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**From:** Dickson, Derek FIN:EX  
**Sent:** Monday, August 31, 2015 9:55 AM  
**To:** Meilleur, Len FIN:EX  
**Subject:** AML Strategies

Hello Len,

Here are a few suggestions that could be implemented as AML strategies;

1. Set the maximum dollar value that will be accepted at \$10,000 at any one time at a venue. This is the same limit as the Fintrac LCT reporting requirement.  
Pro: Takes the discretion away from the service providers at the front end with a set monetary limit. Forces patrons to use legitimate means to gamble in our venues.  
Con; Revenue loss and likely BCLC non-agreement.
2. Create a GCA regulation/Ministerial Order relating to the due diligence on the money being brought into our venues  
Pro: GPEB creates the policy on how this will be implemented and interpreted. GPEB can audit for compliance and investigations will be conducted if there is non-compliance of both individuals and business entities. GPEB now owns the due diligence process that must be strictly adhered to.  
Cons: Revenue loss and likely BCLC non-agreement.

As you are aware, most of the AML-XDOG committees time was taken up discussing BCLC initiatives to reduce the reliance on cash. Very little time was dedicated to solutions driven by the committee.

A few other suggestions were surfaced by our investigators that may be of benefit to not only AML, but also loan sharking activities as well.

1. All persons accompanying a patron and watches them play must be identified.
2. Value chips should not be permitted to be taken from any venue. Value chips are RFID equipped and scanners can be placed at exit points to ensure none are leaving the venue.
3. No patron be permitted to play on behalf of another patron, for whatever reason.

Thanks,  
Derek

Derek Dickson  
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