UBC 🕅 SAUDER

SCHOOL OF BUSINESS

To:	Pam Skinner and Caroline Allen
From:	Kevin Arndt
Subject:	<i>Anti-Money Laundering in Real Estate</i> Course Evaluation Report from the UBC Real Estate Division
Date:	November 17, 2020

Anti-Money Laundering in Real Estate Course

The *Anti-Money Laundering in Real Estate* course (the "**Course**") launched successfully on January 6, 2020. The Course was open to managing brokers first and then to other licensees on January 9, 2020.

Course Statistics

The statistics in the table below are based on the period from January 6 to November 15, 2020.

Total Course Registrations	16,806
Course Completions	15,796
Did Not Complete	479
Course Completion Rate	97.1%
Course Evaluations Received	1,151
Course Evaluation Completion Rate	7.1%

Course Evaluation Summary

As of November 15, 2020, there were 1,151 course evaluations received and the vast majority of licensees who completed a course evaluation indicated that they felt that the Course material were well organized and of high quality (92.4%), the Course provided them with a valuable opportunity to improve their understanding of the anti-money laundering regime and compliance obligations (92.2%), and that their anti-money laundering knowledge had improved after taking the Course (92.1%). With respect to the time needed to complete the Course, 91.3% of licensees required three to six plus hours.

The course evaluations end with an open textbox asking for further comments and feedback. Given the number of comments received, the full Course evaluation report is attached.

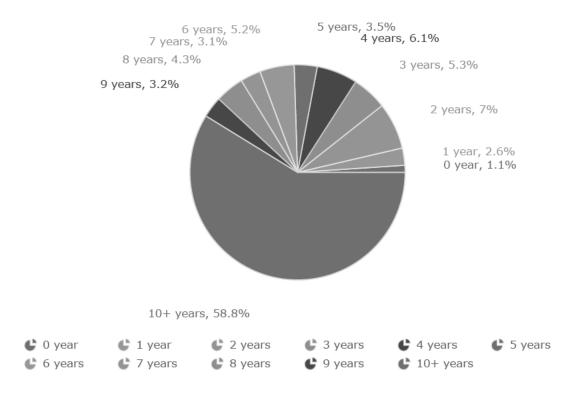


Real Estate Divsion

Evaluations Statistics
Course start date: 2020-01-01 Course end date: 2020-11-15
Chart type: Pie Course: All AML Courses □ show comments only □ hide comments

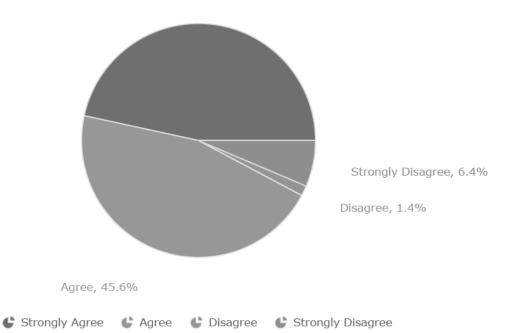
Total feedback: 1151

Statistic of Employed in the Real Estate Industry for years

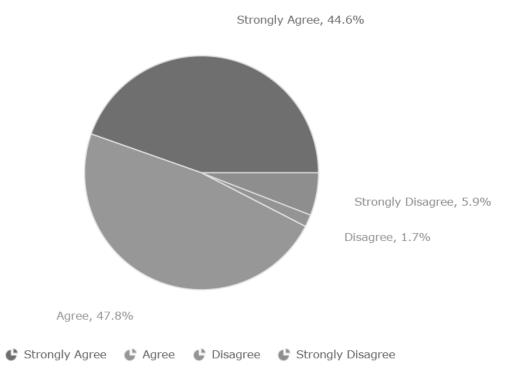


COURSE EVALUATION QUESTIONS

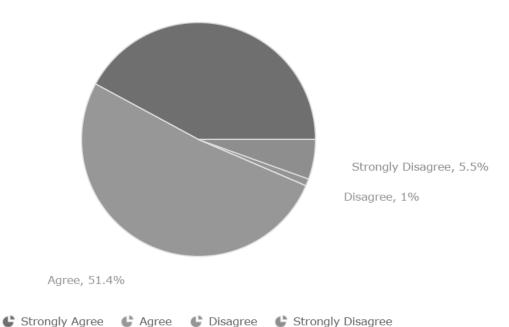
Q 1: The Anti-Money Laundering in Real Estate Course provided me with a valuable opportunity to improve my understanding of the anti-money laundering regime and my anti-money laundering compliance obligations.



Q 2: The Anti-Money Laundering in Real Estate Course materials are wellorganized and of high quality.

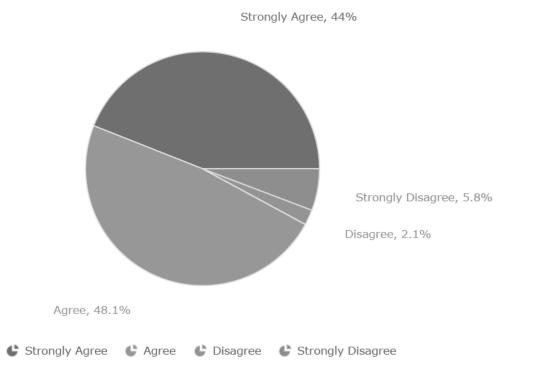


Q 3: The Check Your Knowledge questions throughout the modules and the Final Assessment tested my understanding of the anti-money laundering regime and my anti-money laundering compliance obligations.

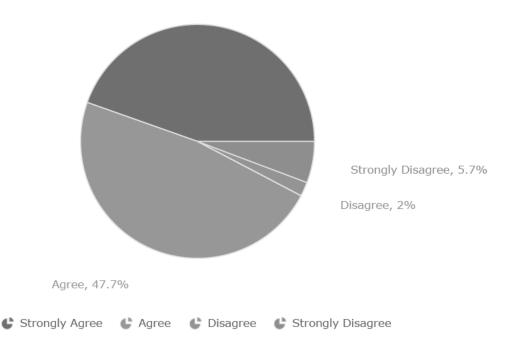


Q 4: After taking the Anti-Money Laundering in Real Estate Course, my

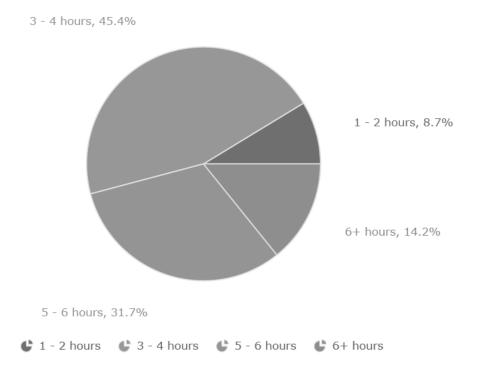
knowledge of the anti-money laundering regime and my anti-money laundering compliance obligations has improved.



