File Full Report

[Incident File #IN20200010193](#)

SP20200027686 Attached by glau on

Redacted -
RCMP

12:53

SP2020002768

6 - Continued-



Redacted
- FINTRAC


Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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Appendix 38

Incident File Full Report

[Incident File #IN20200010193](#)SP20200027686 Attached by glau on  12:53

SP2020002768

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

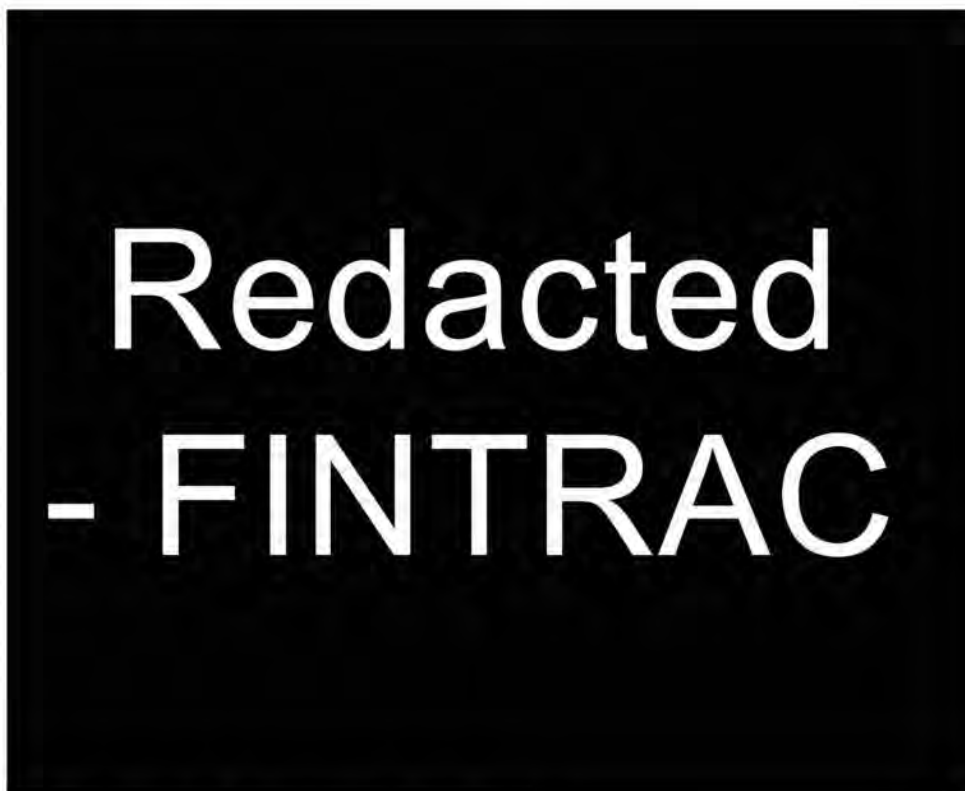
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Appendix 38

Incident File Full Report

[Incident File #IN20200010193](#)SP20200027686 Attached by glau on **Redacted - RCMP** 12:53

SP2020002768

6 - Continued-



B.C. Lottery Corporation file number(s) 2020-10193 refers.

Gerald Lau

BCLC – AML Investigations

SP20200028156 Attached by sbeeksma on **Redacted - RCMP** 06:45

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

SP20200030824 Attached by jaddison on **Redacted - RCMP** 12:12

Description

Redacted - RCMP

- Surveillance uploaded this file for GPEB to the FTP server this date.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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Appendix 38

Incident File Full Report

[Incident File #IN20200010193](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 39

iTrak incident report bearing the Incident File #IN20200010661 (BCLC0016431).

Incident File Full Report

[Incident File #IN20200010661](#)

Date/Time Occurred: [Redacted] 4:40 AM
Day of Week Occurred: [Redacted] - RCMP
Date/Time Created: [Redacted] 5:47 AM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Surveillance
Owner: Idawatis
Operator ID: Idawatis
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Parq Casino
Location: Casino level 3
Sublocation: MRYB 309

Details of Incident:

Daily Log #: DL20200142298
Reference: WS2
Type: Gaming
Specific: Unusual Financial Transaction
Category: [Redacted - FINTRAC]
Incident Status: Closed
Synopsis: Unknown, Asian, Male has accumulated \$8,120 in cash buys in all in \$20 bills.
Checklist: - Section 86 Form

[Redacted - FINTRAC]

Narrative:

Created On	Created By	Modified On	Modified By
------------	------------	-------------	-------------

[Redacted - RCMP] 5:47 AM	Idawatis		
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Unknown, Asian, Male has accumulated \$8,120 in cash buys in all in \$20 bills.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010661

Participants Involved:

Personnel

Full Name:	DAWATIS, Louie	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	NG, Charles	Property:	Parq Casino
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	ZUNIGA, Alberto	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
Redacted - RCMP	Watch	Redacted - RCMP	Permanent
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			

Supplemental Entries:

SP20200025955 Attached by ldawatis on Redacted - RCMP 05:51

Description On Redacted - RCMP at approximately 04:40 hrs, Pit Manager NG, Charles informed Surveillance that a Patron now being referred to as, Redacted - RCMP has accumulated \$8,120 (\$20x406) in cash buy ins. According to NG, the Patron was allowed to buy and will be returned all his \$20s bills upon cash out. His play was briefly watched and he was wagering on average \$300.

A tape review of his activities found the following:

03:14 hrs - Patron arrived on site on foot via the JW Marriot Entrance Doors by himself.

03:17 hrs - Patron conducts a \$3,120 cash buy in all in \$20s at MDB312.

03:57 hrs - Patron conducts a \$5,000 cash buy in all in \$20s at MDB312.

Patron is still as of 06:59 hrs.

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200010661](#)

SP20200025955 Attached by Idawatis on [Redacted - RCMP] 05:51

SP2020002595

5 - Continued-

Station #2.

A section 86 report has been sent to GPEB.

Available footage saved in "UFT" folder under the incident number.

Surveillance Operator

DAWATIS, Louie

GPEB#76441

SP20200026345 Attached by azuniga on [Redacted - RCMP] 00:53

Description

Subject stopped playing at 0942hrs cashing out \$4,065 at Cd13 and left off site at 0948hrs on foot via the JW Marriott Entrance Doors by himself.

AZUNIGA

85044

SP20200027077 Attached by ylel on [Redacted - RCMP] 11:33

Description

Footage has been transferred to BCLC shared drive.

Y Lei #34141

SP20200028838 Attached by jklam on [Redacted - RCMP] 11:25

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200010661](#)SP20200028838 Attached by jklam on Redacted -
RCMP 11:25

SP2020002883

8 - Continued-



B.C. Lottery Corporation file number(s) 2020-10661 refers.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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Incident File Full Report

[Incident File #IN20200010661](#)

SP20200028838 Attached by jklam on [Redacted - RCMP] 11:25

SP2020002883

8 - Continued-

Jenny LAM

BCLC – AML Investigations

SP20200028852 Attached by sbeeksma on [Redacted - RCMP] 12:16

Description

On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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Appendix 39

Incident File Full Report

[Incident File #IN20200010661](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 40

iTrak incident report bearing the Incident File #IN202011085 (BCLC0016432).

Incident File Full Report

[Incident File #IN20200011085](#)

Date/Time Occurred: [Redacted] 9:47 AM
Day of Week Occurred: [Redacted] - RCMP
Date/Time Created: [Redacted] 10:19 AM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Gaming Operations
Owner: alaw
Operator ID: gcanonizado
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: MDB 24

Details of Incident:

Daily Log #: DL20200148699
Related Incidents: IN20200012989
Type: Gaming
Specific: Unusual Financial Transaction
Category: [Redacted - FINTRAC]
Incident Status: Closed
Synopsis: [Redacted - RCMP] B/I of \$9.9K (all \$50s) on table MDB24, DS Leslie
please x-ref - [Redacted - RCMP]
Checklist: - Section 86 Form

[Redacted - FINTRAC]

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 10:19 AM	gcanonizado		
[Redacted - RCMP]	B/I of \$9.9K (all \$50s) on table MDB24		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200011085

Participants Involved:

Personnel

Full Name:	CHOW, Oscar	Property:	River Rock (GCC)
Role:	Documenter	Department:	Tables
Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Redacted - RCMP		
Full Name:	Redacted - RCMP	Company:	
Role:	Redacted - RCMP		

Supplemental Entries:

SP20200027061 Attached by malianza on Redacted - RCMP 10:28

Description

Surveillance was advised of a large buy-in involving \$50 denominational bills for Redacted - RCMP

Redacted - RCMP Although the individual transactions fall below BCLC SOF requirements and

FINTRAC-LCT reportable thresholds, it is suspected they are from the same source and Redacted - RCMP

transaction is on behalf of Redacted - RCMP and will be included in this report.

Patrons involved:

Redacted - RCMP

Listed occupation - "Owner Trading Business of Raw Materials - Redacted - RCMP"

Address: Redacted - RCMP

Redacted - RCMP

Listed occupation - "housewife"

Address: Redacted - RCMP

Redacted - RCMP and Redacted - RCMP have been involved in four UFTs involving falling below FINTRAC-LCT reportable and BCLC SOF required thresholds.

Areas of this transaction that could be considered unusual:

1. Redacted - RCMP occupation does not readily provide a source of wealth or access of funds.
2. Both buy-ins involve \$50 denominational bills bound with elastic bands that is not within usual banking practices and can be considered unusual for financial institutions such as bank, ATMs, and global cash&win to issue a large amount of \$50 denominational bills bound with elastic bands.
3. Although Redacted - RCMP and Redacted - RCMP relationship has since been stated as husband/wife, they do not reside at or have the same listed address on their subject file.
4. Although Redacted - RCMP and Redacted - RCMP have BC Casino disbursements, it would be considered unusual for a BC Casino to issue large casino disbursements using \$50 denominational bills.
5. Redacted - RCMP has a BCLC HRPP-Prohibited patron as an associate.

Following indicators could be referenced:

- 3.1.4 Client has known associates who are deemed suspicious by the gaming facilities

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200011085

SP20200027061 Attached by malianza on [Redacted - RCMP] 10:28

SP2020002706

1 - Continued-

- 3.1.20 Client makes inquiries that would indicate a desire to avoid reporting
- 3.1.24 Client appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds
- 3.1.25 Client appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds
- 3.1.31 Client attempts to avoid being identified under the FINTRAC large cash transaction policy.

Footage shows the following with times approximate:

At 09:30 [Redacted] and [Redacted] arrive on site in a [Redacted - RCMP] and [Redacted] enters salon. [Redacted] removes 2 x \$50 denominational bills from the bound bundle and placed the bundle of \$50 bills at MDB24 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). [Redacted] receives chips and begins to game.

At 10:30 [Redacted] removes bundle of \$50s from her purse and removes elastic bands and places the bundle of \$50s for table buy-in at MDB01. [Redacted] counts a second stack of \$50s and places some on MDB01 to be included in the buy-in. [Redacted] returns some \$50 denominational bills to her purse.

TGM CHOW was advised of [Redacted] and [Redacted] actions, previous history of UFT-SOF incidents and large amount of \$50 denominational bills. CHOW speaks with [Redacted] and later speaks with [Redacted]. CHOW advised surveillance both patrons were advised they would be issued \$50 denominational bills for any RRCR casino disbursement from this gaming session.

At 10:37 DLR completes the count for a total of \$9K (180x\$50). [Redacted] takes the chips and meets [Redacted] outside salon at 10:40 and the actions of [Redacted] and [Redacted] are consistent with the transfer of an item, in this case, chips.

At 10:44 [Redacted] sits at RYB06 and has chips in his possession and continues to game. TGM CHOW was advised.

Combined buy-in for [Redacted] and [Redacted] is \$18.9K (378x\$50).

TGM CHOW provided the following information from the conversation with [Redacted] and [Redacted].

- Bills were from their house for over 6months.

[Redacted] and [Redacted] are husband and wife.

-Deny any cash or chip passing.

Footage [Redacted] UFT20-11085

MLIANZA

30068

SP20200027089 Attached by ochow on [Redacted - RCMP] 12:12

Description On the gaming date [Redacted - RCMP] @ 10:30am, surveillance informed the TGM CHOW, Oscar that [Redacted - RCMP] produced \$9000 cash B/I (\$50s) on MDB01 & [Redacted - RCMP] produced \$9000 cash B/I (\$50s) on MDB24. Even though these 2 transactions had not reached \$10K threshold but surveillance wanted to know if these bills could be sourced or not.

TGM first approached [Redacted] and she stated the bills were from previous bank withdrawal and had those bills over 6 months in her house. [Redacted] was told the casino will return all 50s to her first if she

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200011085

SP20200027089 Attached by ochow on Redacted - RCMP 12:12

SP2020002708

9 - Continued-

cashes out later.

