



INTERNAL MEMO

To: Len Meilleur, Executive Director, Compliance Division, GPEB

CC: Anna Fitzgerald, Director, Compliance Division, GPEB
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From: Lynn Li, Commercial Gaming Auditor, Compliance Division, GPEB

Date: April 29, 2016

Subject: Review of Transactions from China's Sky Net list of 100 Most Wanted Fugitives (COMM-8661)

Background:

China has implemented a massive anti-corruption campaign. On April 22, 2015 it released a list of 100 alleged economic fugitives comprising former government officials, company executives, police officers and more, who are suspected of taking bribes, embezzling funds and laundering money. Sixty-six individuals on the list are believed to be in the U.S. and Canada.

Objective:

The objective of this review was to determine if any of the individuals identified on the alleged fugitive list are gambling or have gambled in BC gaming facilities and to identify any transactions occurring at BC gaming facilities.

Scope:

The scope is limited to a review of transactions or events recorded in BCLC's incident tracking system used in gaming facilities ("iTrak") by searching on each alleged fugitive's full legal name, date of birth or other aliases that are on the list and based on the assumption that the fugitives kept their name(s) and birthday(s) unchanged.

Approach:

We downloaded the "Sky Net" list from the Central Commission for Discipline Inspection Department website. The list contains the alleged fugitive's legal name or other aliases, picture, alleged crime, possible country of residence, China Resident Identity Card number and other possible holding passport(s) or ID(s), such as Hong Kong Permanent Resident ID, when they fled China. The Chinese names were translated to Pinyin (the pronunciation of Chinese characters). In addition, the China Resident Identity Card contains the person's date of birth listed in the Gregorian calendar format,

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which enabled us to extract the alleged fugitive's date of birth from the ID numbers provided on the list. This information is used as key search criteria in our review.

Illustration of date of birth information embedded in the Chinese ID number:



1	1	0	1	0	2	Y	Y	Y	Y	M	M	D	D	8	8	8	X
Address code					Date of Birth code						Order code			Checksum			

Review Summary:

We compared all 100 individuals on the Sky Net list to BCLC's iTrak system and found five matching player profiles. We compared photos of the individuals in iTrak with those posted on the Central Commission for Discipline Inspection Department website to confirm their identity. The results of our search can be summarized as follows:

1. Review of patrons in the iTrak system for incidents and status:

- All five patrons for which there was a match were barred by the BCLC AML ("Anti-money Laundering") Unit on October 27, 2015.
- Two of the five patrons had incident reports about them in the system for actions such as Chip passing and theft of others peoples' tickets.
- One individual had been categorized as a high-risk patron and marked "on watch" and monitoring on site for almost one year before being barred by the BCLC AML Unit.
- There is no information in iTrak detailing the reason why the other two individuals were barred.

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Details of Incident records:

	Full Name	China Resident ID number	Possible Date of Birth	Date left China	Possible Country of residence	Alleged crime	Reason for Barred
				2013.5	Canada	Falsely Making out Specialized VAT Invoices	Barred by BCLC AML effective 27, 2015. He was added to the BCLC High Risk patron list and placed on watch and monitoring on site. Active in casino, has 21 LCTs with a total amount of \$255,610.00.
				2010.9	Canada	Corruption	Barred by BCLC AML effective Oct 27, 2015. Several incidents of Chip passing. He had 10 LCT transactions between December 23, 2010 and January 21, 2015.
				2012.12	USA	Bribery	BCLC barring effective on Oct 27, 2015. Barred for BCLC Prohibition, no detailed information disclosed in the iTrak report. Redacted
				2013.7	USA	Corruption	Barred by BCLC AML effective Oct 27, 2015. no detailed information disclosed in the iTrak Redacted
				2011.2	Canada, New Zealand	Embezzlement	Barred by BCLC AML effective Oct 27, 2015. Complainant in theft of credits. Several incidents of claim of ticket theft from others or claim of damaged tickets.

2. Review of "Large Cash Transactions" ("LCT") in iTrak:

- Our review found that three out of these five patrons had LCT transactions. One of them (██████████) had 21 LCT transactions between January 28, 2014 and November 04, 2014. Another patron (██████████), was recorded in several incidents of chip passing and had 10 LCT transactions between December 23, 2010 and January 21, 2015.
- The primary gaming facility where these LCT transactions occurred was at the River Rock Casino in Richmond.

3. Analysis of iTrak data for types of identification used by Sky Net fugitives:

- Our review found that all of the five individuals matched to the Sky Net alleged economic fugitive list were using different identification from the one(s) released in the Sky Net wanted list, but used the same legal name. Four out of these five fugitives had obtained Canadian driver licenses.