Q 5: The online navigation of the Anti-Money Laundering in Real Estate Course was straight-forward.



Q 6: How many hours did you take to complete the Anti-Money Laundering in Real Estate Course?



Q 7: Is there anything else that you would like to share about your experiences in the Anti-Money Laundering in Real Estate Course?

 There is an error in your list of Other Reporting Entities. you have stated "Dealers in Previous Metals" Otherwise, well done and thank you for doing this.

- Is there a manual or book that I can use as reference in the future? i cant seem to find one associated with the course. It would be great to have one for future reference
- I was kicked out when I went to do the final evaluation. not sure why. thanks for allowing me to take the test.
- I think the questions should be formulated in a more straight forward manner. The purpose of the course is to educate and the testing shouldn't be designed to trip people up but rather to test their understanding of the facts.
- In Module 3 page 24: I believe that the part in parentheses should read Buyer and not Seller.
- Unfortunately I found the course wasn't really focused on the issues from the perspective of a realtor. It would be helpful to understand the expectations of reporting ML/TA when a realtor is concerned for their own safety. Realtors have told me that they would be fearful of reporting someone. So what action would be taken to protect the realtor from retaliation? I thought there were a few assumptions about the work done by realtors, such as believing realtors have their client's banking information and mortgage information. Realtors refer clients to mortgage brokers and the client tells their realtor if they have been approved for a mortgage. It is common for clients to not share their financial information. The course also seems to expect realtors know their client's source of funds and their wealth. Again, that information is not commonly shared with realtors. I wasn't clear what constitutes "dirty money" and how it differs from "clean money". If dirty money comes from the proceeds of selling drugs, and then comes clean by buying and selling real estate, what is the difference in physically identifying it? Why can't someone with dirty money just deposit it in a bank account? And finally, is it possible to have money laundering without there being criminal activity? The criminal activity examples are clear in the course. But I was wondering if someone is trying to take out money from another country and they are seeking refugee status or want to live in a better country, is that illegal in Canada? For example, if someone wants to flee Iran and sends money to Canada to be invested in real estate, is that illegal? And if they send their children to university in Canada and allow their kids to live in the house and have the house in their child's name, is that ALWAYS wrong and suspicious. I have experience with clients who have split up their family members, some living in Canada while others remain back home where they have businesses. They send money to their family and hope to live here permanently one day.
- Still some typos in the materials, but did not affect content
- well done!
- once more a course to justify your bureaucracy rather than solving the real problems in our industry. More paperwork/courses are not the answer but strong enforcement of our present code of ethics regardless of political correctness

would give us more credibility with the public. I should actually be paid to take this course as I have already paid for this with my taxes and dues to support a program that is ineffective at best with its disgusting conviction rate. You charge me another \$25 and take up my earning time while I pay your salary ,don't even give me points towards my license , while you increase your bureaucracy and my dues by 9+%. Plus you naively think having people who break these money laundering rules for personal gain will actually not have someone else complete this waste of time as they checked off your box saying they would do the course themselves. With English as a second language and in some case barely able to speak English there is no way this course could be read,under stood and questions honestly answered by some agents.

- The course was straight forward, but the IT people should have high lighted the "course resources" in order to take the final evaluation. This is the final step to access completion letter, and finish course. Nowhere is there an indication of this. Also when the receipt button is clicked - it says error. Fortunately was very helpful in solving this problem.
- This was a well structured, thorough and easily understood format. Really appreciated the opportunity to go through the course.
- Less repetitive and more focused on the practical application of detecting and reporting without all the fluff. This is a business course so make it point form if you want results.
- Modules 1, 5 and 6 were highly relevant and meaningful for improving my professional practice. The rest sort of felt like added fluff that detracted from the key information I should have been focused on leaning. A more streamlined course might improve knowledge retention.
- Some of he answers to the questions could be argued.
- The some of the presenters in the videos did not speak clearly and I had a hard time understanding them.
- Modules 5 and 6 are quite technical and full of "legalese" which I think is unnecessarily difficult. Realtors are sales people, not lawyers. How are we to know if someone is a "politically exposed person". This is asking too much of Realtors.
- This on-line course provides quite a clear idea of real estate transactions that may involve the suspicious Money Laundering. issue. Good guidelines were provided and it would be much easier to distinguish and better understanding of how to handle and report any such suspicious case in future. Thanks a lot for all your efforts and time to help improving realtors' knowledge.
- I found the course very dry and a little repetitive in areas
- Very useful course for myself as a Managing Broker.

- none
- Answer #6 I didn't take notice of when I started and when I finished so I don't know that, that is an accurate time allowance for me. Personally, I don't feel that a time allowance should even be noted. For some individuals it could make them feel more pressure and could result in their moving through the course at a faster pace resulting in less attention to the information and potentially more incorrect responses on their first attempt.
- This course is a political move to help the Government pursuade the general public that REALTORS are complicit in the money laundering venue which is incredibly unfair and mostly not true. The course materials were, in my opinion, hopelessly useless to help me differentiate between the general public & money laundering. Using my "intution" or acting on a "hunch" are neither professional nor useful in apprehending money launderers! Forcing professional REALTORS with many years of experience to take the time to complete this and CHARGING them for it is rubbish to say the least! PLEASE refrain from futher nonsense of this type!
- no
- Eye opening for me as to the scale and complexity good course.
- I went through the video on chapter 4, page 42, 4 times. It was because I was taken back to the suspicious example when I was on page 43 or pg 44.
- This course will increase all agents' awareness of the Anti-Money Laundering in Real Estate Industry.
- Suggest that an optional and additional opportunity to interact with an instructor would be useful for those of us that might have questions about a specific transaction thereby getting a little feedback on weather a suspicion reaches the bar for reporting. I suppose I can bounce it off my MBers once they have completed the course.
- typos Repoting entities pop-up lists "Dealers in Previous metals" -Should be precious Scheme 7 Aborter purchases. refers to Seller being unable to get financing. Should say Buyer. PCMLTFA Amendment: Reasonable Measures States you will no longer be required to keep a record of "When measures were unsuccessful" Should be "Why"
- none
- I found that a number of the linked articles were good to review. However after reviewing I was sent back to an earlier part of the course which meant I had to rewatch a video and answer questions for a second time. As the course went on I stopped reviewing the links as it was frustration. Also when doing the exam a checkmark came up after an answer so I assumed it was correct. Then I found

out that I did have three wrong but there wasn't a way for me to confirm the correct answer without going back through the test again and or the course itself. The objective here is to learn and understand . I work in an area where there appears to be very little direct money laundering. I understand the need for the changes going on. however it is strongly felt that his isa a"604 area code issue. Obviously not teh case. Given the time commitment it would be good to have the ability for those that do not have to retake the course to be able to have an interactive way of dealing with the balance of the correct answers. I had also expected a more detailed questions session. Good work overall. Thank you