R eda was approached later on RYB06 by TGM an R eda also stated \$50s bill were from his bank withdrawal and had them at home for over 6 months. Also surveillance suspect a possible chip pass between Redacted - RCMP outside of Salon, when being asked by TGM R e denied any chip or cash pass involved between them, also R e mentioned that Reda cted is his wife.

Table Gaming Manager

Oscar CHOW

GPEB22542

SP20200031890 Attached by glau on Redacted - RCMP 08:15

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:45 PM

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Incident File Full Report

[Incident File #IN20200011085](#)SP20200031890 Attached by glau on Redacted -
RCMP 08:15

SP2020003189

0 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:45 PM

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Incident File Full Report

[Incident File #IN20200011085](#)SP20200031890 Attached by glau on Redacted -
RCMP 08:15

SP2020003189

0 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:45 PM

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Appendix 40

Incident File Full Report

[Incident File #IN20200011085](#)SP20200031890 Attached by glau on Redacted - RCMP 08:15

SP2020003189

0 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:45 PM

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Appendix 40

Incident File Full Report

[Incident File #IN20200011085](#)SP20200031890 Attached by glau on **Redacted - RCMP** 08:15

SP2020003189

0 - Continued-

Redacted - FINTRAC

B.C. Lottery Corporation file number(s) 2020-11085 refers. This file is also crossed ref to 20-12429.

Gerald Lau

BCLC – AML Investigations

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:45 PM

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Appendix 40

Incident File Full Report

[Incident File #IN20200011085](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 41

iTrak incident report bearing the Incident File #IN202012429 (BCLC0016437).

Incident File Full Report

[Incident File #IN20200012429](#)

Date/Time Occurred: 10:29 PM
Day of Week Occurred: Redacted - RCMP
Date/Time Created: 4:20 PM
Date/Time Closed: 9:30 AM
Closed By: glau

Record Creation Details

Department: Surveillance
Owner: malianza
Operator ID: malianza
Operator Name:
Personnel ID:
Card Number:
Job Position:
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: RYB 06

Details of Incident:

Daily Log #: DL20200156750
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Synopsis: Redacted - RCMP cash B/I \$9K (180x50s) D/S Amy
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 4:20 PM	malianza		
Redacted - RCMP	cash B/I \$9K (180x50s) suspected pass to	Redacted - RCMP	
Redacted - RCMP			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012429

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	PERSONAL INFO	Company:	CEO - Fuan Mining Company
Role:	Patron		

Full Name:	Redacted - RCMP	Company:	
Role:	Patron		

Supplemental Entries:

SP20200030170 Attached by malianza on Redacted - RCMP 16:21

Description During an unrelated review, Surveillance noticed a large buy-in for Redacted - RCMP who has a listed occupation as "housewife". Although this buy-in falls below FINTRAC-LCT and BCLC SOF reportable thresholds, there are some areas of this transaction that could be considered unusual and the following indicators were used as guidelines:

- 3.1.16 Client's occupation does not match the level or type of play with no known explanation for the difference
- 3.1.24 Client appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds
- 3.1.25 Client appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds
- 3.1.31 Client attempts to avoid being identified under the FINTRAC large cash transaction policy.

Footage shows the following with times approximate:

At 20:55 Redacted - RCMP and Redacted - RCMP arrive in Redacted - RCMP and enter salon. Redacted - RCMP places bundle of \$50s at MDB26 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). Redacted - RCMP receives chips and begins game play.

At 22:00 Redacted - RCMP and Redacted - RCMP access their phones at the same time. Redacted - RCMP at MDB26 and Redacted - RCMP seated outside salon. Redacted - RCMP briefly meets Redacted - RCMP outside salon. Redacted - RCMP goes to RYB06 and places bundle of \$50s for table buy-in.

At 22:30 DLR completes the count for a total of \$9K (180x\$50). Redacted - RCMP receives 6x\$1K, 4x\$500, 8x\$100, 8x\$25 in chips.

Redacted - RCMP and Redacted - RCMP access their phones. Redacted - RCMP does not have any chips on the MDB26.

At 22:40 Redacted - RCMP meets Redacted - RCMP outside salon.

At 22:42 Redacted - RCMP returns to MDB26 with chips.

Footage Redacted - RCMP UFT\20-12429

MLIANZA

30068

SP20200031918 Attached by glau on Redacted - RCMP 09:27

Description Cross ref file to 20-11085 Redacted - FINTRAC Incidents are all similar. BCLC Conditions

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200012429](#)

SP20200031918 Attached by glau on [Redacted - RCMP] 09:27

SP2020003191

8 - Continued-

(sourced cash/chip) applied to both [Redacted - RCMP] and [Redacted - RCMP] as of [Redacted - RCMP] (20-12989).

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:49 PM

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Appendix 42

iTrak incident report bearing the Incident File #IN202012665 (BCLC0016438).

Incident File Full Report

[Incident File #IN20200012665](#)

Record Creation Details	
Date/Time Occurred:	2/24/2020 4:11 PM
Day of Week Occurred:	Monday
Date/Time Created:	2/24/2020 4:12 PM
Date/Time Closed:	3/ 2/2020 1:38 PM
Closed By:	glau
Department:	Gaming Operations
Owner:	sloguisto
Operator ID:	sburns
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	Slots

Details of Incident:

Daily Log #:	DL20200168921			
Type:	Gaming			
Specific:	Unusual Financial Transaction			
Category:	Unsubstantiated			
Incident Status:	Closed			
Synopsis:	Large amount of small denomination bills inserted into ASLs 29-6-3, 29-6-4			
Checklist:	- Section 86 Form			
Narrative:				
	Created On	Created By	Modified On	Modified By
	2/24/2020 4:12 PM	sburns		
	Large amount of small denomination bills inserted into ASLs 29-6-3, 29-6-4			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012665

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	FRANCIS, Garry	Property:	River Rock (GCC)
Role:	Documenter	Department:	Security
Full Name:	LOGUISTO, Sean Francesco	Property:	River Rock (GCC)
Role:	Notified	Department:	Slots
Full Name:	NG, Calvin Kayeung	Property:	River Rock (GCC)
Role:	Notified	Department:	Guest Services

Subject

Full Name:	PERSONAL INFORMATION	Company:	
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	
Role:	Patron		

Supplemental Entries:

SP20200031026 Attached by malianza on Feb 24, 2020 16:16

Description

Surveillance noticed a bally alert grid large buy-in for ASL 29-6-4 and 29-6-3. Surveillance live monitored two individuals inserting a large number of small denominational bills, which had been bound with elastic bands without and with minimal play. SL/SM LOGUISTO was advised as UNAM took possession of the IVS ticket from UNAF machine and as UNAF was reaching another \$2K in \$20s in ASL 29-6-4. LOGUISTO identified UNAM as PERSONAL INFORMATION (SID 39421) who has a listed occupation as "Owner - Import/Export Herbals" and UNAF now identified as PERSONAL INFORMATION (new SID 289681). LOGUISTO and Executive Host NG Calvin approached and spoke with PERSONAL INFORMATION and PERSONAL INFORMATION (PERSONAL INFORMATION provided ID to LOGUISTO). After speaking with the LOGUISTO and NG, PERSONAL INFORMATION put \$20s rebound bundle with elastic band and placed it in her purse. A short time later, at 16:14 PERSONAL INFORMATION passed some \$20s to PERSONAL INFORMATION and PERSONAL INFORMATION passed and IVS ticket to PERSONAL INFORMATION. PERSONAL INFORMATION continued to game at slots, inserting \$20s when required to continue to game.

Review shows the following with times approximate:

At 15:46 PERSONAL INFORMATION and PERSONAL INFORMATION arrive on site in a Mercedes (l/p 6S827F), take skybridge to casino east entrance and enter slots prive.

At 15:50 PERSONAL INFORMATION removes bundle of \$20s from his pocket and PERSONAL INFORMATION removes a red plastic bag from her purse and from that plastic bag, removes bundle of \$20s and begins to insert bills.

At 15:50 PERSONAL INFORMATION and PERSONAL INFORMATION begin to insert small denominational bills into the machine reaching maximum limit and triggering a bally alert grid alarm.

The total of PERSONAL INFORMATION bills inserted was \$5160 in \$20s (258x\$20) - 100x\$20, 100x\$20 and 58x\$20 without game play. PERSONAL INFORMATION unwrapped a bundle of bills with an elastic band, which could indicate a \$2K bundle.

At 18:05 PERSONAL INFORMATION places two IVS tickets at CD01 for a total value of \$5539. Due to miscommunication with cage, PERSONAL INFORMATION was issued \$100 bills for the casino disbursement.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:50 PM

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Appendix 42

Incident File Full Report

Incident File #IN20200012665

SP20200031026 Attached by malianza on Feb 24, 2020 16:16

SP2020003102

6 - Continued-

Although [PERSONA] appeared to be gaming legitimately with funds used, incident opened as unusual as:

1. It is unknown if [PERSONA] occupation deals primarily in small denominational bills.
 2. Bills bound with elastic bands is not usual banking practice and has been an indicator that funds used did not originate from a recognized financial institution, such as a bank, atm, global cash&win.
 3. [PERSONA] has been involved in a previous UFT report - IN20180062746 - \$10K in \$50s without receipt.
 4. As [PERSONA] is a new Subject ID, little is known of [PERSONA] gaming activity.
- [PERSONA] subject file is still within the 2year validation period.

Footage FEB20\UFT\20-12665

MLIANZA
30068

SP20200031133 Attached by sloguisto on Feb 24, 2020 21:34

Description At approx 16:00, Surv/SM LIANZA informed Writer of a UAF feeding \$20's at ASL 29-6-2. Writer attended and observed UAF feed \$2000 in 20's into 29-6-2 before cashing out a ticket and attempting to feed another \$2000. LIANZA informed Writer \$2000 had been done before Writer arrived and UAF appeared to be giving the cash to a UAM who was gaming in Slots Prive. Writer recognized the UAM as [PERSONAL INFORMATION] a known Slot Prive player. UAF was spoken to by GRM NG with Writer present where she presented a BCDL identifying herself as [PERSONAL INFORMATION] and said she was [PERSONAL INFORMATION] wife (both have same address). [PERSONA] and [PERSONA] were advised against their actions as they are consistent with money laundering. They were informed that they may insert the funds and play them but they cannot feed and cashout without play. Both acknowledged and no further incidents occurred.

Sean LOGUISTO
Slot Shift Manager
23213

SP20200031240 Attached by fgarry on Feb 25, 2020 03:00

Description Security notified

Garry FRANCIS
S/S#82313

SP20200035215 Attached by glau on Mar 2, 2020 13:38

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds) or Service Provider
- Lack of established history in BC Casinos makes it premature to assume the money could be of

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012665

SP20200035215 Attached by glau on Mar 2, 2020 13:38

SP2020003521

5 - Continued-

- questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No direct involvement in substantiated UFT incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Inserting small bills in Slot machines

Name: PERSONAL INFORMATION (m)

BCLC SID: 39421

iTRAK profile (Started in 2007-SEP-30) – 7 Incidents, 2 UFTs, 0 Substantiated, 12 Media, 1 vehicles, 1 Associates

LCTs (92) – Past Buy in Range \$3,000 - \$10,000. Buy in total \$34,000. Disbursement \$1,644,399.99.

Name: PERSONAL INFORMATION (f)

BCLC SID: SID 289681

No BCLC History

On 2020-FEB-24, patron PERSONAL INFORMATION (SID # 39421) in company with PERSONAL INFORMATION (new SID 289681) was gaming at the River Rock Casino in Richmond, BC. PERSONAL INFORMATION and PERSONAL INFORMATION triggered a bally alert grid large buy-in for ASL 29-6-4 and 29-6-3. Alert is triggered once slot machine reaches a certain amount buy in with no play.

PERSONAL INFORMATION and PERSONAL INFORMATION were observed by surveillance to be inserting \$5160 in \$20s (258x\$20) with little or no game play. The \$20s were bundled in elastic bands. Both parties were spoken too by casino staff about their behaviour. PERSONAL INFORMATION and PERSONAL INFORMATION were informed that they may insert the funds and play them but they cannot feed and cash out without play. Both acknowledged and no further incidents occurred. Parties cashed out eventually for \$5639.

Surveillance:

Review shows the following with times approximate:

2020-FEB-24

15:46 - PERSONAL INFORMATION and PERSONAL INFORMATION arrive on site in a Mercedes (l/p 6S827F), take skybridge to casino east

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012665

SP20200035215 Attached by glau on Mar 2, 2020 13:38

SP2020003521

5 - Continued-

entrance and enter slots prive.

15:50 - **PERSONAL** removes bundle of \$20s from his pocket and **PERSONAL** removes a red plastic bag from her purse and from that plastic bag, removes bundle of \$20s and begins to insert bills.