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CONCLUSION

Five alleged individuals from China's Sky Net economic fugitive list issued by the Central Commission for Discipline Inspection Department were identified in BCLC's iTrak system. All five of them were identified, monitored and subsequently barred from all provincial gaming facilities by BCLC on October 27, 2015.

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Appendix I

Source: http://www.ccdi.gov.cn/xwtt/201504/t20150422_55183.html

Announced on 2015-04-22 17:57

Search Results: China "Sky Net" anti-graft operation: 100 Most Wanted Fugitives

Full Name	性别 (SEX)	身份证号码 (China ID number)	Possible Date of Birth	外逃所持证照信息 (Passport or ID)	Date left China	Possible Country of residence	Alleged crime	iTrak record search	iTrak BDAY search	Detailed information on matched individual		
										# of LCTs	Main locations of incidents	Reason for Barring
[Redacted]	男 Male	[Redacted]	[Redacted]	[Redacted]	2010.9	Canada	Corruption	No record	Same name and birthday found match.	10	River Rock	Barred by BCLC AML effective Oct 27, 2015. Several incidents of Chip passing. He had 10 LCT transactions between December 23, 2010 and January 21, 2015.
[Redacted]	男 Male	[Redacted]	[Redacted]	[Redacted]	2012.12	USA	Bribery	Yes. In iTrak. Barred. Confirmed same person by photo and name search	Yes date search worked (LCT: one foreign exchange transaction of \$3,600)	Redacted	River Rock	BCLC barring effective on Oct 27, 2015. Barred for BCLC Prohibition, no detailed information disclosed in the iTrak report. Redacted
[Redacted]	男 Male	[Redacted]	[Redacted]	[Redacted]	2013.7	USA	Corruption	Possible found same name, photo looks alike. Barred	Nobody with that birthday	Redacted	River Rock / Starlight Casino	Barred by BCLC AML effective Oct 27, 2015. No detailed information disclosed in the iTrak report. Redacted



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.2	Canada, New Zealand	Embezzlement	Photo looks really alike. Exactly same birthday. But already have Canadian driver license. Barred	Yes date search worked	7	River Rock	Barred by BCLC AML effective Oct 27, 2015. Complainant in theft of credits. Several incidents of claim of ticket theft from others or claim of damaged tickets.
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2013.5	Canada	Falsely Making out Specialized VAT Invoices	Photo looks really alike. Exactly same birthday. But already have Canadian driver license. Barred	Yes date search worked	21	River Rock	Barred by BCLC AML effective Oct 27, 2015. He was added to the BCLC High Risk patron list and placed on watch and monitoring on site. Active in casino, has 21 LCTs with a total amount of \$255,610.00.
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2003.4	USA	Corruption	Possible [REDACTED] (ITrak file obtained) - No LCT	Nobody with that birthday			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.1	Singapore	Corruption	No record	Nobody with that birthday			
[REDACTED] (other name: [REDACTED])	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.11	USA	Corruption, embezzle public funds	1. Possible [REDACTED] (no LCT) 2. Found [REDACTED] born in [REDACTED] from Shan Xi Province. 3. [REDACTED] (small LCT just exchange US\$) 4. Another [REDACTED] born in [REDACTED] from Shanghai.	Nobody with that birthday on [REDACTED] - one Caucasian man on [REDACTED]			



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2002.8	USA	Bribery	No record	Nobody with that birthday			
[REDACTED] (Other name - [REDACTED])	男 Male	[REDACTED]	[REDACTED]	Under [REDACTED]; Passport # under [REDACTED]	2001.11	New Zealand	crime of duty encroachment	No record	One birthday on [REDACTED] - see photo and one Caucasian female on [REDACTED]			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED];	2010.3	Canada	Bribery	No record	Nobody with that birthday			
Liu, Chang Ming	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2007.12	Singapore, USA	Illegal loans	No record	Nobody with that birthday			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2002.7	Australia, New Zealand	Abuse of powers	No record	Nobody with that birthday			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2009.11	Hong Kong	Corruption	No record	One South East Asian Male			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2007.4	New Zealand	Corruption	No record	Nobody with that birthday			
Xu [REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.5	USA	Bribery and abuse of powers	Possible: Xu, [REDACTED]	7 persons with that birthday. One male Chinese. No match.			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2004.1	England	Organize others to illegally cross the border	No record	9 persons with that birthday, checked each, one Chinese male. No match.			
Chen, [REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2013.4	England	Money Laundering	No record	6 female with that birthday. 3 Asian. No match.			