- I DO BELIEVE THAT THIS A MUST FOR ALL TO TAKE
- I found it very informative
- it was not that easy to find on the UBC website My suggestion would be to send realtors a reminder notice via email with a simple portal to click and get into the course Second a manual on the course material would be helpful as a guide and as a reference book for realtors to refresh their memories
- Great course, something that we really should have had years ago but good to have it now.
- NA
- Good course and good idea to require this. As a Comptroller VP Finance/ Managing Broker of a property mgmt, Real Estate company I believe this all good information for licensees as well as brokers.
- COMPLETELY irrelevant to strata managers. A waste of strata managers time. We do not accept cash except in limited small transactions for fobs etc., we don't deal with mortgages or transactions and we don't look to see if someone is working or not, have a great lifestyle or is a "terrorist". This course should be for realtors and mortgages brokers and also rental (who may deal with cash transactions) only. Very disappointed just like the legal update for rental licence which was AGAIN focused on the realtor component.
- The video included in the sections didn't operated very well. I was repeatedly log out or the video would just stall. Clearly some technical problems associated with the video. I received some assistance from
- I like online courses and the delivery of this course was well done. There is a slim to no chance that I will ever have anything to do with a money launderer and there was just about nothing new or informative in the materials that would make me more acutely aware of a potential money laundering situation. The Realtors that run a clean practice probably feel likewise; the ones that do not if they exist, will likely do what they do.
- Good course! I wasn't aware of all the ways that money laundering happens a real eye opener.

- Wow that lady with last name has a horrible accent and it only detracts from the learning experience. Please replace her for monologues on video segments!
- I understand that money laundering has become an issue and at the same time I have a very difficult time believing this is the best way to fight the crime? I know it comes down the pipe, you have a mandate and you have to get the knowledge to the registrants. The fact that there are penalties for us to conform is silly. Chase the criminals and penalize them to the extent they need to punished. The resources being spent on education/compliance for our industry is absurd. If any of us were dealing with suspicious characters is it not enough to encourage us to report? I suppose not? An entire industry is being asked to learn and conform. In addition there are penalties if we don't do a good job. Seems upside down? Chase the criminals, catch criminals, penalize them not us!
- We should be able to register same-day (or in advance for the following morning) and take the course in the next 3 days. It is difficult to predict our schedules and therefore I believe all licensees would be able complete sooner, when we know for sure there is a window of time. I also think that once the course is available for access, we should receive a link. Regarding the course, I believe more emphasis should be placed on 3rd parties and deposits etc. There are many parents providing funds to their children and this should be used as a step-by-step example to ensure all realtors are in compliance. This was glossed over. And while I realize it was touched on and not necessarily the point of the course, I believe many agents don't ask the right questions and then properly fill out FINTRAC with respect to these 3rd parties.
- Well structured and laid out. I liked the example scenarios and what a real estate agent should do.
- I think we as real estate professionals in BC are already taking the burden of so many requirements on, why is the onus on us, once more? Just like our new Disclosure requirements, the bad, will always find a way, to circumvent the system no matter what. Why are we given one more burden, we already have to take on the risk of so much? This industry is becoming increasingly filled with landmines and those of us who feel we are fair and do good business are no longer loving this career.
- It will be better to educate or update us via email in the form of Newsletter / Legal Speaking instead of taking this course in future to save our time and money
- I spent extra time reading all the materials that were attached to the Course I found the Course extremely beneficial and definitely enhanced my knowledge. I went back a number of times to re-read the materials provided and ensure I had a full understanding of what my role is as a Real Estate Representative. Thank you for offering such an informative and very educating Course.

- Excellent course but instructions can be confusing at the beginning. I wish I had known about the PDF before i started to have it handy to make notes, as it only tells you at the end. Thanks for this.
- Took longer as I could not do it in one straight session
- Really good course, and learned a lot from here. Thanks for the training department to make it great for all of us.
- I enjoyed it, thank you.
- I've tried to find the link to the course .pdf after obtaining the completion letter and I can no longer find it!
- This course was dreadful. Videos? Seriously? I can read 4 times as fast as anyone can speak. Videos are a distraction. More importantly, this course highlighted that those governing us and those making demands under FINTRAC have no clue about what we do as Realtors. One part suggests that we can tell a money launderer by the clothes they wear and the car they drive. Another speaks of a client bringing cash to a closing - when does a Realtor attend a closing? Never, the deal closes in a lawyer's office. Another used an example of a person coming to an office to ask a Realtor to 'finalise' a deal that they have already struck to buy a house. What role does an agent have in that scenario? None - the parties have already made the deal. And if the buyer was a money launderer, why wouldn't they just continue to buy it, rather than present themselves to a reporting entity? Another suggests that people who buy houses without using a mortgage are suspicious. Rubbish - lots of people have money and most people with money are not money launderers. Another "clue" we're supposed to be on the lookout for is buyers who use unregulated lenders. How does a Realtor know what bank or institution is funding the mortgage? We have no role in that; the buyer goes to a mortgage broker and later tells me, "I've been approved, the broker says we can remove the subjects to." In short, if the knotheads who designed the FINTRAC program expect us to do their dirty work for them, they ought to first understand what we do. Secondly, if they want our respect in order that we wholeheartedly join their quest, they should be able to demonstrate the effectiveness of the program. I have been told that in 2016, 38 million records were created by reporting entities. That resulted in 5 convictions. Seriously - the cost to the overall economy in creating records, the costs of the FINTRAC program and they get 5 convictions? The whole thing is a joke.
- The Course PDF was most helpful and will be a great resource later on. However the PDF did not transcribe key points of the video clips which also had essential information. Also requiring completion within 3 days is too demanding and restrictive. Maybe extending timing to 5-6 days is more reasonable.
- What to do if you believe that a colleague is engaged in these activities. For example you note a specific case about a specific agent: "2019". I have a very difficult time believing that the people that was going on. There

could have been a little more discussion about that and a brief survey of existing tools for us to use to daylight the conduct to the Council. Please update this course frequently and make it a mandatory ANNUAL "ethics" component of PD Great work!