15:50 - **PERSON** and **PERSONA** being to insert small denominational bills into the machine reaching maximum limit and triggering a bally alert grid alarm. The total of **PERSON** bills inserted was \$5160 in \$20s (258x\$20) - 100x\$20, 100x\$20 and 58x\$20 without game play. **PERSONA** unwrapped a bundle of bills with an elastic band, which could indicate a \$2K bundle.

16:00 - **PERSON** feeding \$20's at ASL 29-6-2. **PERSON** feeds \$2000 in 20's into 29-6-2 before cashing out a ticket and attempting to feed another \$2000.

16:14 - **PERSON** passed some \$20s to **PERSONA** and **PERSONA** passed and IVS ticket to **PERSON** **PERSONAL** continued to game at slots, inserting \$20s when required to continue to game.

18:05 - **PERSONAL** places two IVS tickets at CD01 for a total value of \$5639. Due to miscommunication with cage, **PERSONA** was issued \$100 bills for the casino disbursement.

CONCLUSION/ACTIONS TAKEN:

The writer noted from the casino report the following information:

PERSON and **PERSONA** came in the casino together

PERSON and **PERSONA** were at ASL 29-6-4 and 29-6-3

PERSON triggered a bally alert grid large buy-in at \$2k with no play.

PERSON passed some \$20s to **PERSONA** and **PERSONA** passed and IVS ticket to **PERSON**

Parties were warned by casino staff about their behaviour and no further incident noted.

This incident is an indicator of one of the signs of possible money laundering. Upon further review by the writer, it appears that it is not the case as the amount involved is small and both parties when warned started gaming legitimately.

Using casino slot machines to convert small bills into larger bills is a casino indicator of an unusual transaction but does not necessarily point to a case of laundering the proceeds of crime. Often players will use the machines to convert smaller bills to \$100's to allow them to buy in at a gaming table with less interruption to the other players at the table. Often customers have admitted to converting bills (so their money takes up less room in their wallet/purse/pocket), unaware that this type of behaviour is discouraged in BC Casinos.

FENG has a listed occupation as "Owner - Import/Export Herbals". Due to the small amount involved, it is reasonable to assume that **PERSONAL II** occupation could source his funds.

PERSON is new to BCLC casinos and has no history.

There is no information to indicate that **PERSONA** or **PERSON** funds were likely sourced from the proceeds of crime or that their activity at the River Rock Casino was anything other than an attempt at legitimate gambling.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012665

SP20200035215 Attached by glau on Mar 2, 2020 13:38

SP2020003521

5 - Continued-

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [REDACTED] and [REDACTED] or the funds they attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

SP20200035605 Attached by sbEEKSMA on Mar 3, 2020 06:30

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

Appendix 43

iTrak incident report bearing the Incident File #IN202012798 (BCLC0016439).

Incident File Full Report

Incident File #IN20200012798

Record Creation Details

Date/Time Occurred: 2/25/2020 11:03 AM
 Day of Week Occurred: Tuesday
 Date/Time Created: 2/25/2020 11:17 AM
 Date/Time Closed: 2/26/2020 2:00 PM
 Closed By: glau

Department: Gaming Operations
 Owner: ochow
 Operator ID: gcanonizado
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 24

Details of Incident:

Daily Log #: DL20200171126
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated - No Receipt
 Incident Status: Closed
 Synopsis: SID 25148, B/I of \$9.8K (\$8K 100s, \$1.8K 20s) in MDB24, CS Cindy. Patron was unable to show any SOF, thus asked to leave per TGM Oscar CHOW.
 Checklist: - Section 86 Form
 Narrative:

Created On	Created By	Modified On	Modified By
2/25/2020 11:18 AM	gcanonizado		

SID 25148 (PERSONAL INFORMATION), B/I of \$9.8K (\$8K 100s, \$1.8K 20s) in MDB24. Patron was unable to show any SOF, thus asked to leave.

Executive Brief:

Participants Involved:

Personnel

Full Name: LAU, Gerald
 Role: Documenter
 Property: Hard Rock Casino (GCC)
 Department: BCLC

Subject

Full Name: (PERSONAL INFORMATION)
 Role: Accused
 Company: Peijing Yin Di Oil Co

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012798

Supplemental Entries:

SP20200031415 Attached by vsuvajac on Feb 25, 2020 11:25

Description At approx 10:53 [REDACTED], SID#25148, present \$9800 for buy in at MDB#24 (\$100 x 80 and \$20 x 90 bills).

This will put [REDACTED] for total \$17900 buy in for last 24 hrs.

[REDACTED] was not able to provide any receipts and \$9800 transaction's canceled and money returned to [REDACTED]

[REDACTED] was asked to leave for 24 hrs and he left salon without further incidents.

Saved on M/FEB/SOF refusal folder F86 sent

V.SUVAJAC
26760

SP20200031458 Attached by vsuvajac on Feb 25, 2020 13:20

Description [REDACTED] was returned and was allowed to buy in \$20000 with CIBC bank draft.

V.SUVAJAC
26760

SP20200032029 Attached by glau on Feb 26, 2020 13:59

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- Funds were sourced via financial institution receipts
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Confirmed Source of Wealth (SOW) via OSINT report:
 - Confirming occupation/company.
 - Confirming residential ownership.
 - Any other wealth indicators contained within the OSINT.
- Funds originated via a monetary instrument from a recognized financial institution.
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Refused SOF Request.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012798

SP20200032029 Attached by glau on Feb 26, 2020 13:59

SP2020003202

9 - Continued-

Name: PERSONAL INFORMATION

BCLC SID: 25148

iTRAK profile (Started in 2006-SEP-23) – 63 Incidents, 17 UFTs, 6 Substantiated, 16 Media, 3 vehicles, 18 Associates

LCTs (273) – Past Buy in Range \$1800 - \$160,000. Buy In total \$5,007,820. Foreign Exchange \$19,334. Disbursement \$1,734,630. Acct Deposit \$610,000.

On 2020-FEB-25, long-time patron PERSONAL INFORMATION (SID # 25148) was gaming at the River rock casino in Richmond, BC. PERSON had earlier bought in for \$8100. PERSON later tried to buy in for \$9,800 (\$100 X 80 and \$20 X 90). PERSON total buy in (\$17,900) if accepted would have put him over the \$10k threshold within a 24hr period. PERSON did not have a receipt to source his last buy of \$9.8k. PERSON was asked to leave the casino for 24 hrs. PERSON returned shortly with a \$20k CIBC bank draft and was allowed to buy in.

CONCLUSION/ACTIONS TAKEN:

The writer noted in this report that PERSON is a long-time patron in BC casinos. PERSON buy ins are consistent with his past buy ins. The writer also noted that PERSON was gaming normally as he was putting reasonable amounts at risk and trying to buy in as needed to further gaming.

PERSON appears to be a long-time player, with an occupation that is in line with his buy ins.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as PERSONAL INFORMATION was unable to produce a receipt to source a \$9.8k (\$100's) cash buy in that put him over \$10,000 for the gaming session as such it was not accepted.

PERSON was able to return with a \$20K CIBC bank draft to source his fund and was allowed to buy in.

There is no information to indicate that PERSON funds were likely sourced from the proceeds of crime or that his activity at the River Rock Casino was anything other than an attempt at legitimate gambling

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest PERSON or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

Reporting Party:

Supervisor:

Incident File Full Report[Incident File #IN20200012798](#)

SP20200032029 Attached by glau on Feb 26, 2020 13:59

SP2020003202

9 - Continued-

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:50 PM

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Appendix 43

Appendix 44

iTrak incident report bearing the Incident File #IN202012826 (BCLC0016440).

Incident File Full Report

[Incident File #IN20200012826](#)

Date/Time Occurred: 1:33 PM

Day of Week Occurred:

Redacted
- RCMP

Date/Time Created: 1:42 PM

Date/Time Closed:

Closed By:

Record Creation Details

Department: Gaming Operations

Owner: rickylai

Operator ID: ddogra

Operator Name:

Personnel ID:

Card Number:

Job Position

Secondary Operator:

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation: DDBJ 05

Details of Incident:

Daily Log #: DL20200171451

Type: Gaming

Specific: Unusual Financial Transaction

Category:

Redacted - FINTRAC

Incident Status: Closed

Synopsis: Redacted - RCMP Attempted to Buy In \$ 600 in \$ 20 bills bringing the total to \$ 7820 and \$ 15,740 for the day. Approached by TGM Ricky Buy In denied and asked to leave for 24 hours and escorted him out from the west Lobby around 13:30. WS 13.

@ 14:15 Buy In \$ 3K in 100's at KBBJ 35 with receipt approved by TGM Ricky.

Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On

Created By

Modified On

Modified By

Redacted -
RCMP 1:42 PM

ddogra

Redacted -
RCMP Attempted to Buy In \$ 600 in \$ 20 bills bringing the total to \$ 7820 and \$ 15,740 for the day. Approached by TGM Ricky Buy In denied and asked to leave for 24 hours and escorted him out from the west Lobby around 13:30. WS 13

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012826

Participants Involved:

Personnel

Full Name:	LEE, Stone	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	LAI, Ricky	Property:	River Rock (GCC)
Role:	Reporter	Department:	Tables

Subject

Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Supplemental Entries:

SP20200031489 Attached by malianza on Redacted - RCMP 14:02

Description TGM LAI advised surveillance of a male patron, Redacted - RCMP who has a listed occupation as "owner, Redacted - RCMP" who could not provide necessary information as per BCLC SOF requirements when reaching \$10K in accumulated buy-ins in a 24hr period. Please see TGM LAI report for further details on the conversation. Total 24hr completed transaction was \$15,770 (19x\$100, 1x\$50, 691x\$20).

Redacted - RCMP the following was noted with times approximate:

At 15:23 Redacted - RCMP arrived on site in a Redacted - RCMP vest parkade and continues to enter casino west entrance.

At 15:29 MYRB03 - \$1K (10x\$100); at 15:54 KKB35 \$900 (9x100s); at 15:56 \$540 (27x20); at 16:00 RYBX5 \$940 (47x20); at 16:03 RYBX05 \$50 (1x\$50); at 16:17 KKB35 \$800 (40x20); at 16:22 \$440 (22x20); at 16:30 \$940 (47x20); at 16:33 \$1360 (68x20). In all buy-ins, PERS receives chips and continues to game. Total \$6970 (19x\$100, 1x\$50, 251x\$20).

Redacted - RCMP the following was noted with times approximate:

At 10:04 Redacted - RCMP arrives via skytrain and enters casino east entrance.

At 10:11 RYB06 \$1060 (53x\$20); At 10:36 RYBX01 \$280 (14x\$20); At 10:38 KKB21 \$700 (35x\$20); At 10:43 RYB01 \$1000 (50x\$20); At 10:49 FPG04 \$520 (26x\$20); At 12:21 RYBX5 \$840 (42x\$20); At 12:26 MDB05 \$440 (22x\$20); At 12:30 KKB21 \$520 (26x\$20); At 12:36 KKB21 \$260 (13x\$20); At 12:40 KKB21 \$540 (27x\$20); At 12:41 KKB21 \$220 (11x\$20); At 12:43 KKB33 \$680 (34x\$20); At 12:49 RYBX05 \$420 (21x\$20); At 12:50 RYBX5 \$620 (31x\$20); At 12:55 DDBJ05 \$700 (35x\$20);

At 13:03 \$800 (30x\$20) and transaction was denied, TGM LAI speaks with Redacted - RCMP who takes taxi off site at 13:28.

In all previous transactions, Redacted - RCMP receives chips and continues to game.

Total transaction on Feb 25 2020 = \$8800 (440x\$20) - including the \$600 attempted transaction, totaling \$9400 (470x\$20).

Footage Redacted - RCMP SOF REFUSAL20-12826

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012826

SP20200031489 Attached by malianza on [Redacted - RCMP] 14:02

SP2020003148

9 - Continued-

MLIANZA

30068

SP20200031953 Attached by rickylai on [Redacted - RCMP] 11:04

Description On [Redacted - RCMP] at approx 1310hr, Patron [Redacted - RCMP] presented \$600 in 20's as B/I who reached \$10K threshold in a 24 hours rolling period between two gaming dates [Redacted - RCMP] was approached for receipt but he cannot provide any bank receipt for them. He stated it is his own saving. Transaction was declined and E-transaction was offered to [Redacted - RCMP] stated he would think about it and left site without further incident.

[Redacted - RCMP] later returned to RRC and conducted a ATM B/I of \$3,000 & \$1500 with Bank account information provided.

[Redacted - RCMP] @ 14:21 \$3,000 B/I on KBBJ 35

[Redacted - RCMP] @ 15:07 \$1,500 B/I on RYB5.

All departments were informed

GPEB 19759

LAI, Ricky

RRC TGM

SP20200032344 Attached by stoles on [Redacted - RCMP] 04:25

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- Source of funds not confirmed
- History of small denomination/large buy-ins
- Known associates who are deemed suspicious by the gaming facilities
- Large volume of small denomination bills not typically disbursed by a bank or ATM.

