

To: Michael Graydon [PERSONAL INFORMATION]
Cc: Terry Towns [PERSONAL INFORMATION], John Karlovcec [PERSONAL INFORMATION], Gordon Friesen [PERSONAL INFORMATION]
From: Bryon Hodgkin
Sent: Fri 2012-12-14 10:28:04 PM
Subject: Fintrac audit
[Exit Meeting Fintrac Audit Dec 2012.doc](#)

Hi Mike: Debriefing with Fintrac has been completed and it was generally good.

They started out by saying the our STR's are the best for detail next to the big five banks and that they use them for law enforcement sessions. Robbie was most complimentary to the effort John and his staff had put into assisting in the audit.

The volume of reports are acceptable and comparable to the other reporting agencies. We do not report as many STR's relating to occupations, but other jurisdictions give a one liner if the player appears to be spending more than their occupation warrants (ie housewife). We have been working on this and will continue to do so.

Our policy indicates we only use three factors in determining if and STR should be submitted, but they determined that we utilized the appropriate indicators and should amend our policy to reflect what we actually do.

They also feel that we need to have the service providers ask where the money comes from if someone attends with an inordinate amount of cash. We will move forward on this.

We will have one negative finding for under/late reporting. During our pre audit review, we surfaced six cases (out of the hundreds of report) that met the requirements and we submitted them late. They found two more during their review and this will be a finding.

We can expect the letter within four to six weeks and if they stick to the script on the exit interview, we will have the one finding with additional recommendations.

In closing I requested that Fintrac and BCLC work more cooperatively in moving forward with the upcoming changes and they indicated they will advise us of a process for that and he is considering John's request for quarterly meetings with BCLC

I have attached a more detailed briefing fyi.

I am on cell if you wish to discuss further. Thanks.

Bryon

Bryon Hodgkin
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PERSONAL INFORMATION

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