- Nothing at this moment..
- Practicing real estate both in BC and Alberta, this course rates as highly informative in Anti-Money Laundering in Real Estate. I found it offered strong, comprehensive detail to both Realtor and Client, obligations. I enjoyed the course. Thank You. Thank You!
- I suppose that Check Your Knowledge questions can be added couple more in each Module before the Final Assessment test. The Final Assessment test could be redone one more time if the first submission did not obtain a mark of 70% or higher. You want the student to learn the course materials well but not to fail the student due to obtaining the test mark less than 70%. Thank you for your attention.
- I believe money laundering is a serious problem however, I have concerns that Fintrac does an adequate job or even if they are able to meet the tasks this course indicates they are responsible for.
- When i went to other websites, i could not easily get back into the course, had to re-log in. should have a BACk button to get back to current course screen.
 Would appreciate a BMP summary sheet as a take away, with main points for realtor, that I can keep with my kits. This helps to reinforce the learning and practice. Maybe rejig the FINTRAC sheet to work better through the client vetting process. Thank you!
- Most of the materials are focusing on Trading (sales) but not much on rental/leasing.
- very helpful
- Some of the information provided was off-topic, unsubstantiated and inflammatory. Why keep repeating statistics around how many houses are owned by 'students' or 'home-makers'? These are political lightening rods with no proven connection to criminally linked money laundering. They're David Eby's talking points. Furthermore, some of the information presented as facts are not factual. For example, the "Expert Panel on Money Laundering in BC Real Estate" report estimate on money laundering in Canada and BC is completely based on an econometric model rather than any evidence - applying that same model to any country or jurisdiction and it'll spit out that money laundering occurs because it's based on the assumption that money laundering occurs. For someone who's actually looked into the report and the issue, parts of this course material is intellectually dishonest and academically un-rigorous. Present facts as facts and conjecture as conjecture. Leave politically spin out of course material.

- More case studies of actual convictions that were made from the reporting of suspicious transactions would be important to share so the licencees can actually understand the requirement.
- videos not working did what the tech said to do and still didn't work.
- It was great. I enjoyed it more than legal update.
- Nil.
- #6 I couldn't get it all. Felt like it was over my head
- •
- The delivery format of the course made it easy to be absorbed without me having to write down notes. Thank you.
- I am not being prejudiced (I am Asian also), but one of the video speakers, was hard to understand
- none
- It was a bit too long.
- The Anti-Money Laundering course was very informative and as such I have learned of other methods of identifying potentials of money laundering methods. Loved taking this course!
- The material was good and was fairly well organized. The delivery was rather dull and was not engaging. Some of the video readers were not good at all. I appreciate the fact that the course is mandatory, but it should still be engaging. As a post-secondary instructor, I feel it important to present information in a manner that enhances the students' ability to retain - that is not simply putting in bold. I would be happy to provide more details or offer my experience in the development of future courses.
- If the Videos speakers words were available even in the in MS Word Document, power point or ? for the Managing Brokers only. So I could review again. I printed off the full PDF document for my reference and have it in a 3 ring binder I am OLD school. I need to have printed versions of DOCUMENTS. I am not some 20s or 30s someone who only works off saved online documents. I can but it takes me longer to assess what I am looking for from an online document. You spent time and resources to generate the course, but you do not provide me as a managing broker with the complete version of documents and tools to used. I am NOT going to pass the course materials on to my brokerage licensee to make it easlier to complete the FINTRAC course, far from that. I get it with in the next 3-5-++ years managing brokers like myself will leave the real estate industry or become an "associate brokers" which would be a lot more enjoyable

and with very little; in fact, NO stress.... being a an expensive "baby sitter" is very stressful with how the new and newer licensee are being educated today.

- I truly appreciate the information and the course however, I fear that the solution is short sighted and puts realtors at risk. There is NO guarantee that our report would not end up in the hands of the person who is money laundering if the case goes to trial and we are at risk in this scenario. If someone is engaging in money laundering, they are engaging in other dangerous activities and this is the main reason why its not a good plan to have a reporting system like this. There needs to be an anonymous reporting option, it is not fair and it's not safe to put realtors in this position.
- I had to restart the course from Module 1 after spending a couple of hours working through the subsequent modules. The problem was that the hyperlinks to the supporting webpages and articles/reports opened in a new window but "bumped" me back to the home page when I closed it (and no, there was nothing "behind" the page when I closed it and yes, I did try opening in a new window). I have a very fast computer and internet connection but the videos were still "pixelated". Other than that, it is a good course.
- I enjoyed this course, and am looking forward to more learning opportunities. As a Strata Agent, I did not find this information as relevant as it would be for real estate agents/sellers. I would be interested in learning what things strata agents can look for, and how/who we can notify of suspicions, if any.
- It was very interesting, however I found it very hard to understand when the Korean lady was speaking. It was a bit hard to understand with her accent.
- It would be great to get a notes package that can be referred to for the future.
- great course, actually learned a lot of valuable information
- As a Managing Broker I would like to be able to have a complete PDF of the course now that I am finished including the PDF links to the legislation cited so that I can create materials for some brokerage delivered content to establish standard of practice guidelines for the brokerage and evaluate what we are already doing.
- This is an excellent course.
- Although the course is completed and I did learn a lot of staggering information in the course, I feel only slightly more equipped to handle dealing with FINTRAC requirements, especially given the potential severity of the fines/prison time etc that can arise from misunderstanding my reporting requirements or business relationships with people. I find it interesting that there is software to determine whether a drivers license sent to me is valid, yet I have never been given the skills to tell whether a drivers license or passport physically put in my hands is authentic or not. I feel like there is a big miss in this section. Putting the responsibility on Real Estate Agents to determine authenticity of a piece of

identification needs to be better thought out. Is this software available? Is this a new thing or has it always been a requirement? Is this something the Real Estate Industry is Purchasing as a group? It has been an eye opener.

- NIL
- I have a more thorough understanding of how money is laundered.
- I am wondering how you determine that the members who complete this course are really the individual and not a substitute?
- The videos are unnecessary. The information on the slides can be learned in 30 seconds to one minute, and being forced to watch the video for 4 or 5 minutes actually distracted me from learning.
- I found the course informative but contained too much information
- The quality of the video presentations were very poor. The presenters were monotone at best and made the videos the poorest part of the course.
- Actually enjoyable and very educational.
- Informative, well laid-out course.
- Too many acronyms, after awhile they start to put you to sleep. Nobody can possibly remember that many.
- Knowledgeable, & very informative.
- Good course. I found it informative. You may want to fix a typographical error on the page describing who the reporting entities are under the PCMLTFA on page 10 of 20 in that module. The list provided, among others noted weredealers in "previous" metals and stones where I presume the writer of the course meant to say PRECIOUS METALS AND STONES.
- I have a stronger understanding of the underlying worldwide issues and do not want Canada to be an easy mark.
- I understand we are more in contact with clients to know more details about transactions, but I do not believe the onus should be on us. It should be on lenders and lawyers who receive the payments. If it was really a criminal I was dealing with, that criminal will have the means to find out who reported them and that poses a danger for us.
- There was a technical issue when I was taking the course. I had completed modules 1-5 but could not start module 6. I called tech support and they asked me to logoff and wait for 40 minutes or so. After about 2 hours, I logged back in and completed the course.