Name: [Redacted - RCMP]

DOB: [Redacted - RCMP]

**Redacted
- RCMP**

Restaurant Owner

[Redacted - RCMP]

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012826

SP20200032344 Attached by stolee on [Redacted - RCMP] 04:25

SP2020003234

4 - Continued-

[Redacted - RCMP]

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On [Redacted - RCMP] writer reviewed this incident, surveillance footage shows that on the date of [Redacted - RCMP] at 1523:37 hrs patron identified as [Redacted - RCMP] arrived alone at the west parkade in a dark colored [Redacted - RCMP]

[Redacted - RCMP] was seen exiting the vehicle and headed towards the casino.

At 1529:06 hrs [Redacted - RCMP] was seen buying in for \$1000 in \$100 bills in MTRB03 and begins to play.
 At 1554:19 hrs [Redacted - RCMP] bought in for \$900 in \$100 bills on KKB35 and continues to play.
 At 1556:39 hrs [Redacted - RCMP] bought in for \$540 in \$20 bills on KKB35 and continues to play.
 At 1558:16 hrs [Redacted - RCMP] bought in for \$940 in \$20 bills on RYB5 and continues to play.
 At 1608:22 hrs [Redacted - RCMP] bought in with 1 \$50 bill on RYB5 and continues to play.
 At 1616:10 hrs [Redacted - RCMP] bought in for \$800 in \$20 bills on KKB35 and continues to play.
 At 1622:33 hrs [Redacted - RCMP] bought in for \$440 in \$20 bills on KKB35 and continues to play.
 At 1630:19 hrs [Redacted - RCMP] bought in for \$940 in \$20 bills on KKB35 and continues to play.
 At 1632:36 hrs [Redacted - RCMP] bought in for \$1360 in \$20 bills on KKB35 and continues to play.

Feb/25/2020 at 1004:50 hrs [Redacted - RCMP] was seen coming from the Sky Train station heading towards the skywalk.

At 1009:27 hrs [Redacted - RCMP] bought in for \$1060 in \$20 bills on RYB06 and begins to play.
 At 1036:09 hrs [Redacted - RCMP] bought in for \$260 in \$20 bills on KKB21 and continues to play.
 At 1037:09 hrs [Redacted - RCMP] bought in for \$700 in \$20 bills on KKB21 and continues to play.
 At 1041:06 hrs [Redacted - RCMP] bought in for \$1000 in \$20 bills on RYB1 and continues to play.
 At 1048:36 hrs [Redacted - RCMP] bought in for \$520 in \$20 bills on FPG4 and continues to play.
 At 1221:52 hrs [Redacted - RCMP] bought in for \$940 in \$20 bills on RYB5 and continues to play.
 At 1225:44 hrs [Redacted - RCMP] bought in for \$460 in \$20 bills on MDB05 and continues to play.
 At 12:29:22 hrs [Redacted - RCMP] bought in for \$520 in \$20 bills on KKB21 and continues to play.
 At 1236:10 hrs [Redacted - RCMP] bought in for \$260 in \$20 bills on KKB21 and continues to play.
 At 1240:05 hrs [Redacted - RCMP] bought in for \$520 in \$20 bills on KKB21 and continues to play.
 At 1241:20 hrs [Redacted - RCMP] bought in for \$220 in \$20 bills on KKB21 and continues to play.
 At 1243:18 hrs [Redacted - RCMP] bought in for \$680 in \$20 bills on KKB21 and continues to play.
 At 1248:43 hrs [Redacted - RCMP] bought in for \$420 in \$20 bills on RYB5 and continues to play.
 At 1250:46 hrs [Redacted - RCMP] bought in for \$620 in \$20 bills on RYB5 and continues to play.
 At 1256:42 hrs [Redacted - RCMP] bought in for \$700 in \$20 bills on DDB05 and continues to play.
 At 1302:30 hrs [Redacted - RCMP] attempted to buy in for \$600 in \$20 bills and was approached by site management due to [Redacted - RCMP] had already reached over the \$10,000 threshold with-in 24 hrs. Due to [Redacted - RCMP] was unable to provide receipt the transaction was denied.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200012826

SP20200032344 Attached by stolee on [Redacted - RCMP] 04:25

SP2020003234

4 - Continued-

During [Redacted -] recent visits, [Redacted -] was seen buying-in for \$13,900 all in \$20 denomination bills.

Review of [Redacted -] subject profile shows that [Redacted -] has no substantiated UFT incident on file, [Redacted -] have been generating LCTR since Oct/2013 with past buy-in ranging from \$1,000 to \$17,000 per gaming session.

Due to the amount of small denomination bills used by [Redacted -] during this visit, the incident is deemed suspicious.

Conclusion/Action taken:

Based on the indicators detailed within this report, this incident is [Redacted - FINTRAC] forwarded to BCLC AML Assistant Steve BEEKSMA for transfer to secure file share.

[Redacted -] casino activities will be closely monitored.

Stone LEE

BCLC Investigator

SP20200035662 Attached by sbeeksma on [Redacted - RCMP] 07:49

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200012826](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 45

iTrak incident report bearing the Incident File #IN202013907 (BCLC0016441).

Incident File Full Report

[Incident File #IN20200013907](#)

Date/Time Occurred: [Redacted - RCMP] 10:36 PM
Day of Week Occurred: [Redacted - RCMP]
Date/Time Created: [Redacted - RCMP] 10:55 PM
Date/Time Closed:
Closed By:

Record Creation Details

Department: Gaming Operations
Owner: cjames
Operator ID: adekraker
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Starlight Casino (GC)
Location: Back of House-Starlight Casino
Sublocation: CD 11

Details of Incident:

Daily Log #: DL20200185782
Type: Gaming
Specific: Unusual Financial Transaction

Category: [Redacted - FINTRAC]

Incident Status: Closed

Synopsis: [Redacted - RCMP] bought in for \$6,000 in unsourced 20's. Conditioned patron [Redacted - RCMP]
[Redacted - RCMP] denied \$6,000 buy in 20's for inadequate receipt.

Checklist: - Section 86 Form

Redacted -
FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 10:59 PM	adekraker	[Redacted - RCMP] 5:21 AM	adekraker
[Redacted - RCMP] bought in for \$6,000 in unsourced 20's. Conditioned patron [Redacted - RCMP]			
[Redacted - RCMP] denied \$6,000 buy in in 20's for inadequate receipt.			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200013907

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	DEKRAKER, Andrew	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Surveillance
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	TANG, Ngao Phong "Tony"	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	

Subject

Full Name:	Redacted	Company:	Redacted
Role:	Redacted - RCMP		
Full Name:	Redacted	Company:	Redacted - RCMP
Role:	Redacted		

Supplemental Entries:

SP20200034143 Attached by adekraker on Redacted - RCMP 03:08

Description

Redacted - RCMP

At approximately 21:45 hours on Redacted - RCMP surveillance was informed by cage supervisor Sushila DEVI of two patrons, each attempting to buy in with \$6,000, comprised entirely of \$20 bills. One patron, Redacted - RCMP is under BCLC conditions, and his buy in was denied. The other patron Redacted - RCMP was allowed to buy in.

Surveillance live monitored and reviewed this incident, and the following was observed.

At 21:42 Redacted and Redacted enter the gaming floor from the main lobby. Redacted is wearing a Redacted - RCMP jacket and carrying a wallet in his hand. Redacted is dressed all in black.

Redacted proceeds to CD12, and Redacted to CD 11. At 21:45 Redacted places a bundle of \$20 bills on the counter at CD 12. The bundle is later found to contain 300 x 20 dollar bills for a total of \$6,000.

From 21:54 to 22:08 Redacted can be seen at CD 11. He also places a bundle of 20 dollar bills on the counter, with his ID on top of it. This bundle also contains 300 x \$20 for another \$6,000.

At 21:49, while waiting for his chips Redacted buys in for \$300 at MRYB 7, also in 20's.

At 22:16 Redacted is seated at spot 10 on MRYB 7. He is approached by shift manager Tony TANG, and a brief discussion follows, where Redacted is informed that the receipt provided for his buy in was not acceptable.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200013907

SP20200034143 Attached by adekraker on [Redacted - RCMP] 03:08

SP2020003414

3 - Continued-

At 22:33 [Redacted - RCMP] and [Redacted - RCMP] leave VIP, appear to be headed out the front entrance, then turn around.

At 22:39, [Redacted - RCMP] and [Redacted - RCMP] enter the men's washroom near the buffet together. They exit two minutes later, with [Redacted - RCMP] closing his wallet as they do so.

The pair return to CD 11 at 22:43 [Redacted - RCMP] places a bundle of \$20 on CD 12, and the buy in is denied.

At 22:49 both patrons have further discussion with TANG, before exiting the casino through the front lobby, and leaving site

.Footage saved in exports\Suspicious financial transactionSV [Redacted - RCMP] 20-13907 [Redacted - RCMP]
and [Redacted - RCMP]

Form 86 sent

Andrew DEKRAKER
Surveillance Supervisor
GPEB 70646

SP20200035691 Attached by glau on [Redacted - RCMP] 09:10

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:51 PM

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Appendix 45

Incident File Full Report

[Incident File #IN20200013907](#)SP20200035691 Attached by glau on Redacted -
RCMP 09:10

SP2020003569

1 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:51 PM

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Appendix 45

Incident File Full Report

[Incident File #IN20200013907](#)SP20200035691 Attached by glau on Redacted -
RCMP 09:10

SP2020003569

1 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:51 PM

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Appendix 45

Incident File Full Report

[Incident File #IN20200013907](#)SP20200035691 Attached by glau on Redacted - RCMP 09:10

SP2020003569

1 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:51 PM

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Appendix 45

Incident File Full Report

[Incident File #IN20200013907](#)SP20200035691 Attached by glau on Redacted - RCMP 09:10

SP2020003569

1 - Continued-

Redacted - FINTRAC

B.C. Lottery Corporation file number(s) 2020-13907 refers.

Gerald Lau

BCLC – AML Investigations

SP20200035782 Attached by sbeeksma on Redacted - RCMP 12:35

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

SP20200039864 Attached by jaddison on Redacted - RCMP 07:37Description Redacted - RCMP
- Surveillance uploaded this file via FTP server to GPEB this date.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:51 PM

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Appendix 45

Incident File Full Report

[Incident File #IN20200013907](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 46

iTrak incident report bearing the Incident File #IN202014563 (BCLC0016442).

Incident File Full Report

[Incident File #IN20200014563](#)

Date/Time Occurred: 6:33 PM

Day of Week Occurred:

Date/Time Created: 1:43 PM

Date/Time Closed:

Closed By:

Record Creation Details

Department: Surveillance

Owner: malianza

Operator ID: malianza

Operator Name:

Personnel ID:

Card Number:

Job Position

Secondary Operator:

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation: MDB 31

Details of Incident:

Daily Log #: DL20200191605

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Synopsis: Redacted - RCMP \$3700 cash BI all 50s at the table; accumulated of \$ 7650 as per DS Sandra ws 15

Checklist: - Section 86 Form

Redacted -
FINTRAC

Narrative:

Created On

Created By

Modified On

Modified By

Redacted -
RCMP 1:44 PM

malianza

Redacted - RCMP buy-in 3.7K in \$50s accum. \$7.65K

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014563

Participants Involved:

Personnel

Full Name: HUSLER, Jim Property: Vancouver (BCLC)

Role: Documenter Department: BCLC

Full Name: BEREZOVSKI, Aleksandra (Sandra) Property: River Rock (GCC)

Role: Info From Department: Tables

Police Contacted: Taken From Scene: Police Contacted Result :

Subject

Full Name: Company:

Role:

Full Name: Company:

Role:

Full Name: Company:

Role:

Ban/Watch Details

Full Name

Redacted -
RCMP

Ban/Watch

Watch

Start Date

Redacted -
RCMP

End Date

Permanent

Type Of Ban:

Notes:

Reason For Ban:

Identification:

Supplemental Entries:

SP20200035855 Attached by malianza on Redacted -
RCMP 13:45

Description

Surveillance noticed the following with respect to Redacted - RCMP two buy-ins Redacted -
RCMP and Redacted -
RCMP involving \$50 denominational bills outside a FINTRAC-LCT reportable and BCLC
SOF requirement period,

Redacted -
RCMP who has a listed occupation as "Owner Import/Export Company" Redacted - RCMP
Redacted - RCMP and has three listed associates who are categorized as BCLC HRPP and/or
have BCLC HRPP sourced cash and chip conditions.

Footage shows the following with times approximate:

Redacted - RCMP

At 17:29 Redacted - RCMP meets Redacted - RCMP in salon and both go to smoking area where Redacted -
RCMP accesses his phone.