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2008.1	Thailand	Embezzle public funds	No record	2 male with that birthday. No Asian.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2008.9	France	Bribery	No record	3 male with that birthday, all Caucasian.			
Chen, [REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2002.6	USA, New Zealand	Embezzle public funds	No record	One male found with the birthday search. However, no detailed information shows the birthday and photo is really not clear.			
Liu, Chang Kai	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	1999.1	USA, Korea	Fraud, Cheat and Swindle	No record	Two persons with that birthday. All Caucasian.			
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2012.11	Canada	Corruption	No record	2 Asian female with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2009.11	USA, Australia	Corruption	No record	2 Asian Male with that birthday. No match.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2002.9	USA	Corruption	No record	4 persons with that birthday. All Caucasian male.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2002.9	USA	Corruption	No record	1 Asian male with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	1998.4	Thailand, Australia	Corruption	No record	1 Asian male with that birthday. No match.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2010.5	Thailand	Corruption	No record	Nobody with that birthday.			



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2010.8	USA	Conceal the proceeds of crime	No record	2 Asian with that birthday. All Males.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2013.8	Canada	Contract fraud	No record	1 Asian male with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2013.9	Canada, Australia	Corruption	No record	4 Asian males with that birthday. No match.			
Xu [REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2002.6	USA	Corruption, practise graft	No record	2 male with that birthday. All Caucasian.			
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2013.7	Canada	Embezzlement	No record	1 Asian male with that birthday. No match.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2001.12	Canada, USA	Corruption	No record	3 females with that birthday. No Asian.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2010.8	Australia	Bribery	No record	2 Asian males with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2014.2	Singapore, Korea or USA	Corruption	No record	2 Asian males with that birthday. No match.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2008.12	Australia	Corruption	No record	1 Asian female with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2012.12	Malaysia	Financial fraud	No record	3 Asian males with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2014.5	Indonesia or Singapore	Fraud, Cheat and Swindle	No record	5 Asian males with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2014.9	Thailand or Grenada	Corruption	No record	1 Caucasian male with that birthday. No match.			



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2000.1	USA	Contract Fraud	No record	1 Asian male with that birthday. No match.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2014.9	Thailand or Grenada	Corruption	No record	2 female Caucasian with that birthday.			
	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2007.1	Australia	Corruption	No record	All males. No female with that birthday.			
Xu, [REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2003.5	USA	Bribery	No record	Nobody with that birthday.			
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2002.8	New Zealand	Embezzlement and Concealment offshore deposits	No record	3 female Asian with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2012.3	Guinea-Bissau	Non-national staff of bribery	No record	1 Asian male with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2012.12	Hong Kong	Corruption	No record	3 Asian male with that birthday. No match.			
Xu, [REDACTED]	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.5	Canada or USA	Corruption	No record	No Asian. 4 all Caucasian.			
[REDACTED]	女 Female	[REDACTED]	[REDACTED]	[REDACTED]	2000.3	Australia	Bribery	No record	All males. No female with that birthday.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2011.12	Canada	Corruption	No record	3 Asian male with that birthday. No match.			
	男 Male	[REDACTED]	[REDACTED]	[REDACTED]	2010.12	USA	Bribery	No record	1 Asian male with that birthday. No match.			



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										# of LCTs	Main locations of incidents	Reason for Barring
	男 Male				2001.11	Canada	Corruption	No record	1 Asian male with that birthday. No match.			
	男 Male				2001.8	Australia	Corruption	No record	2 Asian males with that birthday. One has no photo. No match.			
	男 Male				2001.1	Canada or USA	Corruption	No record	3 Asian male with that birthday. No match.			
	男 Male				2013.6	Singapore	Non-national staff of bribery	No record	3 male with that birthday, no Asian.			
	男 Male				2002.12	Australia	Misappropriation of funds	No record	2 Asian males with that birthday. No match.			
	男 Male				2001.2	New Zealand	Corruption	No record	One Caucasian male.			
	男 Male				2011.1	Canada	Embezzlement	No record	3 Asian male with that birthday. No match.			
	男 Male				1998.5	USA	Practise graft	No record	3 all female. No match			
	男 Male				2009.2	New Zealand	Bribery	No record	1 Asian male with that birthday. No match. Second birthday: no Asian.			
	女 Female				2014.1	Canada	Falsely Making out Specialized VAT Invoices	No record	1 Asian female with that birthday. No match.			
	男 Male				2006.5	USA	Corruption	No record	1 Asian male with that birthday. No match.			