- Some of the formatting and spelling was incorrect
- I have been selling real estate for almost 30 years serving my community with integrity. These costly changes to the industry are not necessary. If the Realtors choosing dishonesty in their practice, ignoring our code of ethics, loose their licence for life, I believe the standard of real estate would be of high integrity.
- Would like to see future versions of this course to be condensed, with emphasis on updates/changes since 2020.
- Trouble when going into links had to restart module and listen to videos again. Not a bad thing but wasted some time.
- This course are very useful for me since lots suggestions, even small one, for instance, what kind of questions I should ask the clients if I feel suspicious but will not make the clients mad. That will make me keep reasonable warning for anythings I feel uncomfortable at mean while still keep good relationship with customer.
- Quite changeling.
- Not so much a question about my experience with the course, but rather a question of why so much time is spent dealing with cash in transactions. My own brokerage and my Real Estate Board (Fraser Valley) do not allow cash transactions. Seems to me that the time (or course content) would be more valuable if it placed more emphasis on how to identify suspicious activity.
- Took me 3 hours with a couple of tea/bathroom breaks. Was easy to get thru and I learned a lot.
- Course would have had more impact with more consistent and effective speakers to deliver the material in the videos.
- I found the course very valuable but do have a couple of comments about it. Considering the vast amount of information brought forward, I was quite shocked to see the final assessment was only 10 questions. I do feel that there should have been an assessment of 5-10 questions following each module, or at least 20-30 questions at the very end. The final assessment of 10 questions does not seem in line with the amount of information included in the course and the amount of information we need to retain upon completing the course. One other matter that concerned me was videos using someone where English is not their first language. I honestly had a very difficult time following along with the videos where this was the case, as the language was not clear and was hard to understand at times. Other than that, I thought the course was very well done.
- I work on the Sunshine Coast so I appreciate the ability to get access to online courses and not need to drive to the Lower Mainland.

- It was difficult at the beginning to find the menu from the home page it was hidden on my computer and had to be pulled from the side and should have been explained.
- I called **a second twice**, and left messages for call back, I didn't get the call back. Sometimes the video page did not play video, and I can not go to next page.
- This course was well laid out and provided great information. I truly have a better understanding of Anti-Money Laundering than I had prior to taking the course.
- I have seen photos of man from Ottawa with known and convicted terrorists who has given millions of dollars to terrorists. He has a foundation for laundering money and is worth millions without ever working much in his life? He should be reported and his name is Justin!
- This course appears to be irrelevant for strata managers.
- Some of the points were a stretch, such as the claim that all "cash" purchases should be considered suspicious. In my experience frequently commercial properties are traded without any financing in place. I also would suggest that you might consider adding another possible avenue that real property can be used for money laundering: retail rents. While as a licensee we cannot control the business a retailer does, if they are willing to overpay for rent and the nature of the business doesnt justify that level of cost, we should be suspicious. Many retail businesses can be used to launder money. Its particularly easy in restaurants and bars.
- Enjoyed the videos...
- No
- The first video kept sticking. very annoying!
- The Pop Up issue was troublesome, and it ended up working for me regardless....
- Is there an answer key for the questions I got wrong in my final assessment?
- no
- More Case Studies & practical cases.
- The course did not provide a definition as to 'unregulated' mortgages. We are not provided with a STR form. Unrepresented Buyers are not taken into consideration. Definition not provided for "politically exposed persons". Why aren't lawyers accountable?

- After successfully completing / answering a question it didn't make sense for the user to have to "click" an additional button to move on. The system could have moved on without additional user input, offering the user (as it did) the option of "going back" if they chose to. There were numerous instances where the user had to self-initiate advancing to the next "page" when it wasn't necessary and didn't add anything to the course. Also, some of the videos seemed to be very superficial "interviews" providing little or no real content, so it didn't make sense to force the user to view them before proceeding with the course content.
- Nothing else. Very useful course.
- Honestly thank god for giving me a pdf to download this course had lots of information. Months or years down the road I will forget so its good I have a pdf download to refer to.
- I found the endless strings of letters as names for items rather annoying but that is not the course creator's problem.
- Combine the video with illustration at the same time
- I dont believe that this course, although interesting, had enough emphasis towards Property Managmement. It was pretty much aimed at Realtors.
- Great course...to the point. Most of the topics have been covered by our Managing Broker and we are kept up to date with Council changes.
- As a managing broker and compliance officer my knowledge of this topic was already fairly strong so I can't say that I strongly agree to most of the questions but the course was well constructed and a certainly valuable.
- Although I agree with trying to limit Anti-laundering in real estate, I do not think that it is prudent to have realtors, banks, mortgage brokers etc have to report suspicious activities and exclude legal professionals. It is my opinion that it would be more prudent to make the legal profession report suspicious activities as they are the ones filing in Land Titles and with the various gov't bodies.
- It would be nice if the videos didn't auto-play. I was using ear buds and had to scramble for them, then back up the video to restart it. (Or give some warning on the previous page).
- A Must have ! Extremely vital for a Licensee Thanks
- It was a great online course. amazing knowledge received. well structured.
- I was using safari as my browser at first and it seemed like there were a few things missing in some pages. I had to switch to a different computer altogether. I wish the presentation was complete no matter which browser was used as long as it is a current version of the browser.

- I really liked the videos
- Very well designed course.
- I am a strata property manager and do not deal in Real Estate Sales. I do not deal with money transactions. I found this course irrelevant to my industry.
- I would have benefited from receiving an email the day before my course started. I had a hard time finding a link to the course resources and one was not provided the day I received registration confirmation last month. Otherwise, it was simple enough and educational.
- When saving the study report references to my files I had difficulty returning to the modules and had to go back to the start page before getting back to where I had left off. It caused some frustration and anxiety so I elected to not save any others after the first few.
- It was an eye opener! Had no idea renovation/flips could be involved.
- Easy to complete from office at home. Prefer this method for future course requirements. Can access anytime very convenient.
- LAWYERS must be made to report if nothing else at least suspicions of criminal investment behavior.
- It was a good start. Peter German is an excellent source for information and he communicates well and has a strong presence in this area of expertise. We would do well to call upon such experts in the future, though we should also seek out Realtors who have both an understanding in our field and an understanding in the related field. Many Realtors have varied backgrounds they bring with them from their previous work. I have a Masters Degree in Criminology and spent almost 3 decades in law enforcement officer before becoming a fully engaged Realtor.
- this course is really helpful
- it was nice to see myself better educated on this issue
- Information in the course is very extensive and should be reviewed on going to be aware and any added info would be advisable
- Very interesting, I learned a lot and there were many things I was unaware of.
- All Good!
- I like the course materials and specifically appreciate the Module 6 Emerging Issues, which gives me a good heads-up.