At 17:41 Redacted - RCMP and Redacted - RCMP enter 3F-Poker washroom. At 17:42 Redacted - RCMP and Redacted -
RCMP exits 3F-Poker washroom and enter salon.

At 17:45 Redacted - RCMP places a bundle of \$50s for table buy-in at MDB31. DLR completes the count for

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014563

SP20200035855 Attached by malianza on [Redacted - RCMP] 13:45

SP2020003585

5 - Continued-

a total of \$5K (100x\$50) [Redacted - RCMP] receives chips.

At 17:50 [Redacted - RCMP] places a bundle of \$50s for table buy-in at MDB31. DLR completes the count for a total of \$5K (100x\$50) [Redacted - RCMP] receives chips. Both begin game play.

At 21:18 [Redacted - RCMP] buys-in \$400 (8x\$50) receives chips and games.

At 21:40 [Redacted - RCMP] buys-in \$1.1K (22x\$50), receives chips and games.

[Redacted - RCMP]

At 12:54 [Redacted - RCMP] arrives on site in [Redacted - RCMP] south parkade and enters salon.

At 13:11 [Redacted - RCMP] buys-in \$1.3K (26x\$50) at DDBJ4, receives chips and games.

At 15:15 [Redacted - RCMP] buys-in \$500 (10x\$50) at KKB21, receives chips and games.

At 17:20 [Redacted - RCMP] visits [Redacted - RCMP] and several other associates at smoking area, including [Redacted - RCMP] and [Redacted - RCMP].

[Redacted - RCMP]

At 17:30 [Redacted - RCMP] enters salon washroom and [Redacted - RCMP] enters soon after. At 17:32 [Redacted - RCMP] exits washroom

followed by [Redacted - RCMP]. Both go to MDB31.

At 17:33 [Redacted - RCMP] places bundle of \$50s at MDB26 for table buy-in. DLR completes the count for a total of \$3050 (61x\$50).

[Redacted - RCMP] receives chips and begins game play at MDB31.

At 18:30 [Redacted - RCMP] places bundle of \$50s for table buy-in. DLR completes the count for a total of \$3.7K (74x\$50) [Redacted - RCMP] receives chips and continues to game.

Total transaction from [Redacted - RCMP] is \$15,050 (301x\$50).

According to CMP tracking card no. 633595, [Redacted - RCMP] visits do not appear to have been entered and/or located in CMP. TGM LAI was contacted for assistance and advised it did not appear that the buy-ins were entered into CMP. LAI discovered that [Redacted - RCMP] buy-ins were entered into CMP as Card No. 2480032.

Incident opened as both transactions involve (1) a suspected washroom pass/facilitation, (2) outside a FINTRAC reportable or BCLC SOF requirement period, (2) increase in level of play-visits (ten (10) visits in 2020 versus two (2) in 2019 and 2018), (3) and has tendency to game at multiple LMD Casinos (as per iTrak Activities & Specifics and Subject file comments). (4) it could be considered unusual for a BC Casino to issue large casino disbursements using \$50 denominational bills.

Footage [Redacted - RCMP] UFT20-14563

MLIANZA

30068

SP20200036878 Attached by jhusler on [Redacted - RCMP] 14:13

Description

**Redacted -
FINTRAC**

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:52 PM

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BCLC0016442.03

Incident File Full Report

[Incident File #IN20200014563](#)SP20200036878 Attached by jhusler on Redacted -
RCMP 14:13

SP2020003687

8 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:52 PM

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Incident File Full Report

[Incident File #IN20200014563](#)SP20200036878 Attached by jhusler on Redacted -
RCMP 14:13

SP2020003687

8 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:52 PM

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Incident File Full Report

[Incident File #IN20200014563](#)SP20200036878 Attached by jhusler on Redacted - RCMP 14:13

SP2020003687

8 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:52 PM

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Incident File Full Report

[Incident File #IN20200014563](#)SP20200036878 Attached by jhusler on Redacted - RCMP 14:13

SP2020003687

8 - Continued-

Redacted - FINTRAC

B.C. Lottery Corporation file number IN20200014563 refers.

JHUSLER

BCLC – AML Investigations

SP20200039971 Attached by sbeeksma on Redacted - RCMP 12:34

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:52 PM

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Appendix 46

Incident File Full Report

[Incident File #IN20200014563](#)

List of Attached Forms:

Prefix

Form Name

A

Redacted - FINTRAC

Reporting Party:

Supervisor:

Appendix 47

iTrak incident report bearing the Incident File #IN202014900 (BCLC0016443).

Incident File Full Report

[Incident File #IN20200014900](#)

Record Creation Details

Date/Time Occurred: 3/ 2/2020 11:24 PM
Day of Week Occurred: Monday
Date/Time Created: 3/ 4/2020 11:35 PM
Date/Time Closed: 3/ 9/2020 11:31 AM
Closed By: jhusler

Department: Surveillance
Owner: malianza
Operator ID: malianza
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: MDB 71

Details of Incident:

Daily Log #: DL20200192251
Type: Gaming
Specific: Unusual Financial Transaction
Category: Unsubstantiated
Incident Status: Closed
Closing Remarks: JH
Synopsis: SID 39758 CASH BI \$8.9K (104x50s 37x100s) MDB71 - DS Eric
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
3/ 4/2020 11:35 PM	malianza		
PERSONAL (SID 39758) CASH BI \$8.9k (104x\$50, 37x\$100s) MDB71			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014900

Participants Involved:

Personnel

Full Name:	HUSLER, Jim	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	PERSONAL INFORMATION	Company:	Jun Yang Real Estate
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	Senhai Trading Co., Ltd.
Role:	Patron		
Full Name:	PERSONAL INFORMATION	Company:	Beijing Venus Tech Trading Co Ltd
Role:	Patron		

Supplemental Entries:

SP20200036645 Attached by malianza on Mar 5, 2020 00:02

Description During an unrelated review the following was noted with respect to BCLC HRPP patrons: PERSONAL INFORMATION (SID 11279), PERSONAL INFORMATION (SID 39758) and PERSONAL INFORMATION (SID 43432).

PERSONAL INFORMATION - listed occupation - "Owner Real Estate Company-Jun Yang Real Estate."
Listed address - PERSONAL INFORMATION

PERSONAL INFORMATION - listed occupation - "Owner Trading Company-Beijing Venus Technology Trading Co. Ltd - Retired,"
Listed Address - PERSONAL INFORMATION

PERSONAL INFORMATION - occupation - "Chairman-Senhai Trading Co., Ltd."
Listed Address - PERSONAL INFORMATION

Footage shows the following with times approximate:

2020-MAR-01

At 20:29 PERSONAL INFORMATION arrives on site in her Rover (I/p PK505B) with PERSONAL INFORMATION and PERSONAL INFORMATION as passengers and all three enter salon.

At 20:38 PERSONAL INFORMATION removes a bundle of \$100s from a ripped wrapped paper at MDB28 for table buy-in. DLR completes the count for a total of \$10,000 (100x\$100). PERSONAL INFORMATION receives chips and begins to place wagers, while PERSONAL INFORMATION squeezes cards.

At 20:56 PERSONAL INFORMATION receives \$30K in chips for her PGF withdrawal. PERSONAL INFORMATION continues to place wagers while PERSONAL INFORMATION squeezes cards at MDB23, MDB24, and MDB28 during this gaming session.

At 00:10 PERSONAL INFORMATION separates and fans chips at MDB28 between her and PERSONAL INFORMATION and then goes to CD19 for cash out at 00:15, having placed \$124.6K in chips (24x\$5K, 4x\$1K and 6x\$100). PERSONAL INFORMATION takes the casino disbursement in cash.

At 00:39 PERSONAL INFORMATION drives PERSONAL INFORMATION and PERSONAL INFORMATION off site.

2020-MAR-02

At 23:05 PERSONAL INFORMATION arrives on site in her Rover (I/p PK505B) with PERSONAL INFORMATION and PERSONAL INFORMATION as passengers and all

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014900

SP20200036645 Attached by malianza on Mar 5, 2020 00:02

SP2020003664

5 - Continued-

three enter salon.

At 23:13 **PERSONA** removes bundle of \$100s from his satchel and removes some \$100s before placing the bundle on MDB71 for table buy-in. DLR completes the count for a total of \$8.9k (89x\$100). **PERSONA** receives chips and begins game play.

At 23:13 **PERSONA** removes bundle of \$100s from her purse and removes some \$100s before placing the bundle on MDB70 for table buy-in. DLR completes the count for a total of \$9K (90x\$100). **PERSONA** receives chips.

At 23:15 **PERSONA** removes mixed bills from her purse, removes some \$50s before placing the bundle on MDB70 for table buy-in. DLR completes the count for a total of \$8.9K (104x\$50, 37x\$100s).

PERSONA and **PERSONA** move to MDB71 and begin to game alongside **PERSONA**

Although BCLC HRPP patrons, **PERSONA**, **PERSONA** and **PERSONA** have a longstanding business relationship with BC Casinos, and these buy-ins are within the averages for these patrons, **PERSONA** and **PERSONA** removing bills to not meet FINTRAC-LCT threshold and BCLC SOF requirement for this cash buy-in and previous buy-ins for 2020 (re: DL20200185540 and DL20200185617), their previous UFTs involving large buyins in small denominational bills and drop-offs, their BCLC HRPP associates and multiple exchange of cash and chips adds an element of unusual activity with respect to their gaming activity.

Footage MAR20\UFT20-14900

MLIANZA

30068

SP20200039398 Attached by jhusler on Mar 9, 2020 11:17

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- Buy-in(s) reasonably linked to a casino disbursement within the same site or Service Provider
- Established/known business relationship
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Confirmed Source Of Wealth (SOW) via OSINT report:
 - Confirming occupation/company.
 - Confirming residential ownership.
 - Any other wealth indicators contained within the OSINT.
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014900

SP20200039398 Attached by jhusler on Mar 9, 2020 11:17

SP2020003939

8 - Continued-

SUMMARY:

On 2020-MAR-01 at approx 2029hrs a black Range Rover with BCLP: Pk505B was observed parking in the south parkade. The Range Rover was driven by PERSONAL INFORMATION SID#43432 and passengers/couple PERSONAL INFORMATION SID#11279 & PERSONAL INFORMATION SID#39758 were present in the vehicle.

All three exited the Range Rover and made their way over the skywalk into the Salon Prive at approx 2033hrs.

PERSONAL INFORMATION and PERSONAL INFORMATION sat down at MDB28, PERSONAL INFORMATION accessed her purse and removed a small stack of bills that were in paper.

PERSONAL INFORMATION placed the bills on the felt for the dealer to count, following the count it was confirmed that PERSONAL INFORMATION presented 100x\$100.00 for a total value of \$10,000.00.

PERSONAL INFORMATION began placing bets while PERSONAL INFORMATION squeezed the cards.

It is noted that PERSONAL INFORMATION requested \$30,000.00 from her PGF Account while she still had a few chips remaining from her \$10,000.00 cash buy in.

(As per the SOF declaration form the \$10k was from a \$13k verified disbursement from March 1st, 2020 @ 0231hrs.)

PERSONAL INFORMATION ended up playing with the \$30k funds on MDB23, MDB24 and MDB28 - LCT20200010293 showed that PERSONAL INFORMATION had a disbursement of \$124,600.00 at 0017hrs.

At approx 0010hrs PERSONAL INFORMATION was observed splitting her chips into two stacks close to PERSONAL INFORMATION

At approx 0015hrs PERSONAL INFORMATION walked up to CD19 front counter and cashed out for \$124,600.00.

At approx 0034hrs PERSONAL INFORMATION, PERSONAL INFORMATION and PERSONAL INFORMATION left the Salon via the 3rd floor door.

All three got into the Range Rover they arrived in and left the site at approx 0039hrs.

On 2020-MAR-02 at approx 2304hrs PERSONAL INFORMATION arrived on site (south parkade) in her Range Rover along with PERSONAL INFORMATION and PERSONAL INFORMATION

All three entered the Salon Prive at approx 2310hrs.

At approx 2313hrs PERSONAL INFORMATION was noted to have accessed his bag back after sitting down at MDB71 Spot#5. PERSONAL INFORMATION was observed removing several bills from a stack that he placed on the felt for the dealer to count.

Following the count it was confirmed that he presented \$8900.00 in \$100's.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200014900

SP20200039398 Attached by jhusler on Mar 9, 2020 11:17

SP2020003939

8 - Continued-

PERSONAL received his chips and began to place bets.

PERSO presented a small stack of bills from her purse at MDB70 spot#3, following the count it was confirmed that she presented 90x\$100.00.

PERSO received her chips and began to place bets.

At approx 2317hrs PERSO placed a small stack of bills along with her encore card on the table for the dealer.

Following the count it was confirmed that PERSO presented 37x\$100.00 & 104x\$50.00 for a total value of \$8900.00.