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										# of LCTs	Main locations of incidents	Reason for Barring
	女 Female				2000.1	Thailand	Corruption	No record	1 Asian female with that birthday. No match.			
	女 Female				1999.8	USA and Thailand	Falsely Making out Specialized VAT Invoices	No record	One female Caucasian.			
	男 Male				1998.6	USA	Fraud, Cheat and Swindle	No record	1 Asian male with that birthday. No match.			
	男 Male				2011.1	Canada	Corruption and abuse of powers	No record	3 Asian males with that birthday. No match.			
	女 Female				2011.5	USA	Bribery	No record	1 Asian female with that birthday. No match.			
	女 Female				2005.5	USA	Corruption	No record	1 Asian male. No female with that birthday.			
Chen, [REDACTED]	男 Male				2000.8	Canada	Corruption, Transfer harboring stolen goods	No record	4 Asian males with that birthday. No match.			
	男 Male				1999.5	USA	embezzle public funds	No record	1st birthday: no Asian. 2nd birthday: 4 Asian male. No match.			
	女 Female				1998.5	USA	embezzle public funds	Possible hit to SID 44053 [REDACTED] - see stored	No female Asian with that birthday.			



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										# of LCTs	Main locations of incidents	Reason for Barring
								profile				
	男 Male				2007.1	New Zealand	Corruption	No record	No Asian male with that birthday			
	男 Male				2010.2	USA	Contract Fraud and surreptitious withdrawing the contributed capital	No record	Two Asian males with that birthday. No match.			
	男 Male				2001.12	USA	Corruption	No record	5 persons with same birthday. All females.			
	男 Male				2009.4	Canada	Corruption, Bribery	No record	One female Caucasian with that birthday.			
	男 Male				2013.11	USA	Illegal absorbing public's deposits, Fraud Loans	No record	3 Asian males with that birthday. No match.			
	女 Female				2013.8	USA	Embezzlement	No record	1 Asian female with that birthday. No match.			
	男 Male				2008.12	Hong Kong	Contract Fraud	No record	4 Asian males with that birthday. No match.			
	男 Male				2012.7	Canada	Corruption	No record	1 Asian male with that birthday. No match.			
	男 Male				2003.1	Canada	Corruption and bribery	No record	1 Asian male with that birthday. No match.			
	男 Male				2012.2	England	Corruption	No record	4 persons with that birthday. All Caucasian.			



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										# of LCTs	Main locations of incidents	Reason for Barring
[REDACTED]	男 Male	[REDACTED]			2000.12	USA	Corruption	No record	4 persons with that birthday. All females.			
	男 Male				2012.9	Ghana	Falsely Making out Specialized VAT Invoices	No record	3 Asian males with that birthday. No match.			
	男 Male				2005.4	Canada	Credit Fraud	No record	2 Asian males with that birthday. No match.			
	男 Male				2014.3	Canada	Bribery	No record	3 persons with that birthday. All Caucasian females.			
	男 Male				2010.5	Korea	Embezzlement	No record	1 Asian male with that birthday. No match.			
	男 Male				2011.12	USA, Thailand, Philippines	Contract Fraud	No record	1 Asian male with that birthday. No match.			
	女 Female				2001.9	New Zealand	Corruption	No record	1 Asian female with that birthday. No match.			
	男 Male				2002.3	New Zealand	Corruption	No record	2 Caucasian males. No match.			
	男 Male				2001.8	Belize, USA, Korea	Corruption	No record	2 Asian males with that birthday. No match.			
Xu [REDACTED]	男 Male				2012.11	USA	Contract Fraud	No record	2 Asian males with that birthday. No match.			
[REDACTED]	男 Male				2014.1	St. Kitts and Nevis, Vietnam	Fraudulent loans, Forgery financial bills	No record	3 Asian males with that birthday. No match.			



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										# of LCTs	Main locations of incidents	Reason for Barring
	男 Male				2006.3	Sudan、Guinea	Bribery	No record	3 Asian males with that birthday. No match.			
	女 Female				2013.4	USA	Illegal absorbing public's deposits	No record	1 Asian female with that birthday. No match.			
	女 Female				2011.12	Canada	embezzle public funds	No record	2 Asian, all males.			
	男 Male				2014.5	USA	Bribery	No record	2 Asian males with that birthday. No match.			
	男 Male				2013.6	Canada	Bribery	No record	2 Asian. All females.			
	男 Male				2013.11	Sri Lanka	Bribery	No record	3 Asian males with that birthday. No match.			
	男 Male				1996.11	Hong Kong, Singapore, USA	Corruption	No record	5 persons with same birthday. All Caucasian.			
	男 Male				2012.3	Canada	Fraudulent loans	No record	3 Asian males with that birthday. No match.			