- 2 areas of concern that weren't discussed, therefore aren't that clear are: 1) If we are submitting a STR, it's not up to us to just tell that client that we can't process with the deal is it? Do we continue to let them process with the deal? 2) If we submit a STR - is there not a chance that if that person is investigated, they may find out we submitted an STR - could they sue us, if we were incorrect and caused them hardship with the investigation.
- The course material was concise and well-delivered.
- As a licensed Rental and Strata Manager, this course did not feel like the best use of my time as there was no relevant or pressing requirements of my role within the industry. This material really applies to licensed Realtors above all others, but is being imposed upon all licensees. There was token mention of Strata and Rental Managers, but in the context of which profession within the industry represents the greatest liability to the reporting of money laundering activity, this course did not have any relevance to how my day to day operations are carried out. While this information was useful and timely given the recent findings in the province of British Columbia, and I certainly appreciate the RECBC's efforts to bring more relevant and current education into the licensing requirements for its licensees, I would respectfully like to ask that my licensing body pay closer attention to the differences between what a Realtor does in comparison to what a Strata and Rental Manager does as the roles are vastly different, and deserve individualized treatment. We are a very underrepresented and often misunderstood or ignored percentage of the overall body of licensees. I feel as though I am being penalized in unequal measure every time a Realtor takes action which results in a public relations uproar. It is at all times my desire to work and grow in an industry I cherish and have dedicated my career to; however, I do not feel my needs, efforts and overall position as a Rental and Strata Manager are acknowledged or supported under the RECBC's revised education and licensing criteria. This feedback is meant in honesty and not ill-will. I recognize there is a complex balance the RECBC is attempting to undertake, and at no time do I believe its efforts have been in poor taste or without merit. I am simply hoping to solicit positive support and further a dialogue from the RECBC, to better recognize and support the few of us who focus on and specialize in other areas of being an elected agent, not just those acting in property trading.
- Very good course. This course is well organised. Course should be free given it doesnt count towards the professional development hours credits. One doesn.t need to attend a course to understand the concept yet I am forced to pay for a course which offers no credit to my professional skill apart from better understanding on money laundering. which is only a reporting issue.
- Appreciate the reminder email a day before the course begins !
- The course was well organized and with information easily available. Past courses have not been user friendly and would be all over the place.
- There were too many videos. Maybe reduce those.

- I suggest the time window of 3 days should be increased to 7 Days.
- Yes, where can we get an example of a small / tiny brokerage Compliance Program template, to customize and implement.? Where at the RCMP do we contact for any money laundering reporting requirements.??
- no further comment
- I found **the second** hard to understand. Her pronunciation and cadence make listening and absorbing the material difficult.
- The registering and waitingf for 3 or 4 days to be able to start this sesion was very disagreable. It would be so much better to be able to register and start, this would have been so much better as life seems to chage and when i have time i would like to get onto these kind of projects.
- No
- It would be beneficial for Property Managers if there were a section that relates to how we can apply this information to residential and commercial tenancies.
- Excellent course !
- Helped a lot for understanding
- •
- Excellent and well presented. Thank you!
- Some of the videos were hard to follow because the speaker seem to be rambling on in technical language at some points.
- The first 3/4 of the Videos were a "good and workable" length...Balance of the Videos were a bit longer..and had more info to process......perhaps it is possible to have the video split into 2 parts...not sure if that would make sense or not.
- I learned a lot
- THANK YOU FOR YOUR SUPPORT
- In general, I find navigation of the site somewhat awkward. In addition, I am not fully comfortable with the fact that these regulations, in some respects, put licensees in the position of having to comment/deal with criminal related matters which should be left more to the appropriate authorities. Otherwise, it was a good opportunity to become more familiar with the issues surrounding potential money laundering activity as it relates to real estate transactions.

- Very good course! and well presented, easy to follow. Job well done.
- It took me a little time to figure out the steps once completing the first module to get to the second module. I feel that the important information could have been presented in a shorter form (summarized), taking less time and making it easier to learn the key points. I saved the links and references to my computer, however, I usually had to renavigate from the beginning of the module to get to where I left off. How do we know who the unregulated lenders are? Why have the lawyers managed to elude this responsibility and yet the notaries have to? References are made about large sums of cash used at the time of closing. We are not party to that part of the transaction. The lawyers and notaries are. Hence lawyers should definitely be part of the FINTRAC requirements. We often don't know exactly how much financing is arranged for as most buyers are preapproved. I leave the financing details with the Buyer and their lender. Thank you.
- The videos were informative, and well presented. They were a break from reading.
- I passed all the modules on this course and went all the way to the end and completed this course on March 23, 2020...which is one day before the deadline of March 24, 2020. Then I received an email from UBC saying I didn't complete my course and now have to re-register and pay again. Why? there is an obvious error on your system under grades and/or date of completion... at the end, it said i had finished this course and I had a check beside every single module. No grade though....instead it keeps on saying assessing...
- Well written course.
- Non
- The course was well structured. Some of the videos lost a little of their effectiveness because they occasional stopped mid-sentence and then restarted, maybe this is a buffering problem.
- It was useful and helpful course for me. Thank you.
- The navigation could be a bit more easier to use. Such as I have another window open if I wanted to check something from a previous chapter and such, I would have to close the window or the course material will NOT be accessible in a new window. I STRONGLY SUGGEST that you put that the course is in PFD form and can be downloaded on the TOP of the table of content. That will save me lots of trouble going back and forth trying to reference an earlier chapter and then losing my spot with my currently chapter. Thank you.
- The videos were painful to watch particularly the **sector** who's proficiency with the English language was questionable and I feel the use of that particular

ethnicity was questionable since we are already aware that the majority of the 'issues' we are experiencing came from the asian sector.