PERSO and PERSO moved over to MDB71 where they began to play next to PERSONAL

Conclusion

Following a review of the footage in relation to IN20200014900, it was noted the chance of verbal betting between PERSO and PERSONAL could have occurred but the funds were from sourced funds. There was also a documented disbursement on LCT20200010293, those funds for PERSO were believed to be used on her visit ~ March 2nd, 2020.

PERSONAL and PERSO are a known couple, PERSO and PERSO have multiple OSINTs on the BCLC AML Shared Drive.

PERSONAL INFORMATION SID#41892 is PERSONAL husband.

The RR Table Games Director has been notified of the observations with PERSO and PERSONAL

All persons named in this file will continue to be monitored when attending BC Casinos with reports generated and escalated as required.

JHUSLER

BCLC AML Investigations

SP20200039424 Attached by sbEEKSMA on Mar 9, 2020 11:46

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

Review suggested this group was gambling together (possibly pooling funds). None of them are on sourced conditions and attempting to circumvent. All but \$5,000 can be considered likely sourced to a disbursement.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045302 Attached by jhusler on Jun 2, 2020 07:38

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:53 PM

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Appendix 47

Incident File Full Report

[Incident File #IN20200014900](#)

SP20200045302 Attached by jhusler on Jun 2, 2020 07:38

SP2020004530

2 - Continued-

Description

As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

JHUSLER

BCLC AML Investigator

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:53 PM

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Appendix 48

iTrak incident report bearing the Incident File #IN202015039 (BCLC0016444).

Incident File Full Report

Incident File #IN20200015039

Incident File Full Report		Record Creation Details	
Date/Time Occurred:	3/ 5/2020 4:46 PM	Department:	Gaming Operations
Day of Week Occurred:	Thursday	Owner:	alaw
Date/Time Created:	3/ 5/2020 4:48 PM	Operator ID:	mhwiebe
Date/Time Closed:	3/ 6/2020 1:39 PM	Operator Name:	
Closed By:	stolee	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	KBBJ 20

Details of Incident:

Daily Log #:	DL20200200356
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Unsubstantiated - No Receipt
Incident Status:	Closed
Synopsis:	SID 10249 over 10k missed transaction - barred 24hrs SOF

"sid 10249 7k bñ (all 100s)
@16:05H B/I \$2.5K in 100's MDB07 Acc \$9.5K - Kar"

Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
3/ 5/2020 4:48 PM	mhwiebe	3/ 5/2020 4:52 PM	mhwiebe
SID 10249 PERSONAL INFORMATION over 10k missed transaction - barred 24hrs SOF			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200015039

Participants Involved:

Personnel

Full Name:	CHOW, Oscar	Property:	River Rock (GCC)
Role:	Documenter	Department:	Tables
Full Name:	WIEBE, Michael	Property:	River Rock (GCC)
Role:	Documenter	Department:	Surveillance
Full Name:	GAJIC, Velibor	Property:	River Rock (GCC)
Role:	Info From	Department:	Tables

Police Contacted: Taken From Scene: Police Contacted Result :

Subject

Full Name:	PERSONAL INFORMATION	Company:	Yu Tai Trading Co
Role:	Patron		

Supplemental Entries:

SP20200036970 Attached by mhwiebe on Mar 5, 2020 17:18

Description At approximately 16:50 Surveillance was advised that SID 10249 PERSONAL INFORMATION had surpassed the 10k daily threshold for buy ins on KKBJ20. At 16:25 PERSONAL INFORMATION had bought in for \$500 on KKBJ 20 this buy in was not added to his previous \$9.5k buy in due to him not presenting his encore card. Gaming Manager GAJIC, Velibor spoke to PERSONAL INFORMATION who was unable to provide SOF details for his buy ins and was then asked to cash out and leave for a period of 24 hours.

Footage saved to M:\RRSurv\2020\03 MARCH 2020\UFT\20-15039

WIEBE
24824

SP20200036977 Attached by vgajic on Mar 5, 2020 17:21

Description On the gaming date March 5, 2020 at approx. 16:45 Management was informed that patron PERSONAL INFORMATION SID 10249 reached \$10K but he didn't present his Encore card on his last buy of \$500 on KBBJ20 which put him at \$10K. When asked for receipt for his cash PERSONAL INFORMATION stated that he doesn't have receipt. His cash also couldn't be sourced from casino. PERSONAL INFORMATION stated that he lost track and didn't realized that he reached \$10K. PERSONAL INFORMATION was asked to cash out and leave for 24 hours. All departments were informed.

MRYB3 @13:18 - \$7,000

MDB7 @15:06 - \$2,500

KBBJ20 @16:45 - \$500

GAJIC, Velibor
Gaming Manager
GPEB #20787

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:53 PM

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Appendix 48

Incident File Full Report

Incident File #IN20200015039

SP20200036977 Attached by vgajic on Mar 5, 2020 17:21

SP2020003697

7 - Continued-

SID 10249 over 10k missed transaction - barred 24hrs SOF

"sid 10249 7k b/i (all 100s)

@16:05H B/I \$2.5K in 100's MDB07 Acc \$9.5K - Kar"

SP20200037262 Attached by stolee on Mar 6, 2020 06:41

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- Funds were sourced via financial institution receipts
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron is currently on full sourced cash/chip conditions that require receipts for all buy ins regardless of amount.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as [PERSONAL INFORMATION] (SID#10249) was able to buy-in for \$500 which would place him at the \$10,000 threshold with-in the 24 hrs. [PERSONAL INFORMATION] was later approached by site management and was unable to produce receipts therefore [PERSONAL INFORMATION] was asked to cash out.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200015039

SP20200037262 Attached by stoele on Mar 6, 2020 06:41

SP2020003726

2 - Continued-

Although [PERSONAL] was attempting to buy-in for \$500 and unable to provide receipt, it does not make the cash he attempted to use or these circumstances suspicious.

A review of [PERSONAL] subject profile was done. [PERSONAL] has been generating LCTR since Aug/2005 with past buy-in ranging from \$\$4,500-\$90,000 per gaming session.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSONAL] or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE

BCLC Investigator

SP20200037434 Attached by ochow on Mar 6, 2020 14:03

Description On the gaming date Mar 6 2020 @ 13:45, [PERSONAL] was spotted playing on RYBX05 and 24hrs barring has not expired yet from his previous gaming date SOF refusal. [PERSONAL] was approached by TGM CHOW and [PERSONAL] left site shortly after.

Table Gaming Manager

Oscar CHOW

GPEB22542

SP20200046407 Attached by stoele on Jun 30, 2020 15:28

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

Incident File Full Report

[Incident File #IN20200015039](#)

Reporting Party:

Supervisor:

Appendix 49

iTrak incident report bearing the Incident File #IN202016290 (BCLC0016445).

Incident File Full Report

Incident File #IN20200016290

Record Creation Details

Date/Time Occurred: 3/10/2020 4:25 PM
 Day of Week Occurred: Tuesday
 Date/Time Created: 3/10/2020 4:28 PM
 Date/Time Closed: 3/13/2020 1:19 PM
 Closed By: glau

Department: Gaming Operations
 Owner: sloguisto
 Operator ID: sburns
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: Slots

Details of Incident:

Daily Log #: DL20200216318
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: SID 118067 PERSONAL INFORMATION - Small bills inserted with minimal play - ASL 6-5-2, 6-5-3
 Checklist: - Section 86 Form
 Narrative:

Created On	Created By	Modified On	Modified By
3/10/2020 4:28 PM	sburns		
SID 118067 PERSONAL INFORMATION	- Small bills inserted with minimal play - ASL 6-5-2, 6-5-3		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016290

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	LOGUISTO, Sean Francesco	Property:	River Rock (GCC)
Role:	Notified	Department:	Slots
Full Name:	CHAN, Peter	Property:	River Rock (GCC)
Role:	Responding Officer	Department:	Security

Subject

Full Name:	PERSONAL INFORMATION	Company:	HeBei ShuangQiang Metal Mining LTD Ch
Role:	Info From		

Police Contacted:	Taken From Scene:	Police Contacted Result :
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Supplemental Entries:

SP20200040081 Attached by malianza on Mar 10, 2020 16:35

Description Surveillance received an alert grid triggered for a large buy-in at ASL 6-5-2 and 6-5-3. Review confirms the following with times approximate for BCLC HRPP patron, PERSONAL INFORMATION (SID 118067) who has a listed occupation as "CEO-He Bei Shuang Qiang Metal Mining LTD, China" and listed address of PERSONAL INFORMATION (in common with associates SID 152387 and SID 103867). PERSONAL INFORMATION has eight (8) associates with four (4) categorizes as BCLC HRPP and/or sourced cash and chip conditions.

At 16:55 PERSONAL INFORMATION arrives on site west parkade in a lexus (l/p JW139C) and enters casino west entrance.

At 16:56 PERSONAL INFORMATION begins to insert small denominational bills into slot machine and cash out IVS tickets.

**It should be noted that the \$20 denominational bills are old series that are not currently in circulation or widely used (appear to be 2004-2006 series). Moreover, PERSONAL INFORMATION had a recent casino disbursement on Mar 09 2020 and it would be unlikely and unusual that a BC Casino-RRCR location would issue small denominational bills and in this series of \$20 bills for a jackpot and/or casino disbursement.

SL/S LOGUISTO and SS CHAN were advised and spoke with PERSONAL INFORMATION

After the conversation, PERSONAL INFORMATION continues to game, primarily inserting the \$20 bills to game and holding onto the IVS tickets.

At approximately it was noticed that PERSONAL INFORMATION had removed some of the same series of \$20 denominational bills from her purse, which contained a brick of \$20s bound with elastic bands. LOGUISTO was advised of the brick of \$20s.

At 19:30 PERSONAL INFORMATION cashed out several IVS tickets at NRT8 before meeting two unknown individuals at jade/dogwood lounge and eating. PERSONAL INFORMATION enters dogwood baccarat room after her meal and continues to game, the two unknown individuals leave the lounge.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016290

SP20200040081 Attached by malianza on Mar 10, 2020 16:35

SP2020004008

1 - Continued-

*It should be mentioned that [PERSONAL] has been involved in eleven (11) UFTs with eight (8) substantiated - primarily involving small denominational bills.

Image of \$20 denominational bills attached to media for reference.

Footage MAR20\UFT\20-16290

MLIANZA

30068

SP20200040142 Attached by sloguisto on Mar 10, 2020 18:36

Description At approx 16:00, Surv/SM LIANZA informed Writer of a UAF feeding \$20's on ASL 6-5-3. LIANZA added that UAF appeared to be playing 6-5-2 and feeding & cashing out at 6-5-3 and that the \$20's used were all old series that are no longer issued by Financial institutions. Writer attended and observed what LIANZA mentioned. Sec/S CHAN was informed who joined Writer. As both were discussing the situation, UAF became aware and ceased feeding 6-5-3 and began to play it along with 6-5-2. UAF was making \$3 max bets on both machines consistently without changing to lower bets (even before Writer approached). UAF was approached and presented a BCSC identifying herself as [PERSONAL] (SID: 118067). LIANZA informed Writer that [PERSONAL] currently had an open LCT with over \$20K in Slot Disbursements (all verified wins). When asked about her actions (via GS CENTENO translating to Mandarin), [PERSONAL] stated she was making tickets to use for play due to superstition as she feels it's luckier in the machine. [PERSONAL] was informed she may play with the \$20's but inserting and cashing out without play is not permitted. [PERSONAL] understood and stated she wouldn't do it in future. When asked about the old series of \$20's and their origin, [PERSONAL] stated they were from her husband and he likes to collect those bills as he gets them (amassed over a number of months). As [PERSONAL] appeared to be gaming legitimately (indicative by max bets and LCT level play), [PERSONAL] was permitted to continue gaming which she did without further incident.

Sean LOGUISTO

Slot Shift Manager

23213

SP20200041530 Attached by glau on Mar 13, 2020 13:19

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- Established/known business relationship
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016290

SP20200041530 Attached by glau on Mar 13, 2020 13:19

SP2020004153

0 - Continued-

- Confirmed Source of Wealth (SOW) via OSINT report:
 - Confirming occupation/company.
 - Confirming residential ownership.
 - Any other wealth indicators contained within the OSINT.
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Small Bills in slot machines

Name: PERSONAL INFORMATION

BCLC SID: 118067

iTRAK profile (Started in 2012-MAY-02) – 90 Incidents, 13 UFTs, 8 Substantiated, 11 Media, 3 vehicles, 8 Associates

LCTs (260) – Past Buy in Range \$2,000 - \$85,000. Buy In total \$1,875,320. Disbursement \$4,217,972.29.

On 2020-MAR-10, patron PERSONAL INFORMATION SID # 118067 was at the River Rock Casino in Richmond, BC. PERSONAL INFORMATION triggered the large buy-in grid alert at ASL 6-5-2 and 6-5-3. Surveillance observed PERSONAL INFORMATION inserting small denominational bills into slot machine and cash out IVS tickets. PERSONAL INFORMATION was using old series \$20 denomination bills (Mostly used 2004-2006) to put into slot machines. The bills were bound by elastic bands. PERSONAL INFORMATION was seen inserting bills into one machine and gaming on the other machine. There was nothing unusual about PERSONAL INFORMATION gaming.

SURVEILLANCE:

2020-MAR-10

15:55 hrs - PERSONAL INFORMATION arrives on site west parkade in a lexus (l/p JW139C) and enters casino west entrance.

15:56 hrs - PERSONAL INFORMATION begins to insert small denominational bills into slot machine and cash out IVS tickets.

16:05 hrs – Surveillance started observing PERSONAL INFORMATION

16:25 hrs – Casino Staff approached PERSONAL INFORMATION about inserting \$20s and cashing out without play is not permitted.

18:58 hrs – PERSONAL INFORMATION continues gaming at slot machine. Not feeding \$20s but using her IVS tickets.

19:30 hrs - PERSONAL INFORMATION cashed out several IVS tickets at NRT8 before meeting two unknown individuals at jade/dogwood lounge and eating. PERSONAL INFORMATION enters dogwood baccarat room after her meal and continues to game, the two unknown individuals leave the lounge.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016290

SP20200041530 Attached by glau on Mar 13, 2020 13:19

SP2020004153

0 - Continued-

CONCLUSION/ACTIONS TAKEN:

The writer noted from the casino report that [PERSONAL] was using old \$20 denominations (Mostly used 2004-2006) to insert into the slot machines. The writer also noted that [PERSONAL] was in the casino for approximately 3.5 hrs and was gaming at slot during that time. Surveillance footage shows [PERSONAL] feeding the slot machines with \$20s and using the IVS tickets to further her gaming on another machine. The machines were side by side. It appears that [PERSONAL] was trying to game fluidly betting larger amount without having to be interrupted by continued bill insertion. [PERSONAL] would use the IVS tickets from one machine (Feeding \$20s) to further her gaming on the machine beside it. The estimated total [PERSONAL] used to buy in is under \$2k.

The writer also noted in the casino report that [PERSONAL] stated she was making tickets to use for her play due to superstition as she feels it's luckier in the machine. When asked about the old series of \$20's and their origin, [PERSONAL] stated they were from her husband and he likes to collect those bills as he gets them (amassed over a number of months). As [PERSONAL] appeared to be gaming legitimately (indicative by max bets and LCT level play), [PERSONAL] was permitted to continue gaming which she did without further incident.

[PERSONAL] listed her occupation as "CEO-He Bei Shuang Qiang Metal Mining LTD, China" and listed address of [PERSONAL INFORMATION] [PERSONAL INFO] SOF and SOW for this gaming session could be reasonably explained via her occupation and residence.

The writer could not observe any \$20 bricks that [PERSONAL] had in her possession from the surveillance footage.

There is no information to indicate that [PERSONAL INFO] funds were likely sourced from the proceeds of crime or that her activity at the River Rock Casino was anything other than an attempt at legitimate gambling.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSONAL] or the funds she attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Gerald Lau

BCLC AML Investigations

SP20200041553 Attached by sbEEKSMA on Mar 13, 2020 14:00

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:54 PM

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Incident File Full Report

[Incident File #IN20200016290](#)

SP20200041553 Attached by sbeeksmia on Mar 13, 2020 14:00

SP2020004155

3 - Continued-

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:54 PM

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Appendix 49

Appendix 50

iTrak incident report bearing the Incident File #IN202016347 (BCLC0016446).

Incident File Full Report

Incident File #IN20200016347

Record Creation Details

Date/Time Occurred: 3/10/2020 9:21 PM
 Day of Week Occurred: Tuesday
 Date/Time Created: 3/10/2020 9:22 PM
 Date/Time Closed: 3/11/2020 1:43 PM
 Closed By: lcousins

Department: Surveillance
 Owner: jmontero
 Operator ID: jmontero
 Operator Name:
 Personnel ID:
 Card Number:
 Job Position
 Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 31

Details of Incident:

Daily Log #: DL20200217000
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: **PERSONAL INFORMATION** (SID 56671) B/I \$9.7K in \$50 bills on MDB31.
 Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
3/10/2020 9:22 PM	jmontero		
PERSONAL INFORMATION (SID 56671) B/I \$9.7K in \$50 bills (194 x \$50s) on MDB31.			

Executive Brief:

Participants Involved:

Personnel

Full Name: COUSINS, Lynn Property: Vancouver (BCLC)
 Role: Documenter Department: Security

Subject

Full Name: **PERSONAL INFORMATION** Company: Jiyu investment ltd.
 Role: Accused

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016347

Supplemental Entries:

SP20200040218 Attached by jmontero on Mar 10, 2020 21:30

Description At approximately 21:15 hours on March 10, 2020, surveillance noticed a large buy-in on MDB31 comprised of \$50 bills. The buy-in totaled \$9,700 and was from patron **PERSONAL INFORMATION**.

PERSONAL II has an extensive history of UFT incidents and is associated to a number of high risk patrons. **PERSONAL INFO** occupation - Company Shareholder at Jiyu investment Ltd. - may account for the source of wealth, but does not account for why **PERSONAL INFO** buy-in was in small denominations.

Review showed **PERSONAL II** arrive on site at the south parkade at 21:06 as a passenger in a black BMW SUV BCLP: JW138B. They park on P4 and **PERSONAL II** exits on the passenger side. Three other Asian male individuals exit the vehicle. No passes or exchanges are seen.

At 21:11 hours, **PERSONAL II** presents a bundle of \$50 bills on MDB31 held together by rubber bands. After the buy-in is accepted and **PERSONAL II** receives his chips, he gambles normally.

Footage saved M/2020/03 March 2020/UFT. Section 86 form sent.

Justin MONTERO
Surveillance Relief Supervisor
83905

SP20200040607 Attached by lcousins on Mar 11, 2020 13:38

Description The individual who conducted the transaction(s) has no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Confirmed Source Of Wealth (SOW) via OSINT report:
 - Confirming occupation/company.
 - Confirming residential ownership.
 - Any other wealth indicators contained within the OSINT.
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016347

SP20200040607 Attached by lcousins on Mar 11, 2020 13:38

SP2020004060

7 - Continued-

On 2020-MAR-10 [PERSONAL INFORMATION] (SID#56671) presented 194x\$50=\$9.7 for buy in at RRCR. Surveillance at the site has deemed the buy in suspicious. [PERSONAL INFORMATION] was not asked for a receipt by site staff.

Incident details (all times are approximate):

2020-03-10 (INC200016347)

21:06 hrs

[PERSONAL INFORMATION] (SID#56671) arrived on site at the south parkade as a passenger in a black BMW SUV BCLP: JW138B. The vehicle was parked on P4 and [PERSONAL INFORMATION] exited on the passenger side. Three other Asian male individuals also exited the vehicle. No passes or exchanges observed.

21:11 hrs

The four men crossed over the Skywalk and proceeded directly to the Salon where [PERSONAL INFORMATION] removed a bundle of \$50 bills (sorted) from his inside left pocket. [PERSONAL INFORMATION] removed an elastic and a number of bills from the bundle and placed the remaining bills on MDB31 for buy in. After the count the buy in was confirmed to be \$9,700.

21:21 hrs

[PERSONAL INFORMATION] received his chips, moved to MDB 26 to join his colleagues.

No irregularities were noted in [PERSONAL INFORMATION] play.

[PERSONAL INFORMATION] was noted to be putting reasonable amounts at risk.

[PERSONAL INFORMATION] has been placed on sourced cash chip conditions as he appears to be avoiding receipting requirements.

[PERSONAL INFORMATION] will be monitored moving forward with matters escalated as deemed appropriate.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators. Therefore unless further information comes to light that may suggest [PERSONAL INFORMATION] or the money he attempted to use/used this date is linked to criminal activity, the investigator will not be submitting an STR to FINTRAC.

L. Cousins

BCLC AML Investigations

SP20200041485 Attached by sbEEKSMA on Mar 13, 2020 11:22

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

\$9500 in \$50's, player placed on conditions as a preventative measure.

SBEEKSMA

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:54 PM

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BCLC0016446.03

Incident File Full Report

[Incident File #IN20200016347](#)

SP20200041485 Attached by sbeeksma on Mar 13, 2020 11:22

SP2020004148

5 - Continued-

BCLC - AML Project Specialist

SP20200045687 Attached by lcousins on Jun 10, 2020 15:52

Description

As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

L. Cousins

BCLC AML Investigations

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:54 PM

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Appendix 50

Appendix 51

iTrak incident report bearing the Incident File #IN202016698 (BCLC0016447).

Incident File Full Report

[Incident File #IN20200016698](#)

Record Creation Details

Date/Time Occurred: 3/12/2020 2:07 PM
Day of Week Occurred: Thursday
Date/Time Created: 3/12/2020 3:02 PM
Date/Time Closed: 3/16/2020 1:24 PM
Closed By: stolee

Department: Gaming Operations
Owner: alaw
Operator ID: jdempsey
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: MRYB 19

Details of Incident:

Daily Log #: DL20200221862
Type: Gaming
Specific: Unusual Financial Transaction
Category: Unsubstantiated
Incident Status: Closed
Synopsis: SID# 10249 PERSONAL INFORMATION 4k b/i (all 50s) accumulated 9k.
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
3/12/2020 3:03 PM	jdempsey		
SID# 10249 PERSONAL INFORMATION	4k b/i (all 50s) accumulated 9k.		

Executive Brief:

Reporting Party:

Supervisor:

Commission of Inquiry into Money Laundering in British Columbia

Incident File Full Report

Incident File #IN20200016698

Participants Involved:

Personnel

Full Name:	LAI, Ricky	Property:	River Rock (GCC)
Role:	Notified	Department:	Tables

Subject

Full Name:	PERSONAL INFORMATION	Company:	HK Education Department
Role:	Patron		

Full Name:	PERSONAL INFORMATION	Company:	Yu Tai Trading Co
Role:	Patron		

Supplemental Entries:

SP20200041124 Attached by jdempsey on Mar 12, 2020 16:26

Description SID# 10249 PERSONAL INFORMATION bought in \$5,000 using 100x\$50 bills on MDB 22 at 13:42hrs.

14:03hrs PERSONAL INFORMATION bought in another \$4,000 using 80x\$50 bills on MRYB 19. It was noticed that he got this brick of \$50 bills from a plastic bag that had approx 2 more bundles of \$50 bills.

It was also noticed that he pulled out approx 20x\$10 bills from the 10k bundle possibly avoiding the 10k threshold for reporting to fintrac.

Arrival shows him drive on site in a Black BMD SUV (LIC# KC948L) alone but the met up with SID# 10239 PERSONAL INFORMATION in the Dogwood room.

They both walked to the Phoenix washroom at 13:29:48hrs then went to Salon room one at a time. 13:41hrs SID# 10239 PERSONAL INFORMATION exited the washroom then 13:41:43hrs SID# 10249 PERSONAL INFORMATION exited the washroom.

Heavy bets was noticed after both buy ins from SID# 10249 PERSONAL INFORMATION

Due to both parties going to the bathroom for a suspected cash pass and purposely attempting to avoid LCTR this UFT file was opened.

Form 86 sent
Saved to M: MAR / UFT.
J.DEMPSEY 23874

SP20200041144 Attached by rickylai on Mar 12, 2020 17:28

Description On Mar 12, 2020 at 14:45 hrs, Management was informed by Surveillance of Patron PERSONAL INFORMATION #10249 had reached over \$10K threshold in rolling 24 hours period.

Below is Patron's Transaction history:

Mar 11 MDB 24 \$5600 @ 14:26hrs
Mar 12 MDB 22 \$5000 @ 13:44hrs

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:55 PM

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Appendix 51

Incident File Full Report

Incident File #IN20200016698

SP20200041144 Attached by rickylai on Mar 12, 2020 17:28

SP2020004114

4 - Continued-

MDB 12 MRYB 19 \$4000 @ 14:06 hrs.

Due to multiple tracking sheet over two different gaming date, it was not noticed until later.

PERSONAL finished his gameplay and left site before the incident was noticed and being approached.

all departments are informed.

GPEB 19759

LAI, Ricky

RRC TGM

SP20200041146 Attached by mhwiebe on Mar 12, 2020 17:35

Description During the course of the review it was determined through communication with Gaming Manager LAI, Ricky that SID 10249 had a buy in yesterday at 14:26 on MDB 24. This buy in means that SID 102049 exceeded the 10k threshold in a 24hr period and SOF was not done.