- I Never had any Money laundering clients or indicators in 28 years
- it would be nice if you could add a feature so that the whole course could be read to you like a podcast. otherwise, the videos are great. very informative.
- This course really provide the lawful information as well as the method to deter the anti-money laundering. Preferably more cases can be provided to learn.
- Now I understand that there are so many ways of money-laundring in our world. So, we have to watch out each transaction more carefully. Thanks.
- none
- fun course
- Is this a course we will have to take every 2 years? If so it will be a bit tiring. However, it will be good if we see from the newer courses every two years about any updates and changes to legislation and rules. It's also good to keep the examples local since this is for BC and it will really hit home more on how this affects us locally. Also, it was definitely informative for me but I wonder how it will be of use to the people who do this and will continue doing this and not care. Perhaps there could be a little bit more added component about how this laundering affects the greater society rather than just in the beginning part. I know people who won't care and will continue to launder because who would turn away clients? Also, there definitely needs to be more onus on other people involved in the real estate business such as mortgage brokers, lenders, or banks. I almost feel like it's not really in a realtor's place to ask where client's money is from. It's like if I went to buy a car, a sales person won't ask me where the money is from if I show up with cash. Just a straight fintrac maybe for over 10k.
- I think it would be good to explain better the steps involved and what to expect when you submit a suspicious transaction. What all is involved, does the client know that you reported them.
- I would like to continue to receive updates from RECBC/Fintrac about the progress of eliminating this problem.
- It is an awesome addition in an education for realtors. Thanks you
- I realize that this is a sincere attempt to educate and help fight money laundering activity, however I do not feel that I have been given very many useful tools by taking this course. My impression is that it is a slightly bureaucratic attempt at "making a difference". My thought is that it could have been done more succinctly. I am bothered that it took 3 1/2 hours of my attention and I had to pay out of my pocket for so little in the way of take away tools. I felt

too much subjective time taken with "talking heads". My impression was "who else from the office can we squeeze into this lesson to attempt flesh it out?". Three points I want to highlight: 1) the lesson referred to money launderers as "criminals", I wondered if that was technically a correct description if perhaps somebody was involved in the activity, but not yet tried and found to be guilty in our courts? 2) My partner was listening to the course as I took it, and her impression caused her to make the comment toward the end, "that is interesting they have taught you all the ways to money launder, but they have not given you much in terms of Realtors role in the matter". 3) Seems strange to that the legal profession is not included on the "team" obligated to report suspected money laundering whereas Notaries are? If one were intending to money launder in a real estate transaction, use a lawyer, not a Notary? Perhaps regulation should be considered to restrict conveyancing to Notaries only? On the bright side, it was well laid out and structured for learning, so points for that. I learned a bit about the international organization and the federal one. Keep working at it and it can become a more worthwhile use of time and expense. Thanks for letting me share my feedback! Stay healthy

- It would be nice if they didn't have to say "Thank you for watching this video" and other unnecessary things on each video because the videos are already very monotone and repetitive.
- I love the videos and would suggest adding more lecture videos. It sure beats reading.
- It is very important to improve my knowlege of the anti-money laundering regime and compliance obligations.
- NO.
- It could have been shorter. Perhaps a simple .pdf with the most common examples used in the course would be adequate. Overall, I found the course interesting.
- I found that the videos were not helpful. Presenters mostly just read the information verbatim only it took longer than it would if I were to read it. I am also a visual learner and I found that I didn't comprehend as well and ended up just muting each video and read the content instead. It was frankly, distracting and time consuming and didn't enhance the learning, for me. I would have liked a section talking about the anonymity of reporters, just to give assurances. Aside from the legal obligation to report, I'd like to hear that the criminals being reported will not know who reported them! Thanks, and the section talking about the anonymity of the section talk the criminal being reported will not know who reported them!
- When you click on the link in the video portion which takes you to a government website, I could not get back to the course. Had to log out and log back in to continue.
- Got More Knowledge About The Subject. Thank you.

- a well presented course
- Through the course as I was going through it, I kept thinking of the news I heard a few months back about how we in Canada do not have a money laundering body in our RSMP or judicial system. So where and who actually works on the people we report suspicious? Is our government serous about investigating? I personally haven't dealt with a suspicious transaction but have heard through the grapevine of people coming specifically from China and buying 10`12 houses at a time. And I am tired of speculation buying and using our housing market like the stock market and preventing young people from entering into our housing market. Most deterring legislation has been more cumbersome to Canadians that deterring the criminals. Just an opinion. The course is good and I definitely see value in doing our part but is it enough.
- I really enjoyed this course. The mixture of reading, small tests and videos kept me interested.
- I did feel this course pertained more to Real Estate Agents. There were some aspects that were helpful as a property manager.
- There were far too many acronyms and hard to follow. Thank you for offering such good educational services.
- No
- This is not a course that should be provided not helpful as the onus of proof is NOT on real estate professional.
- Fintract is the most important one during the real Estate transaction, all the realtors have to be focus on seriously.
- Great course content
- Thanks, great course glad it is mandatory, hope it helps decrease money laundering activity in our province plus weed off the unethical practices that are currently rampant in all aspects of the industry!
- I found this course to be very insightful and helpful for building the foundation of my real estate knowledge in Anti-Money Laundering in Real Estate. Taking his course helped build my confidence.
- Money Laundering has impacted the middle class working people very adversely by driving home prices out-of-reach. Money is still being laundered in a limited way by overseas entities through their Canadian friends and relatives. But the anti-laundering initiatives will help curb the loopholes for money launderers.
- Informative

- Pop-up windows are problematic! This can be implemented without pop-up windows. My background is I.T. Thank you
- I especially enjoyed Module 5 as it was very useful to work through with hands on examples that I could put to work on a day to day basis. To me there should have been more emphasis on that. I have been selling for 35 years in North Vancouver. I consider myself a very experienced Realtor. I suspect that people who were looking to money launder would seek out less experienced Realtors. However, I definitely learned a lot and will use this information moving forward. Fortunately our office does not accept cash deposits but that's clearly only one very example of ML techniques.
- Good course. I learned a lot of new things.
- Since I am 52 years old now, my eyesight is not as good as before, is that possible I can enlarge the contents of the on line course which would make them clearer and easier for me to read. Thanks
- I am a Strata Manager and would like more education in this feild rather than real estate
- The Check Your Knowledge questions throughout the modules and the Final Assessment are well-designed and balanced. Most importantly, providing Course PDF offers a valuable resource for students to review the knowledge during the course and in the future. Strongly recommend all the courses in the future have course PDF available (compared with NO PDF in Rule Changes-Agency and Disclosure--it is a big pity!).
- very good course and i learned alot and it was straightforward. Thank you!!
- The course explanation of the role realtors play and are able to contribute to anti-money laundering are grossly exaggerated and apparently misunderstood. We do not know what income our clients have, nor their history, resources, businesses, property they own, wealth, access to their bank accounts, family connections, inheritance, rarely know reasons for buying / selling, where funds originate. We do not know how many / type cars they drive, vacations they go on, boats, planes or assets they have. To be asked to investigate such things by the government is unethical. The course clearly states casinos are a major source of money laundering, yet there are few investigations, and few if any go to trial / prison. Who licenses and permits the casinos? whose land are they on? who sees the funds in real estate transactions? not the realtors except for a 5% deposit, 99% in bank draft! Provide a definition of "some kind of software" to acceptably verify identification documents - Who provides, pays for such verification and to what standard?
- Great Course, well laid out! Thank you

- Licensed for 30 years and work with my Licensed son. We are Realtors for 'high integrity' and have seen a thing or two in the industry over the decades. The course provided some examples of what we see in the market and filled in a blank or two for me. The criminal and political minds....so interesting! I remember when casinos first came into the province and those for said there would be no harm, only benefits. The negative said explained the potential harm and understood the 'cash positive' benefits. The politicians should have listened to the negative side and B.C. would be a better place today.
- Personally I prefer to attend live classes if available but the Video section of the on-line class was helpful.
- Overall it is a good experience.
- I could not DOWNLOAD the pdf for this course. Can I do it now? Thanks.
- some of the navigation was a bit tricky I had trouble downloading the manual but i think that was my fault ... anyway otherwise it was very well done and very useful information.
- This was the best Anti-Money laundering course that has ever been offered.
- none
- Having access to/showing the actual forms that we fill out to compliment the lessons.
- Good course
- please send me my letter of completion
- very well organized.
- I would like to hear more real examples.
- It's quite excited to know all so important updated rules and related regulations at this course.
- Complete was of time if you hold only a Strata Management license. RECBC continues to fall short on developing relevant education for Strata Management. This was again almost 100% for Trading services only, ridiculous how they force Strata Management to have to take this.
- This course is NOT applicable to Strata Property Managers and frankly was a waste of time to have to do. Read the room. Strata Managers have nothing to do with money other than the management of the strata corporation and paying their bills.

- I do not like the fact that you sign up for an online course (and pay for it instantly as you require) but yet you are not able to start the course at that moment, the start time is dictated by you which, defeats the purpose and convenience entirely. When I sign up for a course, the fact that it is entirely online based, I would expect that, I should have the ability to begin at that moment if I choose to do so. The 3 day window for completion could be triggered once you begin your course
- no
- No. Thank you!
- Appreciated the outline of how money laundering is attempted by buyers. Eyeopening. Good pacing and interactive involvement aided my integration of the information. Thanks for the course.
- No
- 1. The links to outside resources unintentionally signed me out of the course. It was not indicated that clicking on those resources would do so. 2. The portions that are intended to train the licensee to move from suspicion to belief money laundering need to address the normal commercial practices of those living abroad. In many cultures, it is normal to "criticize the government, hint at tax evasion, present large amounts of cash at the first meeting (intended to build credibility), and ask family members to be on title -i.e. children with a Canadian Visa." Canada is a Protestant country that practices corruption under a veneer of self righteousness. In contrast, other cultures may seem more "cynical". How do you prevent racism while remaining vigilant against money laundering?
- Great Course!!!
- this I store related to realtors and rental manager not strata managers.
- I just want to confirm that all my answers are: "strongly agree"... online courses are difficult to learn as I have distractions in my home where my main office is... the format of the course caused me to take extra attention, read and think about my answers... thank you
- Great course structure
- I would like to see more real cases.
- I really like the course the way it is designed.
- N/A
- Good course and solid outline of the material

- It would have been helpful to have the Money Laundering booklet come with the short course. That way I would be able to use it more. There should be a course on Fintrac
- I found the course informational and learned things I did not know before. Nevertheless, I don't feel this strongly applies to strata management.
- All good and it should be updated as per any rule change
- Not exactly necessary for REALTORS®Â This should be taken by th true culprits in money-laundering...Lawyers and Bankers! Real estate agents do not touch money!!
- Really kept me engaged. I like the short videos in combination with questions. Nice course!
- As a managing broker for a strata management ONLY brokerage, I find it bizarre that I am forced to take this course - I couldn't find anything in the material that related to strata management. While the course was excellent, and I trust will be great for the Trading professionals, please don't waste the time of professionals like myself doesn't apply to. Perhaps I'm wrong and missed where this course relates to Strata Management - if so, please advise.
- I still prefer taking courses in class where you are able to interact with the instructor.
- Very well put together course.
- No.
- No. thnaks
- I enjoyed this course very much. Very valuable.
- Thanks.
- No
- very good
- I appreciated a combination of video, text and quiz throughout. It wasn't an entire course of reading so it was more interactive and engaging which I believe to be more beneficial in the learning experience!
- Excellent course. Thank you.
- I find the subject difficult & too long.

- I felt that this course was directed at realtors (trading services) and wasn't necessary for Strata Management. If there was more information on how money laundering affected Strata Management and/or any requirements we would need to follow, I would find it more useful.
- No.
- Very informative information presented in a user-friendly manner. I liked the embedded videos and the different commentators. Thank you.
- Very Helpful Thanks!
- great education
- I am a Strata Manager and it would have been helpful since it was are requirement for me to take this, that you provide specific situations related to Strata Management.
- Well done, thanks!
- no
- The format is easy to understand and follow.
- When making new videos, you don't need to intro each video nor say "you can now proceed with the next module" on every module.
- no
- Speakers with monotone voices makes the presentation less exciting and more boring.
- Nothing
- great course, in section five and six there was a bit of a problem with two of the videos, they would stop playing for about 30 sec and start again.
- Very informative and easy to follow and use
- Thank you for the great course, very well organized with great background to showcase the licensee how to work more professionally to protect our business, our brokerage and ourselves.
- no
- Its taken more hours in phones calls to figure out all the courses we need to take and where to login than the actual course

- As a strata manager I have not experienced any of these scenarios. There was
 only one sentence which referred to a strata complex. I am uncertain if I ever will
 as we live in a very small town. Perhaps some of the strata managers in larger
 cities would be subject to some of these issues. I am however aware if a
 situation did arise.
- more case study would be helpful
- Some real life examples, court cases are needed in the material.
- Some functions on the online module are disabled. Unable to download a pdf course Manuel for future reference.
- What a waste of time. There is no money laundering in Real Estate, only in government.
- I am a strata manager so this does not relate to my job as much as it does with a Real Estate Agent however I did find it interesting.
- It was a very beneficial course. Thank you!
- This course provides very valuable information and is in a good format. My only "improvement suggestion" would be to offer the videos in a format that you can "pause" and then carry on. Even though the PDF notes are available, for those of us who want to write additional notes, the current format is a wee bit frustrating. Otherwise, a great course! Thank you so much.
- I am a strata property manager and found that nothing in the course is applicable to my profession. The course applies to trading, so from a professional perspective this course was interesting, but is not applicable and does not help improve the way I do business.
- I know of anti-money laundering and how to deal with it in my practices.
- The course covered a lot of ground in a short period of time and gave an excellent oversight into the Anti-Money Laundering problem in B.C.
- more updates as we are all new to this.
- Very interesting material even the implications in this matter by a strata property manager is limited
- I went to 5 different devices to navigate the videos! A complete waste of my time and money.
- Good thing of this online course is : on your own pace to complete .:)
- well done and very informative

• want to see more examples and scenarios in the component.