Footage saved to M:\RRSurv\2020\03 MAR 2020\UFT\20-16698

WIEBE

24824

SP20200041469 Attached by stoles on Mar 13, 2020 10:37

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Buy-in(s) reasonably linked to another service provider's casino disbursement.
- Established/known business relationship
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016698

SP20200041469 Attached by stoles on Mar 13, 2020 10:37

SP2020004146

9 - Continued-

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

In this case the patron identified as [PERSONAL INFORMATION] (SID#10249) was able to buy-in for \$5,000 which placed him over the \$10,000 threshold with-in the 24 hrs. [PERSONAL] was not approached by site management and was able to buy-in for another \$4,000 without being approached. It was later found by site management that [PERSONAL] had bought in for total of \$14,600 without being approached.

Although [PERSONAL] was able to buy-in for over \$10,000 threshold and was not approached for receipt, it does not make the cash he had to used or these circumstances suspicious.

A review of [PERSONAL IN] subject profile was done. [PERSONAL] have been generating LCTR since Aug/2005 with past buy-in ranging from \$4,500 to \$90,000 per gaming session.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSONAL] or the funds he used this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE
BCLC Investigator

SP20200043273 Attached by sbeeksma on Mar 17, 2020 10:17

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

This patron was able to conduct the following buy ins within a 24 hour period without being approached for receipts:

Mar 11 @ 14:26hrs MDB 24 \$5600

Mar 12 @ 13:44hrs MDB 22 \$5000

MDB 12 @ 14:06hrs MRYB 19 \$4000

Total \$14,600

It was also noted that on the March 12th gaming session he appeared to have deliberately removed bills to keep his buy in on this session at \$9,000. It is suspected he was avoiding being approached for receipts suggesting he may not have been able to.

On 2020-MAR-17 footage transferred to the shared drive was reviewed. Of note the cash was not "bricks of bills" as described by surveillance. The cash appeared to be in neatly packaged smaller

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:55 PM

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Appendix 51

BCLC0016447.04

Incident File Full Report

Incident File #IN20200016698

SP20200043273 Attached by sbEEKSMA on Mar 17, 2020 10:17

SP2020004327

3 - Continued-

bundles (likely of \$5K each) held in an unmarked white plastic bag. There did appear to be something left in the bag after PERSONAL removed the bundle presented (partially) for buying in but it seemed to be a relatively smaller amount (one, maybe 2 bundles of similar size).

Reviewing his recent history confirms this is the 3rd incident categorized as UFT-Unsubstantiated this month whereby he has conducted buy ins in the \$9K range as if to avoid receipting requirements.

Although not enough indicators are present to reasonable establish the funds as possibly being proceeds of crime, as preventative measure PERSONAL has been placed on full sourced cash / chip conditions that will require he provide receipts for all cash buy ins, regardless of amount moving forward.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045813 Attached by stolee on Jun 15, 2020 14:44

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

Appendix 52

iTrak incident report bearing the Incident File #IN20090047956 (BCLC0016864).

Incident File Full Report

[Incident File #IN20090047956](#)

Record Creation Details

Date/Time Occurred: 12/ 4/2009 5:06 PM
Day of Week Occurred: Friday
Date/Time Created: 12/ 4/2009 5:06 PM
Date/Time Closed: 12/ 9/2009 9:10 AM
Closed By: mbajic

Department: Gaming Operations
Owner: dbryan
Operator ID: mbajic
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Starlight Casino (GC)
Location: Parking Lot-Starlight Casino
Sublocation: Public Parking

Details of Incident:

Daily Log #: DL20090956469
Type: Criminal Event
Specific: Suspicious Financial Transaction
Category:
Incident Status: Closed
Closing Remarks: mb
Synopsis: Yu ZHANG received two plastic bags containing \$300,000 from an unknown Asian male
Checklist: **Redacted - FINTRAC**

Narrative:

Created On	Created By	Modified On	Modified By
12/ 4/2009 5:06 PM	mbajic		
Yu ZHANG received two plastic bags containing \$300,000 from an unknown Asian male			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20090047956

Participants Involved:

Personnel

Full Name:	BRYAN, David R	Property:	Starlight Casino (GC)
Role:	Notified	Department:	Tables
Full Name:	BAJIC, Marko	Property:	Starlight Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	ZHANG, Yu Xiang	Company:
Role:	Patron	
Full Name:	LNU, STAR09-47956	Company:
Role:	Patron	

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
ZHANG, Yu Xiang	Watch	12/24/2009	Permanent

Type Of Ban:

Notes:

Reason For Ban:

Identification:

Supplemental Entries:

SP20090097426 Attached by mbajic on Dec 4, 2009 17:18

Description At approximately 16:30 surveillance observed Yu ZHANG receive two white plastic bags containing \$300,000 from an unknown Asian male.

Details:

16:29 ZHANG is standing at the edge of the curb in front of Schank's directing an approaching car. An unknown Asian male (wearing a black jacket, blue jeans, white shoes and carrying a black bag) gets out of a dark colored Audi (2 door) LP#117GPP and takes two white plastic bags out of the trunk.

16:30 ZHANG and the male walk into Shang's Noodle House together. After they enter Shang's, the male gives ZHANG the two bags. They both exit Shang's immediately afterwards. The male gets back in the Audi and leaves.

ZHANG goes back into the casino and drops the bags off at the Sierra Cage. The bags contained \$300,000 in \$20's, \$50's and \$100's. The money was for a buy in for MDB12.

Shift Manager David BRYAN was informed and viewed the footage.

GPEB form 86 sent.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20090047956

SP20090097426 Attached by mbajic on Dec 4, 2009 17:18

SP2009009742

6 - Continued-

Footage saved to:

Exports2/Suspicious Financial Transaction/December09/09-47956 12-04-09 Yu ZHANG and unk

SP20090097440 Attached by dbryan on Dec 4, 2009 18:40

Description

David Bryan
Shift manager
Starlight casino
12/04/09

On the gaming day of 12/04/09 I, David BRYAN received a call from surveillance requesting my presence in their camera room. When I arrived I was shown footage of Yu ZHANG waiting outside Shangs as a black car pulls up. An Asian male then gets out of the car and takes a plastic bag from the trunk of the car. He and ZHANG then walk into Shangs noodle bar whereupon he passes the bag to ZHANG. ZHANG then walked into Starlight whilst the other male left driving the car. Whilst the transaction looked suspicious the male who gave him the money is unknown to us. Therefore I could not determine whether he is a friend/ family member of ZHANG or whether he represents a criminal element. Based on this conclusion I have allowed him to buy in and play.

END OF REPORT.

SP20090098221 Attached by sheeksma on Dec 7, 2009 11:42

Description

Incident noted. Writer to attend site surveillance to review incident footage.

On 2009-DEC-07 writer attended site surveillance and reviewed incident footage with surveillance supervisor LUPU, loan. The footage supports what has been documented in this report.

The following subjects are identified in this incident:

ZHANG, Yu Xiang

BCLC ID 12559

DOB

PERSONAL INFORMATION

BCDL

PERSONAL INFORMATION

PERSONAL INFORMATION

Occupation: Businessman/Salesman

PERSONAL INFORMATION

BCLC ID 73761

DOB

PERSONAL INFORMATION

BCDL

PERSONAL INFORMATION

Address

PERSONAL INFORMATION

Occupation: "house wife"

-On 2009-DEC-04 at approx 1629hrs ZHANG, Yu can be seen waiting on the side walk of the casino driveway in front of the Shang's noodle house. A black Audi (A5?) BCLP 117 GPP pulls

Reporting Party:

Supervisor:

SP20090098221 Attached by sheeksma on Dec 7, 2009 11:42

SP2009009822

1 - Continued-

over in front of ZHANG. The sole occupant of the vehicle (unknown Asian male wearing jeans and a black "North Face" style jacket, wearing a shoulder bag) exits the car and proceeds to the trunk of the vehicle where he retrieves 2 white plastic bags that are bulging from their contents. ZHANG and the LNU male proceed into the entrance of Shang's and the two bags are passed from the LNU male to ZHANG just inside the restaurant. The LNU male departs the site and ZHANG enters the casino dropping the bags off at the high limit cage. The bags are emptied and found to contain CDN money totaling \$299,670 (a combination of 20's, 50's and 100 bills).

ZHANG plays in the VIP room for approx 5 hours winning approx 448K and has his wife PERSONAL INFO cashes out for him at approx 2139hrs for \$303,000. PERSONAL INFO receives the full amount in cash and ZHANG departs with an estimate of 285K in chips.

Breakdown of buy in denominations provided electronically to the writer from Starlight cage supervisor CLARK, Bob as follows:

2496 X \$20=\$49,920

399 X \$50=\$19,950

2298 X \$100=\$229,670

Total=\$299,670

Writer has submitted a request to obtain the RO on the suspect vehicle. Redacted - FINTRAC

Redacted - FINTRAC the RCMP upon the completion of the investigation. ZHANG has a lengthy history of incidents in BC casinos.

Updates to follow

2009-DEC-24 Writer received RO details on suspect vehicle. The Audi is registered to Bridgeport Collision and records indicate that the plates belong to a 2004 Honda Civic (grey in colour). Writer has rechecked the suspect plate and confirmed that the correct plate number was obtained. Bridgeport Collision has been the owner of license plates in past incidents of suspected loan sharking which on its own is highly suspicious.

Writer has placed ZHANG on watched status.

Redacted - FINTRAC the RCMP proceeds of crime division on this day for informational purposes only.

S BEEKSMA

BCLC

Casino Investigations

Reporting Party:

Supervisor:

Reporting Party:

Supervisor:

Appendix 53

iTrak incident report bearing the Incident File #IN20100052485 (BCLC0016865).

Incident File Full Report

[Incident File #IN20100052485](#)

Record Creation Details

Date/Time Occurred: 12/26/2010 12:03 AM
Day of Week Occurred: Sunday
Date/Time Created: 12/26/2010 12:03 AM
Date/Time Closed: 5/31/2011 4:11 PM
Closed By: canastasio

Department: Surveillance
Owner: dfolan
Operator ID: dfolan
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: Starlight Casino (GC)
Location: Back of House-Starlight Casino
Sublocation: Sierra Cage

Details of Incident:

Daily Log #: DL20101041641
Type: Criminal Event
Specific: Suspicious Financial Transaction
Category:
Incident Status: Closed
Synopsis: \$200,000 buy-in for Li Lin SHA in all \$20's
MON23
Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
12/26/2010 12:03 AM	dfolan		
\$200,000 buy-in for Li Lin SHA in all \$20's			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20100052485

Participants Involved:

Personnel

Full Name:	ADDISON, Jeff	Property:	Starlight Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION	Company:	Venetian Palazzo
Role:	Patron		

Full Name:	SHA, Li Lin	Company:	Yi Li Mining Co
Role:	Patron		

Full Name:	PERSONAL INFORMATION	Company:	Venetian Casino, Las Vegas
Role:	Patron		

Supplemental Entries:

SP20100122168 Attached by jaddison on Dec 26, 2010 00:43

Description At approximately 2358 hrs on December 25th 2010, Li SHA bought in at the Sierra Cage for \$200,000 all in \$20 bills. Surveillance live-monitored the whole event and observed the following:

At approximately 2355 hrs, SHA arrived in a black Mercedes with BCLP 993 TBG. SHA arrived by himself. At approx. 2356 hrs, SHA entered the trunk of the Mercedes and retrieved a large red Grand Villa bag. He walked to the Casino Lobby where he was met by various VIP personnel. SHA walked to the Sierra Cage where he layed red bag down on the Cash Desk. The bag contained \$200,000 in \$20 bills.

The buy-in commenced at approx. 2359 hrs and ended at approx. 0015 hrs and was for Salon 88. At approximately 0015 hrs, with the buy-in slip on the table, SHA received 40 x \$5,000 chips for a total of \$200,000 and began play.

At approximately 0025 hrs, SHA was joined at MDB 12 by PERSONAL INFORMATION and PERSONAL INFORMATION however they are not playing.

Footage saved in E1/ Susp.Trans./ DEC10/ 10-52485 12.25.10 200K Li SHA

Form 86 sent.

Updates to follow if needed.

EOR.

SP20100122205 Attached by jaddison on Dec 26, 2010 02:34

Description ****UPDATE****

At approximately 0220 hrs, SHA lost all and departed in his black Mercedes BCLP 993 TBG by himself.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20100052485

SP20100122205 Attached by jaddison on Dec 26, 2010 02:34

SP2010012220

5 - Continued-

EOR.

SP20100123211 Attached by dmerkel on Dec 29, 2010 07:32

Description Reports reviewed and video to be examined.

2010-12-30

This video was reviewed and noted to support the report submitted. Redacted - FINTRAC

Redacted - FINTRAC

DC MERKEL

BCLC Casino Investigations

SP20110001330 Attached by dmerkel on Jan 4, 2011 13:47

Description

Redacted - FINTRAC

IPOC, GPEB - BROWN, FRIESEN,

KARLOVCEC.

2011-01-07

Copy of this file forwarded to GPEB BROWN this date.

DC MERKEL

BCLC Casino Investigations

Reporting Party:

Supervisor: