

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Steven Beeksma, with a business address of 2940 Virtual Way, Vancouver, BC, V5M 0A6, Anti-Money Laundering Programs Specialist for British Columbia Lottery Corporation, AFFIRM THAT:

1. I am an Anti-Money Laundering (“AML”) Programs Specialist employed by the British Columbia Lottery Corporation (“BCLC”), and as such, have personal knowledge of the facts and matters in this affidavit. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of that information and belief. I believe that all of the information in this affidavit is true.
2. I affirm this affidavit to provide evidence to the Commission pursuant to a summons issued to me pursuant to the *Public Inquiry Act*, SBC 2007, c. 9.

I. Work History within the Gaming Industry

3. I was hired by Great Canadian Gaming Corporation (“GCGC”) in October of 2000. I was initially assigned to work as a security officer at what was then known as the Richmond Casino.
4. After three to four months of working as a security officer at the Richmond Casino, I began to be occasionally assigned work as a surveillance operator at the Richmond Casino. After approximately two months of occasional work as a surveillance operator, I began to work full-time as a surveillance operator at the Richmond Casino. At the time, security and surveillance were a single unit.

5. I cannot recall the precise dates, but I was eventually transferred to the Renaissance Casino in Vancouver, where I worked as a surveillance supervisor for a number of weeks. I was then transferred to the Holiday Inn Casino in Vancouver, where I continued to work as a surveillance supervisor.
6. In 2003, I became the Assistant Manager of Surveillance at the Holiday Inn Casino. I remained in this position for a little less than a year.
7. In approximately May 2004, I became a surveillance shift manager at what would become and is currently known as the River Rock Casino in Richmond.
8. I left GCGC in December 2008 when I was hired as a casino investigator by BCLC.
9. Prior to being hired as a casino investigator by BCLC, I had applied for positions within BCLC's compliance department. I had applied for compliance positions instead of investigator positions because I understood that law enforcement experience was required to become an investigator.
10. Once Doug Morrison was hired as Manager of Casino Security and Surveillance at BCLC, I saw that he began hiring investigators with more diverse backgrounds, including two of my former GCGC colleagues, Stone Lee and David Slobodian.
11. Mr. Lee encouraged me to apply for an investigator position and I understand that he spoke to Mr. Morrison about my candidacy. I was hired as a BCLC casino investigator in December 2008.
12. After three to four months spent learning the role of a BCLC casino investigator, I was assigned to work as an investigator at Starlight Casino. A year later, in 2010, I was moved to River Rock, where I worked as an investigator until January 2019.
13. In 2016, BCLC expanded its AML Unit and I continued to work as an investigator as part of this new unit, with a new title of AML Investigator.
14. In January 2019, I became an AML Programs Specialist within BCLC's AML Unit, which is similar to the role of an assistant manager.

II. Experience at Richmond Casino as part of GCGC Security and Surveillance

15. In my affidavit, I will refer to “loan sharks”. When I use this term, I am referring to a person whose primary purpose in attending a casino is suspected to be to facilitate cash and/or chips to players who require access to cash and/or chips in order to continue gaming, as well as who display the typical characteristics of suspected loan sharks, such as loitering without engaging in gaming activities or passing chips and/or cash to players. While I would not know what rate of interest was being charged by a suspected loan shark (or if interest was being charged at all), in my view an interest rate is what differentiates a person lending cash and/or chips to someone as a favour from a person lending cash and/or chips to someone as a business.
16. I suspected that loan sharks were operating at the Richmond Casino. It was not a big casino, so suspected loan sharks were relatively easy to identify. Security and especially surveillance staff, such as myself, were very aware of the presence of suspected loan sharks, in part because we had access to and reviewed video footage from the casino floor. To the best of my recollection, I would typically observe one or two suspected loan sharks at the Richmond Casino on most days.
17. I am not sure how aware other casino staff were about the presence of suspected loan sharks – dealers may or may not have been aware, but I believe that those who understood the language spoken by the suspected loan sharks would likely have known what was going on.
18. Many of the suspected loan sharks who frequented the Richmond Casino were young Asian women. This was not the type of person I expected to be working as a loan shark.
19. The amounts I understood were being loaned by these suspected loan sharks, based on my observations of the dollar amounts of related cash buy-ins, were relatively modest compared to the amounts of cash that I suspected were being loaned to players in later years. During this period of time, I understood that amounts ranging from \$500 to \$20,000 were being loaned to players by suspected loan sharks.

20. The suspected loan sharks were a manageable problem, though the Richmond Casino's approach to dealing with them changed frequently. Initially, I understood the approach to be that it was better to know who the suspected loan sharks were and to try and keep them in line – because if one was removed from the casino, they would quickly be replaced by someone that we had not seen before and did not know. I understood this to be the casino's approach based on my observations of how my shift supervisors and managers dealt with suspected loan sharks. There was no explicit direction from the casino regarding this approach – it was instead my general understanding based on what I observed.
21. When I was working in surveillance, I would report my observations regarding suspected loan sharks to my shift supervisors, and it would be up to them to decide whether to escalate the matter any further. I do not know whether my observations were necessarily escalated in each instance – I would simply provide my shift supervisor with my observations regarding suspected loan sharks and assumed that this information was being assessed and escalated as appropriate. I do not remember all of my shift supervisors from this time, but some names that I remember include Stone Lee, Mike Smith, Dave Pacey, Rob Webb, Milan Bajic, Wayne Thompson, Vlada, Ranko, and Ariel.
22. Eventually, within the first two years that I was with GCGC at the Richmond Casino, a direction came down that we were to remove suspected loan sharks. I remember being told at times that we would be removing suspected loan sharks that day, and that we if saw a suspected loan shark passing cash or chips three times, we were to notify our shift supervisors, and the suspected loan shark would then be removed from the casino. I do not know who gave this direction, but I believe it was someone above the level of my shift supervisors within GCGC.
23. When suspected loan sharks were removed from the casino, I understood that they were also banned from attending the casino for one year, as I would often see print outs of these individuals posted in the security and surveillance office, indicating that they had been banned. It was not, however, uncommon for a suspected loan shark who had been removed from the casino to be replaced by someone new within an hour. I would often

observe, in such a scenario, a new individual whom I did not recognize and who exhibited several of the characteristics of a suspected loan shark, as described above.

24. I recall only one incident of violence involving suspected loan sharks during my time at the Richmond Casino, which was a fight that I believe to have been part of a turf war between suspected loan sharks.
25. I was never given the impression that GCGC viewed loan sharks as being good for business. While people I worked with occasionally made such suggestions, no one with any authority within GCGC ever did.

III. Experience at River Rock as part of GCGC Security and Surveillance (2004-2008)

26. When River Rock first opened in July 2004, I was one of four surveillance shift managers. As a surveillance shift manager, I would oversee ten-hour shifts in surveillance. Staff under my supervision were assigned to one particular area of the casino, such as slots or table games, to monitor activity.
27. At this time, members of the surveillance unit were responsible for processing large cash transaction reports ("LCTRs"). I would review reports, organize the corresponding paperwork, and enter the reports into the system. As a surveillance shift manager, I would also deal with bigger issues as they came up and help my staff where they needed it. I would also work with BCLC casino investigators, who worked on site at River Rock, reviewing surveillance footage with them. At this time, the BCLC casino investigators I worked with at River Rock were John Karlovcec and Gordon Friesen, who were later joined by Don Merkel at some point between 2004 and 2008.
28. When River Rock first opened in July 2004, the problematic activity at that time was mainly cash and chips being passed to players by suspected loan sharks. I noticed a significant increase in the number of individuals that I suspected were working as loan sharks compared to the number of such individuals at the Richmond Casino. This observation was based on my seeing a greater number of individuals engaging in the behaviours characteristic of a suspected loan shark, as described above. The suspected loan sharks I saw at River Rock when it first opened included some of the suspected loan

sharks I had seen at the Richmond Casino, but also included people like [REDACTED] who seemed to be higher up the food chain.

29. It is difficult for me to say how much of an organized crime presence there was at River Rock at that time. GCGC employees working at River Rock, myself included, made assumptions about who might be involved in organized crime, but we wouldn't know with any certainty unless law enforcement identified them to us. For example, I remember one instance in November 2007 when law enforcement attended River Rock's surveillance room in order to live monitor individuals they told us were involved in organized crime. Attached and marked as **Exhibit "A"** (BCLC0016491) to this affidavit is a true copy of an incident report detailing this occurrence.
30. There was a period of time when members of criminal organizations started coming to River Rock wearing clothing or jewellery that indicated their gang affiliations. Security staff eventually warned those individuals that they could attend the casino but that they could not "advertise". This issue would be handled very differently today. Today, details about the suspected gang member would be sent to a BCLC analyst who would conduct an investigation and attempt to ascertain whether the individual is involved in organized criminal activity. In instances where BCLC analysts are unable to confirm a suspect's criminality, BCLC may also request an assessment from the Joint Illegal Gaming Investigation Team's ("JIGIT") Gaming Intelligence Unit ("GIU"). Where BCLC considers it to be justified, the individual would be banned under a public safety barring or AML extreme risk barring for the maximum allowable period of five years.

IV. Experience Regarding Presence of Law Enforcement and BCLC and GPEB Investigators as part of GCGC Security and Surveillance (2000-2008)

31. I do not recall seeing BCLC or Gaming Policy and Enforcement Branch ("GPEB") investigators in GCGC's casinos during my first two years working for GCGC at the Richmond Casino. I do, however, remember seeing BCLC operations managers on site at GCGC's casinos within the first two years of my tenure with GCGC. Once River Rock opened in July 2004, I began working with BCLC casino investigators assigned to River Rock.

32. Two BCLC casino investigators, Gordon Friesen and John Karlovcec, started working on site at River Rock after it opened in July 2004. I felt that there was a strong working relationship between River Rock surveillance and BCLC casino investigators at that time. It appeared as though the BCLC casino investigators were scheduled to be at River Rock on a full-time basis and were on site almost every day – it was their home base. Based on my observations, they would follow up and make further inquiries about incidents that were reported to them in iTrak.
33. In response to the presence of suspected loan sharks and the cash and chip passing that was occurring when River Rock first opened, there was a blitz of efforts by BCLC casino investigators to get these people out of the casino. The measures BCLC casino investigators took were very aggressive, with people being removed from the casino for even passing a few chips to a friend. Most of these individuals would end up banned from the casino as well, which I could see had occurred when I was reviewing subject profiles in iTrak. For example, iTrak allows a user to filter subject profiles according to whether there have been any changes to the profile in the last 24 hours. I would typically come in and review such subject profiles and could see that a particular person had been banned for chip passing.
34. GPEB investigators were also occasionally on site once River Rock opened, but far less often than BCLC casino investigators. Rick Larson was the GPEB investigator assigned to River Rock at that time.
35. Prior to the opening of River Rock in July 2004, I did not interact with law enforcement while working for GCGC. I do not recall seeing law enforcement officers in GCGC's casinos on a regular basis at this time, but I believe that they did occasional walk-throughs. Once River Rock opened, I would see law enforcement on site sporadically, typically when they were looking for a specific person, but not often.

V. Experience as a BCLC Investigator (Casino Investigator: December 2008 to April 2016; AML Investigator: April 2016 to January 2019)

36. Becoming a casino investigator at BCLC came with a small increase in salary, a company car, bonuses, benefits, and a pension.
37. When I first started as a casino investigator in December 2008, I was given a policy manual to review, and then began going from site to site, including frequent visits to Grand Villa Casino.
38. As a BCLC casino investigator, I investigated everything that occurred in casinos, from suspected service provider breaches of BCLC policies to suspected criminal activity such as, but not limited to, cheat at play, assault, or theft. On a day-to-day basis, BCLC casino investigators who were not assigned to a particular site would arrive at BCLC's offices, review the incidents from the previous day, and assign ourselves incidents to follow up on with the sites. We would then attend the sites, review the surveillance video footage, assess whether sufficient video footage had been saved (sometimes requesting that additional video footage be saved so as to provide a more complete picture of the incident) and speak to casino staff who were involved in the incident.
39. After three to four months of learning the role of a BCLC casino investigator, I was assigned to Starlight, where I remained for a year. I worked with John Karlovcec for about half of the year I spent at Starlight. In mid-2010, I was assigned to River Rock, where I remained until January 2019.
40. The main difference between my role with GCGC and my role with BCLC was the province-wide view of gaming that I had as a casino investigator with BCLC. As a BCLC casino investigator, I could see a player's activity across the province through a casino reporting system (iTrak) and could make a recommendation for a province-wide, not just site-specific ban, to be imposed.

a) Experience as a BCLC Casino Investigator at Starlight

41. I remember an incident in May 2010 in which a player, Yu Zhang, cashed out \$1.2 million in chips. I remember that it was clear that they were his chips. He asked the casino for a letter stating that the cash he received was casino winnings, which he said he needed to present at the airport. Starlight issued the letter and BCLC became aware of this incident after the letter had been issued by the casino. BCLC investigated the incident and instructed Starlight that they should not have issued the letter. Attached and marked as **Exhibit “B”** (BCLC0016352) to this affidavit is a true copy of the iTrak incident report which describes this incident.
42. I do not know what repercussions Starlight faced but I remember that the Director of Compliance, Glenn Atchison, was concerned that he was being “thrown under the bus”. I believe Mr. Atchison is still with Gateway Casinos and Entertainment, which is BCLC’s “service provider” at Starlight. A service provider is a private sector entity with which BCLC enters into a service agreement for administering and carrying on the day-to-day operations of gaming facilities.

b) Experience as a BCLC Investigator at River Rock (Casino Investigator: mid-2010 to April 2016; AML Investigator: April 2016 to January 2019)

43. When I was working as a BCLC investigator at River Rock, I would spend the entirety of my shifts at the casino. My hours were flexible and could vary – as long as I put in my hours, I could come in early or late or on the weekend. Typically, there would not be an investigator on site late at night or early in the morning.
44. I did not see my work schedule as a BCLC investigator as an impediment to me performing my job. BCLC investigators were not in the casinos to arrest people or to intervene in situations – those were the jobs of law enforcement and casino security, respectively. My role as a BCLC investigator was in part reactive, responding to reports submitted by casino staff, and in part proactive, initiating investigations based on my own observations, review of records, and inquiries with service provider staff.

45. I remember an incident in May 2010 in which a patron entered River Rock with \$460,000 in cash. In 2010, my memory is that a cash buy-in in the \$400,000 range was significant and out of step with what was the norm in casinos at the time. At that time, a \$100,000 cash buy-in was significant, so a cash buy-in in the \$400,000 range really stood out.
46. Mike Hiller was one of the BCLC casino investigators assigned to River Rock with me at the time and was the one who initiated BCLC's investigation into this incident.
47. I remember that River Rock surveillance did not plan to report the transaction as suspicious, and that Mr. Hiller had a heated argument with River Rock's surveillance manager, Dave Pacey. This led to Mr. Pacey submitting an iTrak incident report to BCLC, as well as a s. 86 report to GPEB which indicated that he was doing so because BCLC thought the transaction was suspicious. Attached and marked as **Exhibit "C"** (BCLC0015835, BCLC0015836) to this affidavit is a true copy of correspondence, on which I was copied, from Mr. Hiller to Mr. Pacey, which in turn attaches Mr. Pacey's s. 86 report to GPEB regarding this incident.
48. It was standard practice for incidents like this to be reported to GPEB via a s. 86 report and to the Integrated Proceeds of Crime ("IPOC") or, once IPOC was disbanded, with the Criminal Intelligence Service British Columbia/Yukon Territory ("CISBC/YT") and JIGIT. Information about these types of incidents was therefore available to GPEB and law enforcement, should these organizations have wanted to investigate further. As of the end of January 2020, BCLC no longer reports such information to CISBC/YT. BCLC now only shares information about these types of incidents with GPEB and JIGIT.
49. It was not part of our role as BCLC casino investigators to telephone law enforcement about incidents like this as they were occurring. In most cases, we would not know about a transaction until after it had occurred and would therefore not be in a position to inform law enforcement as it was happening.
50. I recall that this was the incident that made BCLC, as well as other stakeholders such as GPEB and service providers, start to take a second look at what more could be done about the volume of cash coming into casinos. This was, to the best of my recollection,

the beginning of the period in which significant amounts of cash began entering the casinos. At River Rock, a cash buy-in for \$400,000 became a much more common occurrence in the years that followed this incident, with the volume of cash buy-ins peaking in 2014-2015. To the best of my recollection, at their peak cash, buy-ins in the range of \$100,000 to \$200,000 were fairly common in the high limit rooms at River Rock, and some cash buy-ins could be as high as in the range of \$800,000 in the high limit rooms at River Rock. \$20 bills were the most common denomination for these cash buy-ins. Attached and marked as **Exhibits “D”** (GCGC126) and **“E”** (BCLC0015379) to this affidavit are true copies of iTrak incident reports which provide examples of transactions within this dollar range.

51. The BCLC investigators’ office at River Rock is equipped with a direct video feed of the casino surveillance system, which can be live monitored by BCLC investigators. BCLC investigators could and sometimes would observe cash buy-ins as they occurred in a private room next to the cash cage, which was used to provide privacy for large cash buy-ins. At the time, I understood that it was not our role as investigators to intervene. We were clearly told (in a 2012 meeting with Terry Towns, BCLC’s Vice President of Corporate Security and Compliance, discussed below) that it was not our job to intervene but to observe and report. We had no role in deciding whether cash buy-ins should be accepted. We would observe transactions, review iTrak for incident reports filed by the service provider, conduct investigations, file a Suspicious Transaction Report (“STR”) with the Financial Transactions and Reports Analysis Centre of Canada (“FINTRAC”) if warranted, and then share the content of the STR with GPEB and law enforcement.
52. I viewed the large cash buy-ins that involved significant numbers of \$20 bills and that resulted in STRs being filed as suspicious. It seemed likely to me that these funds were from questionable sources, because I could think of few legitimate explanations for why someone would have so many \$20 bills – that’s why BCLC investigators were filing STRs and banning players. I shared my views regarding the suspicious nature of these transactions during our monthly BCLC casino investigator meetings, as well as during our regular police working group meetings.

53. Prior to 2015, bans were imposed on players on a case-by-case basis. A large cash buy-in, in and of itself, was not enough to justify a ban. In many cases, the deciding factor was whether the player put their money at risk. If a player bought in and immediately cashed out without playing, they would be banned. If a player bought in, put their money at risk, and lost it all, this was not seen as money laundering because such a player would be leaving the casino without having converted their funds – instead, they would be leaving empty handed. I cannot say whether Terry Towns communicated this view to me directly or whether I was informed by someone else that this was a view Mr. Towns had communicated to them, but I understood this to be Mr. Towns' position, as well as the general attitude of BCLC management at the time.
54. The BCLC casino investigations unit had monthly meetings that included both investigators and managers. At each meeting, there would be a round table discussion and the volume of cash coming into casinos was a frequent topic of conversation. Mike Hiller was very vocal about this issue and played a role in changing the outlook of the casino investigations unit. For example, Mr. Hiller would attempt to highlight that, even though a player had lost the money they had come in with and therefore not laundered money in the traditional sense, the money they bought in with could have possibly been the proceeds of crime.
55. BCLC's initial strategy to address the volume of cash coming into casinos was to try to learn more about the players. This strategy was established by the AML Unit upon its initial development in 2013 and was communicated at our monthly investigator meetings and regular police working group meetings. BCLC had also hired an analyst in order to assist in carrying out this strategy.
56. I believe the thinking was that if BCLC could learn about the players, it would be possible to verify whether they had legitimate sources of wealth to play at such high levels. At the time, if someone had a legitimate source of wealth to play at the level they were playing at, it was less of a concern. This was because, in combination with a determination that a person was not involved in criminal activity, establishing that an

individual had a legitimate source of wealth to play at a high level suggested it was plausible that the player's funds were legitimate and not from a questionable source.

57. While players' source of wealth was a concern at this time, the source of the players' cash was less of a concern. I felt that the attitude of BCLC's management was that unless we had conclusive information from law enforcement confirming that cash from a specific individual was suspicious, the casinos could accept it. I believe the thought process of BCLC's management was that if reports were going to GPEB and to law enforcement, and if they were not taking any action to address what was contained in the reports, then why should the cash not be accepted?
58. Again, I cannot say whether Terry Towns communicated this view to me directly or whether I was informed by someone else that this was a view Mr. Towns had communicated to them, but I understood this to be Mr. Towns' position, as well as the general attitude of BCLC management at the time. I was never, however, directed by anyone at BCLC not to take certain actions that would interfere with revenue generation.
59. I had a very good relationship with Rob Barber and Ken Ackles, who were the two GPEB investigators assigned to River Rock. I knew from regular meetings with them that they shared my concerns about the volume of cash coming into casinos. Mr. Barber in particular was very vocal about the issue and seemed frustrated by the lack of action being taken. Mr. Barber told me that he wrote a letter or a report of some kind to that effect, and that he had sent it up the food chain at GPEB. Mr. Barber indicated to me during our conversation that he did not have much faith that his letter or report would get to where he wanted it to go.
60. The attitudes of GCGC surveillance staff at this time were split – some viewed the volume of cash coming into casinos as inherently suspicious, while others did not. While not directly involved in these conversations, I understand that GPEB and GCGC discussed establishing a clear dollar value threshold above which service providers were required to report as suspicious any cash buy-ins above this threshold. Attached and marked as **Exhibit "F"** (page 7 of BCL0008832) to this affidavit is a true copy of correspondence in this regard.

c) Experience with Ross Alderson as a BCLC Investigator at River Rock

61. As explained above, it was made clear to us as BCLC investigators that our job was to observe and report, recommend barrings where warranted, but not to intervene with respect to the activities of high limit players on the gaming floor. I remember, however, two incidents in which Ross Alderson, a BCLC casino investigator, intervened with respect to players.
62. I remember an incident in 2012 when Stone Lee, Ross Alderson, and I were BCLC casino investigators assigned to River Rock. Mr. Alderson had recently joined the casino investigations team after having worked on the lottery side of BCLC and was therefore not familiar with how casinos worked. Mr. Alderson interviewed two women due to concerns about their activity. Attached and marked as **Exhibit "G"** (BCLC0016492) to this affidavit is a true copy of the iTrak incident report which relates to this incident.
63. While there was no specific direction from BCLC not to interview players, this was not something I had ever seen a BCLC casino investigator do before. As players became increasingly valuable clientele, I could see that River Rock staff really catered to them in order to ensure they had a positive experience. The thought of a BCLC investigator approaching a VIP player on the floor was therefore unthinkable and was not something I had ever even considered at that point in time.
64. I also remember another incident that occurred shortly after in 2012. This incident involved Mr. Alderson directing River Rock staff to pay out a player in \$20 bills due to concerns about the player's activity. Attached and marked as **Exhibits "H"** (BCLC0016470), **"I"** (BCLC0016471), and **"J"** (BCLC0016472) to this affidavit are true copies of three iTrak incident reports which relate to this incident.
65. Again, while there was no specific direction from BCLC not to direct service providers in this way, this was not something I had ever seen a BCLC casino investigator do before. Service provider staff managed the day-to-day operations of the casino and they were not BCLC employees – as such it would have been unusual for a BCLC employee to give directions to service provider staff.

66. During the next regularly scheduled monthly investigator meeting, Gordon Friesen escorted Mr. Alderson, Mr. Lee, and myself to Terry Towns' office. Mr. Towns was there with Bryan Hodgkin. Mr. Towns first told Mr. Friesen, Mr. Alderson, Mr. Lee, and myself, with Mr. Hodgkin present, that we were being too aggressive about chip passing investigations and said that two friends giving each other chips was not a big deal. Near the end of our meeting, Mr. Towns also told us that we needed to stop speaking to players – he told us that we were not law enforcement and that it was not our job to speak to players. I specifically remember Mr. Towns telling us to “cut that shit out”. He never told us that it was not our job to investigate money laundering.
67. I do not know how Mr. Towns became aware of Mr. Alderson's interventions with respect to players, but I assume that the information was reported up within GCGC by Rick Duff, General Manager of River Rock, that it made its way over to someone at the senior level within BCLC, and then down to Mr. Towns. BCLC's Chief Executive Officer at the time was Michael Graydon.

d) Knowledge of Paul Jin as a BCLC Investigator at River Rock

68. Paul Jin was a suspected loan shark whom I first became aware of sometime in 2011-2012. He was known to gamble on occasion, but would usually just pull up to the casino to deliver cash to players. BCLC investigators would see this happen when reviewing surveillance video footage and discover what had happened. By that time, of course, the casino would have already accepted the cash buy-in.
69. Once BCLC realized what was happening, Mr. Jin was banned for a year in September 2012, based on a recommendation made by Stone Lee. I understand from a conversation I had with Mr. Lee that he had recommended a longer ban, but that, following review by John Karlovcec, a one-year ban was approved. I remember that Mr. Jin was, however, just as active after he had been banned, and we learned that he was continuing to make cash drop-offs at River Rock. About a month after Mr. Jin was first banned, I learned that Mike Hiller recommended that his ban be increased to five years as a result of an incident that had occurred at Starlight and that a five-year ban was subsequently approved. I cannot remember specifically how I learned about Mr. Jin's five-year ban, but Mr. Jin

was a high-profile player and his being banned would have been a topic of conversation among investigators. I would have also likely noted the change to his subject profile in iTrak. Attached and marked as **Exhibits “K”** (BCL0016493) and **“L”** (BCLC0011149) to this affidavit are true copies of the iTrak incident reports regarding these two barrings.

70. It was suspected by casino surveillance and BCLC casino investigators that Mr. Jin and his associates nevertheless continued to make cash drop-offs at various BCLC casinos. Players buying in with cash delivered by Mr. Jin and/or his associates were not automatically banned. They were, however, eventually targeted in BCLC’s first round of imposing cash conditions and were required to participate in interviews with BCLC’s AML investigators.
 71. Like Mr. Jin, identified members of his network are on five-year bans that are automatically reviewed for renewal when they are about to expire. To my knowledge, neither Mr. Jin nor his known associates are currently active around casinos.
 72. In October 2016, BCLC implemented a directive to all service providers to refuse suspicious cash buy-ins that were identified in real time. Attached and marked as **Exhibit “M”** (BCLC0000117) to this affidavit is a true copy of the directive implemented by BCLC.
- e) Experience with Cash Conditions Program, Player Interviews, and Source of Funds Declarations as a BCLC Investigator at River Rock
73. BCLC formally introduced its cash conditions program in August 2015. Comments would be placed on certain subject profiles in iTrak identifying them as now being on cash conditions – which meant that they could not buy-in with unsourced cash or chips – and requiring that they participate in an interview with BCLC investigators before they would be allowed to buy-in again. Attached and marked as **Exhibits “N”** (GCGC110) and **“O”** (GCGC109) to this affidavit are true copies of a cover letter from BCLC regarding BCLC’s Investigations Protocol for Educating, Warning, Sanctioning, or Barring Patrons (the “Protocol”), as well as the Protocol itself. Attached and marked as **Exhibits “P”** (BCLC00001053, BCLC00001054) and **“Q”** (BCLC0007898,

BCLC0007899, BCLC0007900) to this affidavit are true copies of correspondence regarding the formal introduction of BCLC's cash conditions program.

74. The interviews with these players were conducted in person. Because Stone Lee speaks Mandarin, he would conduct most of the interviews and translate for me, while I would take notes. The interviews were not recorded, but I created summaries of the information we obtained based on my notes and further information provided by Mr. Lee. The interviews often focused on specific incidents. Attached and marked as **Exhibits "R"** (BCLC0016460), **"S"** (BCLC0009514), **"T"** (BCLC0009492), **"U"** (BCLC0009573), **"V"** (BCLC0009624), **"W"** (BCLC0009564), **"X"** (BCLC00012973), **"Y"** (BCLC0009594), **"Z"** (BCLC00012981), **"AA"** (BCLC0009622), and **"BB"** (BCLC00012985) to this affidavit are true copies of a selection of player interview summaries that I prepared.
75. As previously mentioned, BCLC's AML Unit targeted players suspected of receiving cash from Mr. Jin at the beginning of BCLC's cash conditions program and they were asked about the nature of their dealings with Mr. Jin during their interviews. While it was not clear to us whether interest was being charged by Mr. Jin in respect of all of his customers, during these interviews we were often told that higher-level borrowers were not being charged interest. We were also told by some players interviewed that the funds they were borrowing from Mr. Jin were later repaid in China. This was the first time that I understood that this was how funds were being acquired and repaid by Mr. Jin's customers.
76. I remember one player we interviewed who described Mr. Jin as his friend. The player was a Chinese national who had no way of accessing money in Canada. He saw Mr. Jin as another businessman who helped him out by providing him with access to money in Canada. He did not see Mr. Jin as a criminal. See **Exhibit "R"**.
77. When BCLC began taking more aggressive action to address the volume of cash coming into casinos, including by instituting its cash conditions program and banning players, there were a number of different effects. One was that there was a decline in the number of large cash buy-ins, which resulted in a decline in the number of STRs filed by BCLC.

78. Another was a growing concern about underground casinos. The first wave of players who were put on cash conditions in 2015 included some of the top players in the province, based on a combination of the size of their buy-ins and the frequency of their play. Even though they had cash conditions imposed on them by BCLC, they still wanted to gamble. It is my understanding that service providers began to hear from players about the existence of illegal underground casinos. This understanding is based on casual conversations I had with River Rock staff while working on site, when dealers or dealer supervisors would, for example, indicate that they had overheard a player talking about a new casino that was operating somewhere in Richmond.
79. BCLC investigators began incorporating questions about underground casinos into their interviews, asking players about them and educating them about the safety risks that they presented. We began asking these kinds of questions in order to gather intelligence that might be of assistance to JIGIT in locating illegal casinos and I was told by Daryl Tottenham that he shared relevant information with JIGIT.
80. I came to suspect that underground casinos were recruiting dealers from legal casinos. This made sense to me, as the underground casinos would want competent dealers who were already known to players. I remember, after a raid of an illegal casino in which GPEB was involved, Rob Barber gave me a list of names taken from what looked to be a schedule. I was able to identify some individuals who may have been legal casino employees at the time, but was unable identify legal casino employees with any certainty as the list contained first names or nicknames. I would have shared any possible matches with GPEB, but I do not know what became of this information – I did not hear anything back from GPEB.
81. Some of the players who were placed on cash conditions and interviewed by BCLC investigators continued to play at the legal casinos. I remember, however, one player telling me in an interview that he would no longer be able to play because he did not have a bank account in Canada. A year later, this player opened a PGF account and in a subsequent interview said that his accountant had found a way for him to open a bank account in Canada. See **Exhibit “S”**.

82. Source of funds declarations were required for all buy-ins of \$10,000 or more as of January 10, 2018, following the release of the Dr. Peter German's interim recommendations. BCLC imposed a further requirement of same-day receipting for all buy-ins of \$10,000 or more. Attached and marked as **Exhibit "CC"** (BCLC0005526) to this affidavit is a true copy of this directive.
83. I believe that this combination of requirements has had a significant impact on the volume of cash coming into casinos – it has all but eliminated large cash buy-ins as a concern for BCLC. Players are no longer coming in with \$200,000 in cash. As a result, the types of suspicious transactions BCLC investigators are dealing with now are in the \$9,000 range, due to the source of funds threshold having been set at \$10,000. Attached and marked as **Exhibits "DD"** (BCLC0015875), **"EE"** (BCLC0015881), **"FF"** (BCLC0015890), **"GG"** (BCLC0016421), **"HH"** (BCLC0016422), **"II"** (BCLC0016423), **"JJ"** (BCLC0016424), **"KK"** (BCLC0016425), **"LL"** (BCLC0016426), **"MM"** (BCLC0016427), **"NN"** (BCLC0016428), **"OO"** (BCLC0016430), **"PP"** (BCLC00016431), and **"QQ"** (BCLC0016446) to this affidavit are several iTrak incident reports regarding these types of transactions.

VI. Experience within BCLC's AML Unit

84. In April 2016, BCLC expanded its AML Unit to include several investigators and an administrator. I received a phone call from my manager, Kris Gade, and assistant manager, Bruno Gatto, and was told that, effective immediately, I would be reporting to Daryl Tottenham, Manager of AML Programs, within the AML Unit.
85. On January 21, 2019, I took on my current role as AML Programs Specialist, which is akin to an assistant manager position. In this role, I am responsible for the day-to-day review of reports from service providers, reviewing FINTRAC error reports, following up with service providers, and reviewing incidents that BCLC investigators deemed not to be suspicious. In particular, I review every Unusual Financial Transaction ("UFT") that is deemed unsubstantiated to confirm whether or not I agree that it is in fact unsubstantiated. I am also involved in developing new AML programs and processes, as well as new processes to improve our existing AML programs.

86. I agree with the determinations of BCLC investigators regarding unsubstantiated UFTs in the vast majority of cases. There have been rare instances where I have noted further indicators in the course of my review and I have asked the investigator to reassess the outcome. Such indicators might include new information that was not available to the investigator at the time of their assessment, an individual being linked to high risk associates in iTrak, repeated similar behaviour that, on its own, may not be suspicious, or information subsequently received from other sources (e.g. law enforcement, AML analysts, etc...).

VII. The Current State of Casinos and Opportunities for Further Improvement

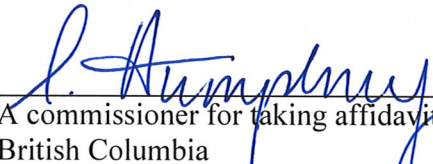
87. The current state of casinos is night and day compared to how it was in the early to mid-2010s. Now, BCLC investigators are able to look at and consider all kinds of additional information – they have access to AML analysts, BCLC has an information sharing agreement with the RCMP, and BCLC investigators participate in regular meetings with law enforcement agencies and GPEB investigators. As a result, BCLC investigators' access to information has never been better.
88. This improvement has occurred gradually since 2015 and has accelerated following the growing concern about illegal underground casinos and the formation of JIGIT. BCLC is currently looking for new AML solution software to further improve its AML capabilities.
89. Cash coming into casinos is no longer a major area of concern for the AML Unit. While there remains a risk of small, street-level drug dealers, for example, attempting to refine small amounts of cash by turning \$20 bills into \$100 bills, the risk is small and, if observed, any such behaviour would be investigated and addressed. Such behaviour might be addressed in a number of different ways, including suspending play, requesting an interview with the player, and/or imposing sourced cash conditions. Analysis would be requested from BCLC analysts and, depending on the results of such analysis, an assessment may be requested from JIGIT's GIU. Once all available information had been collected, BCLC investigators would conduct an assessment, likely in consultation with

the Manager of AML Programs, and a decision regarding the appropriate action to take would be made.

90. I have been informed by GPEB and law enforcement that bank drafts present a risk to the integrity of gaming, particularly from players using bank drafts that have been supplied by third parties. BCLC has taken steps to mitigate this risk, including imposing source of funds requirements for bank drafts. See **Exhibit “CC”**.
91. In my time as a BCLC investigator, I was never directed by anyone at BCLC to ease up on imposing cash conditions on players. There has been a steady increase in the number of players on cash conditions since the program was formally implemented in 2015.
92. In terms of improvements, I believe that the decision to set the source of funds requirement threshold at \$10,000 was a bad one. This is because the LCTR threshold is also set at \$10,000, which means that if a player buys in for just under \$10,000, it is difficult to know whether they are trying to avoiding a FINTRAC reporting threshold, or whether they are simply trying to avoid having to bring in a receipt to demonstrate the source of their cash.

93. Personally, I think that a hard cap on cash buy-ins in casinos is both reasonable and possible. I imagine the implementation of such a cap would require players wishing to play at a level above the established cap to use a gaming account. Having observed players of all levels of play over the course of my 20-year career in the gaming industry, I am, however, skeptical that all players would be interested in the idea of completely cashless casinos. I am skeptical because I do not believe that casual, low-level players would be willing to go through a potentially lengthy and complicated process to open an account and transfer funds into such an account in order to, for example, play for \$20 after having visited a casino's restaurant or attended a show at a casino. While more regular players may be willing to do so, I believe that a completely cashless casino would be an impediment for casual, low-level players.

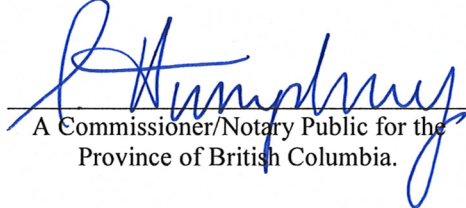
AFFIRMED BEFORE ME at Vancouver,
British Columbia, on October 22, 2020.


A commissioner for taking affidavits for
British Columbia


STEVEN BEEKSMA

SUSAN J. HUMPHREY
Barriater and Solicitor
Hunter Litigation Chambers
Suite 2100 - 1040 West Georgia Street
Vancouver, BC V6E 4H1
Telephone: 604-647-4558

THIS IS **EXHIBIT "A"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

^{22nd}

A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20070040558

Date/Time Occurred:	Redacted - RCMP	4:06 AM	Record Creation Details	
Day of Week Occurred:	Redacted - RCMP		Department:	Surveillance
Date/Time Created:	Redacted - RCMP	4:06 AM	Owner:	Redacted
Date/Time Closed:	Redacted - RCMP	4:25 AM	Operator ID:	Redacted
Closed By:	Redacted		Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position:	
			Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Surveillance

Sublocation:

Details of Incident:

Daily Log #: DL20070938322

Related Incidents: IN20070040609, IN20070040693

Type: Assistance To

Specific: Police

Category:

Incident Status: Closed

Synopsis: VPD Officer - Investigation.

Checklist:

Narrative:

Created On	Created By	Modified On	Modified By
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Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20070040558

Participants Involved:

Subject

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

Supplemental Entries:

SP20070077009 Attached by [Redacted] on [Redacted] 04:06

Description VPD Det. [Redacted] (gang unit) on site for the most of the evening keeping an eye on the known gang members (see participants) for a non gaming related matters. Total four pictures of the [Redacted] person of interest signed out into his custody. VPD off site once the participants retired into room 814 along with UN/AF. Room rented to [Redacted] and [Redacted]

GPEB # 24617

SP20070077045 Attached by jkarlovcec or [Redacted - RCMP] 09:39

Description [Redacted - RCMP] - BCLC investigator Don MERKAL and the writer attended the River Rock Surveillance room this day with two Richmond RCMP members Cst. [Redacted] and her trainer to review video footage in relation to a wallet theft that occurred approximately two weeks ago. When we arrived we noted two other Plainclothes members who identified themselves as Det./Cst. [Redacted] of VPD attached to the Combines Forces Special Enforcement Unit and Det./Cst. [Redacted] of the VPD Gang Crime Unit. The two of them were reviewing some video footage when, Cst. [Redacted] observed three individuals on a different Surveillance screen known to her as Gang members. The individuals in question are:

Redacted
- RCMP

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20070040558

SP20070077045 Attached by jkarlovcec on [Redacted] 09:39

SP2007007704

5 - Continued-

Redacted -
RCMP

Subject number 1 and number 2 were playing in the Dogwood high limits room while Subject # 3 was playing baccarat on the main gaming floor outside the high limit room.

As soon as Cst. [Redacted] observed subject # 2 [Redacted] she stated something to the effect that based on his history "he [Redacted] is probably packing a gun" which caused some immediate concern in the surveillance room. Cst. [Redacted] spoke to the two Richmond RCMP members and Surveillance Manager [Redacted] and was in discussions with them to have the Richmond RCMP members attend the gaming floor and have subject # 2 as well as his associates checked. She did not want to attend the gaming floor as, "the three would probably run" when they saw her.

The writer spoke with the two VPD members to determine if they had any intelligence that [Redacted] had a handgun in his possession. They advised that they did not but their criminal background leads them to feel that they could have a gun be it on their person or in their vehicle.

GM Rick DUFF, AGM [Redacted] and Security [Redacted] had attended the Surveillance Room having been called by Surveillance Manager [Redacted]. BCLC investigator Don MERKEL and the writer spoke with GM Rick DUFF at which time we suggested and it was agreed that it would be best to have surveillance monitor the activities of three individuals while they were on the gaming floor but not approach them as they were not bothering anyone and were not causing or given any indication that they would cause trouble. In our opinion it was not a good idea to send the Police down on the gaming floor to check these individuals.

It was suggested to the two VPD members that perhaps they should a surveillance team together which is what in fact what took place. River Rock Surveillance as of 17:30 hours this day were monitoring the activities of the three individuals who are still in the casino. Should the three depart the Casino the VPD will surveillance the three away from the Casino site.

Richmond RCMP Watch commander was made aware by his own members of the fact that VPD was in the area conducting Surveillance should VPD require Policing support.

Writer advised BCLC TOWNS and BCLC ROSS.

[J. KARLOVCEC]
BCLC RICHMOND
Casino Investigations

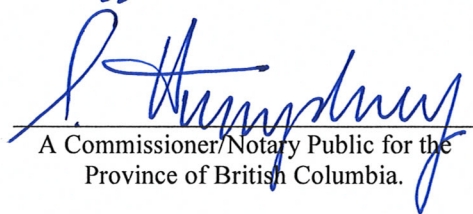
Reporting Party:

Supervisor:

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "B"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd

A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20100017708**

Date/Time Occurred:	5/ 5/2010 2:49 PM	Record Creation Details	
Day of Week Occurred:	Wednesday	Department:	Gaming Operations
Date/Time Created:	5/ 5/2010 2:49 PM	Owner:	cjames
Date/Time Closed:	11/ 2/2010 2:45 PM	Operator ID:	mbajic
Closed By:	canastasio	Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position	
		Secondary Operator:	

Location of Incident:

Property: Starlight Casino (GC)
Location: Back of House-Starlight Casino
Sublocation: Sierra Cage

Details of Incident:

Daily Log #: DL20100358617
Type: Assistance To
Specific: BCLC
Category:
Incident Status: Closed
Synopsis: Yu ZHANG cashed out \$1.2mil (05-04-10)

Checklist: **Redacted - FINTRAC**

Narrative:

Created On	Created By	Modified On	Modified By
5/ 5/2010 2:49 PM	mbajic		
Yu ZHANG cashed out \$1.2mil (05-04-10)			

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

Full Name:	[REDACTED]	Company:	
Role:	Patron		
Full Name:	LO, Tsui Hua	Company:	Balama Shipping Consultant Co
Role:	Patron		
Full Name:	ZHANG, Yu Xiang	Company:	
Role:	Patron		

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20100017708****Supplemental Entries:**

SP20100040974 Attached by mbajic on May 5, 2010 14:50

Description At approximately 10:32 VIP player Yu ZHANG bought in for \$125,000 on MDB8.

At 10:41 while ZHANG was playing on MDB8, an associate of ZHANG's [REDACTED] takes \$1.2mil worth of orange chips out of a brown envelope at CD8 for a cash out.

ZHANG played on MDB8 for approximately 30 minutes and cashed out \$219,725 at 11:04. ZHANG received \$94,725 in a check and the rest in cash.

ZHANG received \$1.2mil in cash which he put into a luggage bag. ZHANG left the property shortly after.

Footage of play, cashout and leaving the site saved to:
Exp1/Tables/May10/Misc/10-17708 05-04-10 Yu ZHANG \$1.2mil

SP20100041254 Attached by sbeeksma on May 6, 2010 15:02

Description Writer has initiated an investigation into this incident. Surveillance footage was reviewed on this day with surveillance supervisor Marko BAJIC. The footage supports what has been documented in this report.

-On 2010-MAY-04 at approx 1030 hrs ZHANG, Yu buys in on MDB 8 for \$125K. While he played on the table a know associate of his [REDACTED] attends the cash cage and empties an envelope containing 1.2 million in STAR \$5K chips for cashing out. The chips apparently belonged to ZHANG and [REDACTED] was cashing them out on his behalf while he played. [REDACTED] and ZHANG appear to reside at the same Richmond address according to the drivers licenses we have on file and are thought to be husband and wife/common law (7351 Lucas Rd). After approx 1 hour of play ZHANG cashes out his winnings for this day and receives cheque number 17642 for \$94,725 (verified by D/S Sandra REMATORE, GPEB#31016). ZHANG is also paid out the 1.2 million brought to the cage by [REDACTED] in cash of which he packs into a small suit case before departing the site together with [REDACTED].

Writer has received copies of the LCTR and table tracking documents from cage supervisor Christine HORVATH. As per the tracking documents ZHANG bought in on MDB 8 at approx 1035hrs for \$125K and at approx 1137hrs he cashes out for a total of \$219,725. \$94,725 was paid out in the form of a cheque with remainder paid out in cash. Applying the cash out minus the buy in this is the full amount eligible for a verified win.

There are some areas of concern surrounding this incident. Writer met with EGM Tim BARNETT regarding this incident, in particular with regards to a letter the site drafted for ZHANG and the lack of details/supplemental reports from the operations staff involved. Writer has requested from BARNETT that the staff involved update the incident with all pertinent details as to what transpired including the details surrounding the letter requested by ZHANG. The letter has been attached to the media of this incident file. Writer will follow up with this once all supplementals have been added.

The LCTR hard copy and electronic copies are not consistent. According to the electronic Fintrac entry in iTrak ZHANG was paid out 1.2 million for a NVW (Non-Verified-Win) in the form of a cheque verified by shift manager Martin Kelly GPEB# 25896. This appears to be a data entry error as both the hard copy paperwork and the surveillance footage show that ZHANG was paid the 1.2 million in cash.

[REDACTED] (SID 73761) should be documented on the LCTR as a 3rd party to ZHANG considering she presented the chips.

2010-MAY-07 Writer notes the added supplementals by operations staff involved. VIP manager Cathy SHEN is the only one absent. EGM Tim BARNETT has advised he will have her do it on her next shift.

Cage manager McNEIL attended the writers office on this day to shed some light on this incident.

Reporting Party:

Supervisor:

SP20100041254 Attached by sbeeksma on May 6, 2010 15:02

SP2010004125

4 - Continued-

McNEIL advised that after consulting with BCLC MERKEL, who was unable to give a definite yes or no that he had called Gateway director of compliance, ATCHISON for guidance. McNEIL informed the writer that ATCHISON advised against drafting a letter. McNEIL informed the writer that after speaking with ATCHISON he went back to the floor to relay the decision to the player/management involved. It was at this point it appears EGM BARNETT was consulted.

Writer attended site surveillance and met with surveillance manager Uros SAVIC to conduct further review on what transpired this day. Details as follows:

-On 2010-MAY-04 at approx 1020 ZHANG and [REDACTED] arrive together in a Lexus SUV BCLP 999LBX. They attend the cash cage where by ZHANG produces 125K in 5K chips that were held in [REDACTED]'s bag/purse. The chips are used as a table buy in at the cage with the slip being taken from the cage to the table (MDB 8) by VIP Sandra VanSTEIJN. Both [REDACTED] and ZHANG attend MDB 8. ZHANG begins to play with [REDACTED] observing (LCTR 2010-12347 refers).

-At approx 1041 [REDACTED] attends the cash cage where she produces the 1.2 mil in chips for cashing out. The site is unable to cash it all out with the cash they have on hand and needs to have funds brought over from the Grand Villa to complete the transaction. The chips are left in the cage and XIE returns to ZHANG at MDB 8.

-At approx 1141 ZHANG and [REDACTED] are at the cash cage and paid cash for the full 1.2 mil. ZHANG also cashes out his play from this day and receives a verified win cheque for \$94,725 as detailed above. ZHANG loads the cash into a small suitcase and both ZHANG and [REDACTED] leave the site in the aforementioned vehicle.

A section 86 has been forwarded to GPEB via email CC'd GPEB investigator Mark FORSHAW.

2010-MAY-10 Writer notes supplemental from VIP management Cathy SHEN. It appears the letter was given to another patron, LO, "Amy" Tsui. While the writer was reviewing incident footage with surveillance manager SAVIC we were unable to locate the footage of the letter being given to ZHANG. Writer has requested further review from site surveillance given this new information.

2010-MAY-11 As per email confirmation from STAR surveillance manager SAVIC all relevant incident footage has been saved as requested.

Redacted - FINTRAC

This incident will be discussed with the site on an executive level. The writer has concluded the investigation into this incident. All necessary reports have been filed and supporting footage retained/saved in STAR surveillance.

2010-MAY-17 SAVIC confirmed the footage of SHEN given the letter to patron Amy LO has been recovered and saved (an envelope was given to LO by SHEN on 2010-MAY-04 at approx 1328hrs thought to contain the letter). Writer spoke with Gateways director of compliance ATCHISON on this day. ATCHISON advised that he clearly advised the site when consulted that they should not provide ZHANG with this letter. The site did so going against his advisement.

S.BEEKSMA
BCLC
Casino Investigations

SP20100041484 Attached by mharding on May 7, 2010 10:24

Description On gaming day 04 May 2010 morning, writer was informed by Senior VIP Room Manager Cathy Shen that Mr Zhang Yu Xiang was cashing out \$1.2m gaming chips and would like us to issue a letter stating the cash out.

Writer went down to Sierra cage and greeted Zhang and Zhang raised the same request to the write regarding the letter. Zhang said he was cashing out because he was heading to a casino in

Reporting Party:

Supervisor:

Printed: 10/8/2020 1:01 PM

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BCLC0016352.03

SP20100041484 Attached by mharding on May 7, 2010 10:24

SP2010004148

4 - Continued-

Montreal and was concerned about a potential issue with Airport Security as he doesn't speak English. Zhang was worried that when they x-rayed his suitcase they would ask questions regarding where he obtained such a large amount of money from.

Writer then passed the message to cage manager Raymond MacNeil and asked him to speak to Starlight EGM Tim Barnett. At the same time, writer contacted Matthew Ballesty - Senior VP of VIP Operations and informed him of Zhang's request. Mr Ballesty said he does not see any problems to issue Zhang with the letter only stating the cash out transaction (not verifying any win) and Ballesty said he will call Tim Barnett to discuss the issue.

After 15 minutes, I followed up with Raymond MacNeil and he confirmed that Tim Barnett agreed that it was a reasonable request only stating the "cash out transaction" and but not "verifying win" as the chips had been accumulated over multiple gaming days. The document was to be factual in nature only.

Writer then followed up with Tim Barnett who has spoken to Matthew Ballesty and Tim informed me that he and Glenn Atchison had agreed on the wording for the letter as follows:

"The letter is to confirm that Mr Zhang Yu Xiang cashed out \$1.2m in Starlight gaming chips on Tuesday 04 May 2010. For further information please contact Ms Meiling Harding, Director VIP Services and Business Development [REDACTED]
Kind Regards, Meiling Harding"

Writer then went up to Tim Barnett office and Tim presented the writer with the letter and asked for the writer's signature for the letter. Writer signed the letter, Tim Barnett made a copy of the letter and then handed the letter to the writer to give to Zhang,

Writer then contacted Cathy Shen and gave the letter to Cathy to pass onto Zhang,

This concluded the writer's involvement in the matter.

SP20100041493 Attached by rmacneil on May 7, 2010 11:20

Description On May 04, 2010 ZHANG, Yu Xiang brought in 1.2 million in chips and was cashed out. I was approached by Meiling HARDING regarding a request from patron ZHANG, Yu Xiang. Mr. Zhang was travelling to Montreal to gamble and wanted us to provide a letter stating that he cashed out 1.2 million in chips. I spoke with Glenn ATCHISON and he advised against issuing a letter. I returned with this information to Meiling Harding and she then instructed me to inform Tim BARNETT. I then informed Tim BARNETT of the situation.

SP20100041506 Attached by tbarnett on May 7, 2010 12:15

Description On 4 May, 2010 I was informed by Cage Manager Raymond MacNeil that VIP Customer Mr Zhang Yu Xiang wished to cash out \$1.2m in Gaming chips. Xiang had requested a letter confirming that he had cashed out the chips as he was about to go to the airport to catch a plane to Montreal and was concerned about questions from Airport Security. MacNeil stated that he had called Gateway Casinos Manager of Compliance, Glenn Atchison for advice and he had advised against it. I thought it was a reasonable request so I told MacNeil that I would now find out more about the situation. I called Matt Ballesty, Senior Vice-President of VIP Operations to discuss the situation and he and I agreed that whilst we could not write a letter confirming that the cash related to a win at Starlight as the \$1.2m had been accumulated over multiple gaming days and could therefore not be verified, it was reasonable to offer assistance to a VIP customer who would no doubt, due to language difficulties, have issues at the Airport. I told Ballesty that I would call Glenn Atchison to discuss the matter further. I then discussed the issue by phone with Glenn Atchison. Glenn's concern was that we could not verify the win. I agreed with his concerns and that we could not issue any letter verifying a win. The only information a letter should contain should be a factual statement that Mr Zhang cashed out \$1.2m in gaming chips on the above date

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20100017708**

SP20100041506 Attached by tbarnett on May 7, 2010 12:15

SP2010004150
6 - Continued-

and that if any further information was required to contact Meiling Harding, Director VIP Service and Business Development. Glenn then assisted me with the wording of the letter which I then had printed out and presented to Meiling for signature. Meiling then proceeded to take the letter down to the casino floor.

SP20100041858 Attached by cshen on May 8, 2010 11:41

Description Starlight Casino New Westminster BC
May 08 2010
Reported by VIP Room Manager Cathy SHEN

On the gaming day of May 04 at approximately 11:10hrs, the writer arrived the casino witnessing patron Yu Xiang ZHANG and his wife [REDACTED] were at the Sierra cash cage waiting for a cash out transaction of \$1.2million. The writer later learned that ZHANG has made a request of a letter stating this cash out transaction as ZHANG and his friends have booked a flight to Montreal on the same day. ZHANG stated that he does not speak English and he will be taking the \$1.2m of cash to Montreal casino, he was concerned about passing airport security when questioned about the cash. The writer relayed ZHANG's concern to director of VIP business Meiling HARDING. HARDING has made contact with other authorities for approval. ZHANG had to leave the casino after the completion of the cash out transaction and asked the writer to give the letter to another patron Tsui Hua LO who was playing on MDB8 if the letter was issued. The writer later on was informed by HARDING that the letter was ready. The writer gave the letter to Tsui Hua LO and asked her to give it to ZHANG when they were leaving for Montreal together.
End of report.

SP20100043744 Attached by cbjornson on May 14, 2010 13:08

Description

SP20100044686 Attached by sbeeksma on May 17, 2010 13:13

Description The following email correspondence received from BCLC manager of corporate security and surveillance MORRISON on this day outlining the results of a meeting held this day with Starlight/Gateway upper management. This correspondence has been copied and pasted and has not been altered from the original:

"From: Doug Morrison
Sent: May 17, 2010 12:18 PM
To: Steve Beeksma; Gordon Friesen; John Karlovcec
Cc: Don Merkel; Doug Morrison; Terry Towns
Subject: RE: Starlight - Zhang Letter - Confidential

This morning – Darryl Schiewe, Towns, Bailey and myself met with and discussed this incident with Darren Harding and Matthew Ballesty from Gateway Casinos,

The follow-up will serve as an update that should be loaded into ITrak for whoever has time !

- 1) Senior Management of Gateway has met with Starlight management and VIP staff to discuss this incident and how displeased Gateway Casinos are with this decision to release a letter!
- 2) Senior Management has having additional 'new' policy put into place ASAP about incidents involving VIP patrons and FinTrac and this will make the decision making not rest with site personnel.
- 3) Stan Wager is to become more involved in this process and is to be contacted for input and direction.
- 4) VIP staff and management are to contact and obtain opinions and direction from BCLC casino investigators regarding VIP patrons and issues surrounding patrons.
- 5) Enhanced reporting and correct reporting will be stressed with a further follow-up meeting with Starlight management and VIP staff.

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20100017708**

SP20100044686 Attached by sbeeksma on May 17, 2010 13:13

SP2010004468

6 - Continued-

Senior Management from Gateway will continue to monitor this situation and I would suggest a FinTrac training course for both Management and VIP hosts and hostesses and management be undertaken sooner then later.

Thanks

Doug"

S.BEEKSMA
BCLC
Casino Investigations

Reporting Party:**Supervisor:**

Printed: 10/ 8/2020 1:01 PM

Page 6 / 6

BCLC0016352.06

THIS IS **EXHIBIT "C"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

L. Humphrey
A Commissioner/Notary Public for the
Province of British Columbia.

To: Steve Beeksmat [REDACTED]; Rick Pannu [REDACTED]
From: Mike Hiller
Sent: Mon 2010-05-17 9:58:12 PM
Subject: FW: Further Request - RRCR 2010-0018409 \$460K Buy-in
[Form 86 RRCR 2010-18409.doc](#)

FYI.....Doug's follow-up.

Mike HILLER

BCLC Casino Security Investigator
 10760 Shellbridge Way, Richmond, B.C. V6X 3H1

T [REDACTED] C [REDACTED]

[REDACTED]

From: Doug Morrison
Sent: May 17, 2010 1:40 PM
To: Mike Hiller
Cc: Gordon Friesen; John Karlovcec
Subject: FW: Further Request - RRCR 2010-0018409 \$460K Buy-in

Here is my email to Bolton and Ennis and Egli – addressing that very fact.

Doug

From: Doug Morrison
Sent: May 17, 2010 1:39 PM
To: 'Carl Bolton'
Cc: 'Patrick Ennis'; Terry Towns; Brian Egli
Subject: FW: Further Request - RRCR 2010-0018409 \$460K Buy-in

Carl – I guess it is with these types of activities when Dave mentions that it was only because 'BCLC found it suspicious' that it is being reported via 86 that leave me pondering!
 I really have to question what on earth Dave is truly thinking about. Here we have an individual bringing in 2 bags full of \$20.00 bills into the casino and he and the rest of surveillance don't find this suspicious?

Honestly, where would you go to find \$460,000.00 in \$20 dollar bills? If you walked into a bank – they wouldn't accept this money – even if you had an account at the branch!

If GCGC and BCLC are going to weather the storm with FinTrac and FinTrac training – we need not just some of your staff but all of your staff on side with this legislation. I don't see that happening here with Dave Pacey and he's the surveillance manager.

Ultimately, how do we both defend a reporting system and validate these reports to FinTrac – when we see this type of non-commitment by first line senior staff.

Doug Morrison

From: Mike Hiller
Sent: May 17, 2010 8:55 AM
To: BCRCR Surveillance Shift Managers; Dave Pacey

Cc: Rick Pannu; Steve Beeksma

Subject: Further Request - RRCR 2010-0018409 \$460K Buy-in

Dave,

I have attached the form 86 you sent on this incident as a reference for my comments here. The incident on May 2nd involved a LCT male (██████████) who brought in two large bags containing \$460,000 in \$20s. I read with interest your comments in the form 86, that "None of his actions while in the casino were suspicious, ie. loansharking or money laundering but it is just the amount of buy-ins that BCLC has found suspicious".

If this male brought two bags with that amount of money to a bank, the bank employee would surely find it suspicious, and the bank would be obligated to report the suspicious activity to FINTRAC (even if the denominations were \$100s). How is it that this sort of suspicious activity can change just because the male brought the money to a casino? I see nothing that differentiates the two scenarios.

Surveillance should be the front line with this thing and it should have reported the incident as "suspicious activity" before the need for a BCLC investigator to request it. In the future I would expect that this type of buy-in is reported as "suspicious" activity.

Request:

Due to being busy, I didn't get to review the video footage until Wednesday afternoon. Unfortunately, I then didn't get a chance to check iTrak to determine whether this was one of the chip passing incidents involving ██████████ and his "Chinese friends" because I was away from River Rock for part of the end of the week. I just noticed this was not one of the chip passing incidents reported during the week or so where ██████████ was involved in "joint play/sharing his chips" with his friends. But I noticed during my review of the video that ██████████ came to the casino with the same 4 Chinese friends on May 2, and they were all waiting for him at MDB 28 while he conducted the \$460,000 buy-in. I would have expected that chip passing occurred as soon as ██████████ got the chips at the table. Please check with the surveillance operator who watched this "high limit play" and advise whether this did in fact occur.

Thank you,

Mike HILLER

BCLC Casino Security Investigator

10760 Shellbridge Way, Richmond, B.C. V6X 3H1

T ██████████

C ██████████

██████████

Appendix B



**Gaming Policy and Enforcement Branch
Investigation Division**

SECTION 86 G C ACT REPORT

TO BE SUBMITTED WITHOUT DELAY.

Date: May 13th, 2010

Service Provider: GCC - RRCR

Location: 8811 River Road, Richmond B.C.

Occurrence: Several large buy-ins during the course of a week.

Date & Time of Occurrence: May 2, 3 and 9th, 2010

Details: [REDACTED] bought in on 4 different occasions with large amounts of various denominations of bills; for example ;\$460,000 in 20's on May 2, 2010. None of his actions while in the casino were suspicious ie. loansharking or money laundering but it is just the amount of buy-ins that BCLC has found suspicious. RRCR Inc#10-18409

Police Called: Yes ☐ No ☒

Attended: Yes ☐ No ☒

Police Force:

File Number:

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

Submitted by: Dave Pacey

E-Mail [REDACTED]

GPEB Registration #: 18830

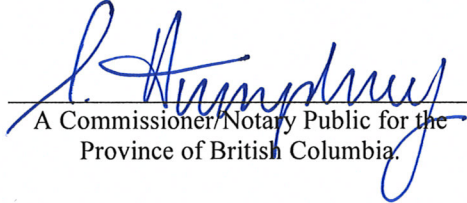
E-Mail [REDACTED]

Lower Mainland Regional Office, 408-4603 Kingsway Ave, Burnaby BC V5H 4M4

Page 2

BCI 00015836 02

THIS IS **EXHIBIT "D"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20140052723**

Date/Time Occurred: 10/18/2014 3:18 AM
Day of Week Occurred: Saturday
Date/Time Created: 10/18/2014 3:22 AM
Date/Time Closed:
Closed By:



Record Creation Details

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

Location of Incident:

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

Details of Incident:

Daily Log #: DL20140965932
Type: Gaming
Specific: Unusual Financial Transaction
Category: 
Risk Classification:
Incident Status: Closed
Custom 3:
Custom 4:
Synopsis: B/I of \$645,105 for Sub.ID#144419 to MDB 27 (4493 X \$50 , 2744 X \$100 , 7302 X \$20 , 1 X \$5 , 1 X \$10) M412
Checklist: - Section 86 Form


Narrative:

Created On	Created By	Modified On	Modified By
10/18/2014 3:23 AM	Irezek		
B/I of \$645,105 for Sub.ID#144419 to MDB 27 (4493 X \$50 , 2744 X \$100 , 7302 X \$20 , 1 X \$5 , 1 X \$10)			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20140052723****Participants Involved:****Personnel**

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

Date Of Birth:

Subject

Full Name: WEI, Kesi Company: Hua Bao Financial Service
Role: Owner Company

Date Of Birth: [REDACTED]

Address: [REDACTED]

Contact Info: Tel: [REDACTED]

Full Name: [REDACTED] Company:

Role: Registered Owner

Date Of Birth: [REDACTED]

Address: [REDACTED]

Contact Info:

Full Name: TAM, Kwok Chung Company:

Role: Suspect

Date Of Birth: [REDACTED]

Address: [REDACTED]

Contact Info:

Supplemental Entries:

SP20140145578 Attached by Iwan on Oct 18, 2014 06:47

Description

At 0200 hrs, WEI Kesi is seen holding 4 stacks of 5K chips at MDB 27 and answering a phone call. Live monitoring has begun and WEI leaves Salon immediately and picks up a green shopping bag from a white Mercedes Benz L/P 889RTJ. Driver could not be identified due to lack of lighting. WEI returns to Salon and empties the bag. Bills consist of 1 x \$5, 1 x \$10, 7302 x \$20, 4493, x \$50, & 2744 x \$100 totaling \$645,105. At 0314 hrs, WEI receives 129 x 5K, 1 x \$100, & 1 x \$5 in chips at MDB 27. He takes \$45,105 in chips and moves to MDB 29 and starts to play significant. His 600K worth of chips are left at MDB 27. At 0521 hrs, WEI returns to MDB 27 and takes one stack of 5K and plays at MDB 29 again. At 0525 hrs, WEI returns to MDB 27 and continues to play with his chips.

Form 86 sent.

Footage saved to M & Y folder.

L WAN
25549**Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20140052723**

SP20140147098 Attached by sbeeksm on Oct 21, 2014 12:08

Description Incident noted, writer to follow up.

On the early morning of 2014-OCT-18 a regular male casino patron identified as WEI, Kesi produced \$645,105 in CDN currency for buying in at River Rocks VIP Salon.

Prior to the unusual circumstances detailed here WEI conducted 2 buy ins from his Player Gaming Fund (PGF) account totalling \$500K.

Approx 10 minutes after receiving the chips from his second PGF buy in (\$300K) WEI received a phone call then meets with a vehicle described as a Mercedes sedan with BCLP 889RTJ from which he acquired a bag that contained the cash.

The occupants of this vehicle could not be verified however the writer has requested RO information from a law enforcement contact and casino records will be updated once received.

On 2014-OCT-21 the writer attended site surveillance and reviewed incident footage. The footage supports what has been documented in this report.

Incident details:

As mentioned above, WEI started his gaming activity this date with buy ins from his PGF account. The first \$200K was withdrawn at approx 2223hrs (2014-OCT-17). WEI gambled then initiated a second withdrawal of \$300K receiving the chips for this at approx 0151hrs.

Immediately upon receipt of the \$300K in chips WEI begins to bet very aggressively. He loses \$100K in two hands then nets \$100K on a single hand which is won. He follows this bet with another \$100K bet which is also won; WEI is now holding approx \$400K in chips.

-At approx 0200hrs a table fill arrives to replenish the \$5K chips in the float (the game is now on hold). WEI's cell phone is face up on the table and the screen lights up indicating an incoming call. WEI doesn't notice the incoming call immediately but when he does he picks up the phone and answers the call.

WEI gets up from the table (leaving the \$400K behind) and exits the Salon into the hotel lobby and makes his way down to the ground floor.

-At approx 0202hrs the above described Mercedes sedan enters the resorts driveway. WEI exits the hotel lobby at around the same time and motions to the vehicle to pull over ahead. The vehicle pulls over just past the valet podium and WEI opens the back passenger door; surveillance was live monitoring and was able to capture the license plate as detailed above. From here WEI acquired a large green shopping bag then returned to the hotel lobby making his way back to the VIP Salon. The Mercedes continues along the driveway and off site.

-At approx 0204hrs WEI returned to the casinos VIP Salon and is escorted into the private cashier room by a guest services employee.

Inside here WEI emptied the shopping bag now confirmed to contain numerous bricks/bundles of CDN currency all bound by elastic bands. The cash was in various denominations both new polymer bills and old bills.

Once the bag is emptied WEI exits to the gaming floor of the Salon as cashiers begin to count the money.

WEI plays with the chips left from the PGF buy in as the cash is being counted.

-By approx 0301hrs cashiers have completed counting all of the cash which totalled \$645,105.

Denominations broken down as follows:

1X\$5 = \$5
 1X\$10 = \$10
 7302X\$20 = \$146,040
 4493X\$50 = \$224,650
 2744X\$100 = \$274,400

-At approx 0316hrs WEI receives the casino chips on Midi-Baccarat table 27 completing the buy in transaction. He initially leaves the chips here while he continues playing on another table in the

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20140052723**

SP20140147098 Attached by sbeeksma on Oct 21, 2014 12:08

SP2014014709
8 - Continued-

Salon.

-At approx 0521hrs he takes possession of the chips left here and begins to gamble with them putting substantial amounts at risk with no irregularities noted in his gambling behaviour this date. Further review confirms that he gambled here until approx 0857hrs at which time he left the table holding only \$100K in chips.

Review of WEI's LCT record this date confirms he did not receive any disbursements.

Conclusion:

Although WEI did appear to be gambling legitimately this date the source of the cash may be questionable [REDACTED] (and has previously acquired money from questionable sources/POI).

According to casino records WEI has previously provided his occupation as a "Real Estate Developer". Although he may be wealthy this does not provide a reasonable explanation as to where such a significant volume of cash used for the buy in may have originated. Furthermore a delivery of significant amounts of cash to the casino in the early morning or late evening hours is a casino indicator of an unusual transaction. Cash presented in bricks bound by elastic bands also suggest the money did not come from a recognized financial institution.

[REDACTED]

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

S.BEEKSMA
BCLC
Casino Investigations

SP20140147137 Attached by sbeeksma on Oct 21, 2014 13:51

Description

[REDACTED]

GPEBS BARBER and ACKLES cc'd on email to IPOC.

S.BEEKSMA
BCLC
Casino Investigations

SP20140147145 Attached by sbeeksma on Oct 21, 2014 14:05

Description

Registered owner information has been obtained as follows:

This BCLP was terminated on 2014-03-11 and replaced by 639XLW. That plates comes back to the following:

2003 MERCEDES E 320 4DSDN PASSENGER GREY

[REDACTED]

ODN: [REDACTED] PODL: [REDACTED]
DOB: [REDACTED] SEX: M

[REDACTED] is in iTrak (SID 51446) and is currently enrolled in the VSE program. The correct LP number

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20140052723**

SP20140147145 Attached by sbeeksma on Oct 21, 2014 14:05

SP2014014714

5 - Continued-

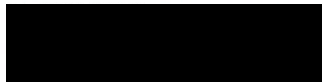
as detailed in this incident report was verified on camera. The new updated plate provided by the RCMP is not in our database. Confirmed with RCMP that this was a recent incident and the old plate appears to be still in use by someone.

*Update - Re-reviewed footage and confirmed the LP is actually 899RTJ, not 889RTJ. The registered owner information detailed above is irrelevant.

2014-NOV-06 relevant RO particulars have been forwarded to the writer by BCLC AML Specialist Daryl TOTTENHAM (byway of law enforcement contact) as follows:

LIC:899RTJ

2005 MERCEDES C230 4DSDN PASSENGER WHITE



ODN: [REDACTED] PODL: [REDACTED]

DOB: [REDACTED] SEX: F

This female is in iTrak (SID 140890 with no media) for a cash delivery at STAR.

S.BEEKSMA

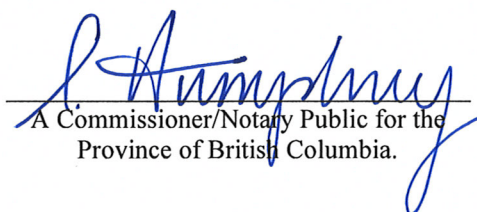
BCLC

Casino Investigations

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "E"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20150009353**

Date/Time Occurred:	Redacted - RCMP 9:31 AM	Record Creation Details	
Day of Week Occurred:	Redacted - RCMP	Department:	Surveillance
Date/Time Created:	Redacted - RCMP 9:36 AM	Owner:	agoodrich
Date/Time Closed:		Operator ID:	agoodrich
Closed By:		Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Back of House-River Rock (GCC)

Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20150169193

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Synopsis: bms 3400 cash counter used cd 19 (SID Redacted - RCMP 300K b/i all in 20's)

Checklist: - Section 86 Form

Redacted - FINTRAC**Narrative:**

Created On	Created By	Modified On	Modified By
Redacted - RCMP 9:36 AM	agoodrich		
SID Redacted - RCMP small denomination b/i all in 20's=\$300k b/i to MDB 24			

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

Incident File Full Report**Incident File #IN20150009353****Participants Involved:****Personnel**

Full Name: BEEKSMA, Steve

Property: Vancouver (BCLC)

Role: Documenter

Department: BCLC

Subject

Full Name:

Company:

Redacted - RCMP

Role:

Redacted

Full Name:

Company: Edgewater Casino

Role:

- RCMP

Supplemental Entries:

SP20150026014 Attached by Iwan on Redacted - RCMP 11:06

Description Surveillance became aware of a large buy in for Redacted - RCMP at CD 19 at 0930 hrs.

Review showed Redacted arrive in a yellow cab with Redacted - RCMP at 0921 hrs. They emerge from the vehicle and Redacted is seen getting a black wheeled suitcase from the cab driver from the trunk. Both enter resort lobby and Redacted talks on the phone. Redacted takes an escalator up to 3/F with the suitcase and Redacted was staying in resort lobby talking on the phone briefly Redacted takes west elevator up to 3/F later as well. Redacted sits on a couch outside salon glass entrance door and places the suitcase next to her. Shortly thereafter Redacted arrives too and picks the suitcase up and enters Salon with Redacted at 0925 hrs. Redacted takes the suitcase to Salon lounge and removes numerous bundles of \$20's from it. It was split into two buy ins and the first buy in consists of 14000 x \$20's totaling 280K. At 1020 hrs, Redacted receives 56 x 5K in chips on MDB 24 and starts to put substantial amount at risk. Redacted sits at the same table watching his play. The 2nd buy in consists of 33 x \$50, 1411 x \$20, 14 x \$10, & 2 x \$5 totaling \$30,020. At 1050 hrs, Redacted receives his 2nd buy in chips 6 x 5K & 4 x \$5 on MDB 23 and continues to play. Redacted is seen sitting at the same table too watching his play.

Form 86 sent.

Footage saved to M & Y/ Redacted - RCMP /UFT/15-09353.

L WAN
25549

SP20150027654 Attached by sbeeksma on Redacted - RCMP 10:58

Description

Redacted - FINTRAC

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150009353

SP20150027654 Attached by sbeeksma on Redacted - RCMP 10:58

SP2015002765
4 - Continued-

Redacted
- FINTRAC

Redacted -
RCMP will continue to be monitored when attending BC Casinos with reports escalated as
deemed necessary.

S.BEEKSMA
BCLC
Casino Investigations

Reporting Party:

Supervisor:

Printed: 7/30/2020 7:27 AM

Page 3 / 5

BCL 00015370 03

Incident File Full Report**Incident File #IN20150009353**SP20150027714 Attached by sbeeksma on Redacted - RCMP 12:53

Description

Redacted - FINTRAC

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

S.BEEKSMA
BCLC
Casino Investigations

Reporting Party:**Supervisor:**

Printed: 7/30/2020 7:27 AM

Page 4 / 5

Incident File Full Report

Incident File #IN20150009353

List of Attached Forms:

Prefix

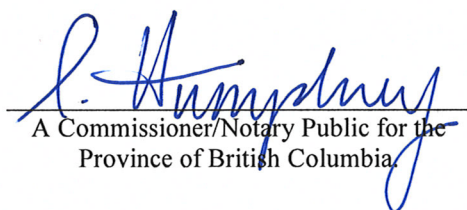
Form Name

Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "F"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Patrick Ennis

From: Gordon Friesen <[REDACTED]>
Sent: Wednesday, November 03, 2010 6:14 PM
To: Rick Pannu; Mike Hiller; Steve Beeksma
Cc: John Karlovcec; Patrick Ennis; Patrick Ennis
Subject: Large Cash Transactions

Importance: High

Gentlemen

I had a conversation with Pat ENNIS today wherein he advised that GPEB Derek DICKSON had requested River Rock Surveillance notify them via Sec. 86 Report of any buy in of \$50,000 or more where conducted with \$20 bills. In our discussion Pat advised he would instruct his employees to open an incident report and put a brief note in it as to circumstances etc. Therefore, we would be advised and could monitor and/or investigate these transactions as required and add the necessary supplement(s). If in our investigation we feel it requires an SFT and report to Fintrac, we will file a report and change the drop down or request a change.

Should anyone have any questions please call me or discuss with Pat at any time.

Thank you!

Gord

Gord Friesen

Manager, Corporate Security & Surveillance

10760 Shellbridge Way

Richmond, B.C, V6X 3H1

T [REDACTED]

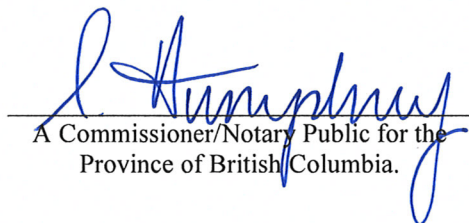
C [REDACTED]

F 604 276 6488

E [REDACTED]

THIS IS **EXHIBIT "G"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20120012914

Date/Time Occurred:	Redacted - RCMP	10:08 AM	Record Creation Details	
Day of Week Occurred:	Redacted - RCMP		Department:	Gaming Operations
Date/Time Created:	Redacted - RCMP	10:09 AM	Owner:	annchu
Date/Time Closed:	Redacted - RCMP	9:28 AM	Operator ID:	djankovic
Closed By:	ralderson		Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position:	
			Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Surveillance-River Rock (GCC)

Sublocation:

Details of Incident:

Daily Log #: DL20120244215

Related Incidents: IN20120013577

Type: Large Cash Transaction

Specific: Unusual Activity

Category:

Incident Status: Closed

Synopsis: BCLC ALDERSON

Checklist: - Section 86 Form

Narrative: Redacted - FINTRAC

Created On	Created By	Modified On	Modified By
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Redacted - RCMP 10:09 AM djankovic

Changed Incident type to Unusual Activity.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

Participants Involved:

Personnel

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

Subject

Full Name: [Redacted] Company:
 Role: [Redacted]

Full Name: [Redacted] Company: Jiahe Financial
 Role: [Redacted]

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

Full Name: [Redacted] Company:
 Role: [Redacted]

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
[Redacted] - RCMP	Watch	[Redacted] - RCMP	Permanent

Type Of Ban: Notes:

Reason For Ban:

Identification:

[Redacted] - RCMP	Watch	[Redacted] - RCMP	Permanent
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Type Of Ban: Notes:

Reason For Ban:

Identification:

Supplemental Entries:

SP20120033220 Attached by djankovic on [Redacted] - RCMP 11:21

Description On [Redacted] - RCMP surveillance received a following request from BCLC ALDERSON:

Hi Arlene,

Could I please get a review on [Redacted] for [Redacted] - He had \$580K in total buy in's. Although most of it was in \$50 and \$100 bills it is a significant buy in for one day and he does have recent STR history.

As per his Blue card

1047 hrs - \$100K buy in (MDB26)

1327 hrs - \$100K buy in (MDB26)

1506 hrs - \$180K buy in (MDB26)

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #N20120012914

SP20120033220 Attached by djankovic on [Redacted] 11:21

SP2012003322

0 - Continued-

1706 hrs - \$200K buy in (MDB29)

I would like to know his movements before and after each buy in. At face value it appears he loses and then buys in again. I am keen to know where he gets his cash. I am not too concerned with his play unless anything out of the ordinary is detected.

Thank you very much and please treat as non urgent.

Cheers!

Ross Alderson

Casino Investigations

BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6

T [Redacted] C [Redacted]

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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.

This email is intended only for the addressee. It may contain confidential or proprietary information that cannot be disclosed without BCLC's permission. If you have received this email in error, please notify the sender immediately and delete the email.

Review showed following:

- 1032hrs SID # [Redacted] valet's his [Redacted - RCMP] is a lone occupant and is seen carrying a green bag.
- 1034hrs SID # [Redacted - RCMP] is at CD 19.
- 1045hrs SID # [Redacted] receives chips at MDB 26 and starts playing.
- 1219hrs patron runs out of chips. Leaves salon. Is seen on the phone while walking by hotel reception.
- 1222hrs pick his car from valet and leaves site.
- 1314hrs SID # [Redacted] valet's his [Redacted - RCMP] is a lone occupant and is seen carrying, what is [Redacted] like a yellow postage envelope.
- 1318hrs SID # [Redacted - RCMP] is at CD 19.
- 1325hrs SID # [Redacted] receives chips at MDB 26 and starts playing.
- 1329hrs runs out of chips. Leaves salon and could be seen on the phone on his way out.
- 1332hrs SID # [Redacted] pick his car from valet and leaves site.
- 1443hrs SID # [Redacted] comes with his SUV and meets two AF's in the valet area. One of the AF is seen carrying a black backpack which was given to SID # [Redacted] upon a meet. All three head up to the salon with SID # [Redacted - RCMP] carrying a backpack.
- Upon entering the salon the two AF were identified as SID #s [Redacted - RCMP]
- 1448hrs money is taken out of backpack and presented at CD 19.
- 1448hrs sits down at MDB 26 and it could be seen he is taking chips out of his inside jacket pocket. It appears to be approximately 100K in 5K chips. SID # [Redacted] starts playing. Both, SID # [Redacted - RCMP] sit with him and are not playing.
- 1502hrs receives chips on MDB 26 and moves to MDB 24 until 1538hrs when he moves to MDB 29. Again both females are accompanying him all the time.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

SP20120033220 Attached by djankovic on [Redacted - RCMP] 11:21

SP2012003322

0 - Continued-

- 1554hrs [Redacted - RCMP] runs out of chips.
- 1557hrs leaves salon and can be seen on the phone in front of the reception. Moments later he is joined by SID [Redacted - RCMP]. Both can be seen on the phones. Both go down to hotel lobby for a smoke and SID [Redacted - RCMP] leaves him and heads upstairs. SID # [Redacted - RCMP] can be seen loitering around the hotel lobby and on the gaming floor.
- 1646hrs SID # [Redacted - RCMP] is out in front of the hotel lobby when [Redacted - RCMP] comes up and SID # [Redacted - RCMP] can be seen picking up black backpack from the passenger side and then walking up to the salon. [Redacted - RCMP] drives off and parks in the south parkade (BC I/p [Redacted - RCMP]).
- 1649hrs money is presented at CD 19 from the black backpack.
- 1704hrs receives chips at MDB 29 and starts playing. Both, SID [Redacted - RCMP] are with him at the table.

Further review showed [Redacted - RCMP] arriving on site at 1440hrs prior to 180K buy in. Driver goes out of the vehicle and heads towards the hotel lobby but comes back at 1442hrs and then a passenger comes out. It appears that they take something out of the car and they start walking towards the valet area. SID # [Redacted - RCMP] is seen carrying a black backpack. Moments later they meet SID # [Redacted - RCMP] and hand over the backpack.

Review also showed that before the [Redacted - RCMP] dropped off a black backpack at 1646hrs it was driven off from the parking spot it was parked in at 1440hrs. It appeared that SID [Redacted - RCMP] drove it off at 1607hrs. She was by herself. It appears that it the same vehicle involved in both cases and it appears it was driven by SID [Redacted - RCMP].

Footage saved onto X drive/March/Other/12-12914.

Dejan JANKOVIC
GPEB # 24617

SP20120033279 Attached by ralderson on [Redacted - RCMP] 13:50

Description

[Redacted - RCMP]

Incident noted. Further review to be conducted. Vehicle added to I-trak and iLPR as not previously recorded. R/O details not known. Apparent that there was two cash drop offs by the two Asian females.

SID [Redacted - RCMP] has \$185K in B/I and \$179K in dis. Last LCT was 6th Jan 2012 at STAR.

Received warning card for chip pass on that date with other female named in this file SID # [Redacted - RCMP]

[Redacted - RCMP] who is apparent driver.

SID # [Redacted - RCMP] has \$74K in B/I and \$63K in dis. Last LCT was 6th Jan 2012 as noted above.

Both [Redacted - RCMP] are sitting on 1 warning card each and have no previous STR reports.

SID [Redacted - RCMP] has \$12 Million in B/I and \$5.7 million in Dis. He has 16 sus files on Itrak [Redacted - FINTRAC]

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

SP20120033279 Attached by ralderson on [Redacted - RCMP] 13:50

SP2012003327

9 - Continued-

- 1430 hrs - Reviewed footage with Dejan JANKOVIC. On route to Surveillance writer noted that [Redacted - RCMP] were in Salon Prive and seated at one of tables. Both appeared to have minimal amount of chips. [Redacted - RCMP] was not present. Requested Surveillance monitor both persons as I wanted to speak to them before they left.

Footage was accurate to surveillance supplemental.

Footage quite clearly shows the last two buy ins were a result of cash drop offs to the total of \$380K. These money transfers took place on Casino property right outside the main East entrance near the valet. Also confirmed that [Redacted - RCMP] appears to be main driver of vehicle and it is confirmed that she is driving vehicle at 1646 hrs as shortly after she parks vehicle in South Parkade and walks back to Salon Prive. Writer observed that neither [Redacted - RCMP] played with [Redacted - RCMP] but observed him play. This behaviour is a classic indicator of Loan Sharking.

Writer called G/M Rick DUFF from Surveillance and detailed to him what he had just observed and requested if possible that a private room be put aside so Investigator could speak to both women to ascertain their relationship to [Redacted - RCMP] talk about the cash drop offs and subsequently issue warning cards if required.

Private Room # MDB 13 was used and at 1445 hrs [Redacted - RCMP] came into the room. Also present were BCLC BEEKSMA, G/M Rick DUFF and David, GCC Guest Services who assisted with translating when required.

I introduced myself, showed my ID, explained who I was and stated that I wished to ask her some questions pertaining to [Redacted - RCMP]. She agreed and we had the following conversation.

I/S "As I said I would like to speak to you about the events of [Redacted - RCMP] which was last Tuesday."

S/S "Ok."

I/S " Firstly can you tell me if you know this man?" (Showed her photo of [Redacted - RCMP])

S/S "Yes."

I/S " Can you tell me his name?"

S/S [Redacted - RCMP]

I/S " What is your relationship to [Redacted - RCMP]?"

S/S " He is a friend, known him for 2 years, met at River Rock."

I/S " I would like to talk to you about [Redacted - RCMP] and a day earlier in the week, do you know what day I am talking about?"

S/S " I am here every day."

I/S " [Redacted - RCMP]"

S/S " Ok."

I/S "On Tuesday [Redacted - RCMP] you were involved in a delivery of cash to [Redacted - RCMP]. He was handed a duffle bag of money on two occasions which contained \$380K in cash. This cash came out of a [Redacted - RCMP] which you were in. What can you tell me about that?"

S/S " I don't know."

I/S " Can you tell me where the money came from?"

S/S " I don't know where that money came from?"

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

SP20120033279 Attached by ralderson on [Redacted] 13:50

SP2012003327

9 - Continued-

I/S "Sorry can you confirm that, where did the money come from, It must have come from somewhere?"

S/S "I don't know."

At this point in time G/M DUFF interrupted and requested the interview be stopped and [Redacted] left the room. After a brief discussion between myself and DUFF the interview process reconvened and this time I asked that [Redacted - RCMP] come in.

1500 hrs - [Redacted] came into room and we had the following conversation after introductions.

I/S "Firstly can you tell me if you know this man?" (Showed her photo of [Redacted])

S/S "Yes."

I/S "Can you tell me his name?"

S/S [Redacted]

I/S "What is your relationship to [Redacted - RCMP]?"

S/S "He is a friend, known him for 1 year, we met at River Rock."

I/S "I would like to talk to you about [Redacted - RCMP], this week. You recall you were here at [Redacted - RCMP]?"

[Redacted - RCMP]

S/S "Yes."

I/S "How did you get to the Casino that day?"

S/S "I got a phone call at home from [Redacted] who asked me to do a favour and pick up some money from someone near the Bay at Richmond Centre [Redacted] was also at my house, [Redacted] daughter and my daughter a good friends.

I/S "So what happened after the phone call?"

S/S "I drove to Richmond Centre near the Bay.

I/S "Who did you pick the money up from?"

S/S "An Asian male. It was in the Parking lot [Redacted] called me again when I was there to give me instructions. In the parking lot was a [Redacted] and I was told when the lights were flashed to go and get a bag of cash.

I/S "Did you think this was unusual?"

S/S "Maybe [Redacted - RCMP] company transferred the cash from his company."

I/S "Did you know this man?"

S/S "No, he was a Chinese man. He gave me a backpack of cash."

I/S "What time was this roughly?"

S/S "3 PM."

I/S "How many times did you pick up cash for [Redacted]?"

S/S "Just once."

S/S "I don't know."

I/S "Who owns the [Redacted - RCMP] you were driving?"

S/S "I do."

I then thanked her for her assistance and informed her about the policy of cash and chip passing on Casino policy. She acknowledged the first card she had received from Starlight also and that this was her second card.

Shortly after I asked [Redacted] to return which she did.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

SP20120033279 Attached by ralderson on [Redacted - RCMP] 13:50

SP2012003327

9 - Continued-

I then asked her what vehicle she drove?

S/S [Redacted - RCMP]

I/S " Before I wrap this up I just want to clarify with you about the cash as this may result in you being barred from the Casino. Could you tell me again where you got the money?"

S/S " I don't know where the money came from."

I thanked her for her time and for talking to me. I issued her a second warning card also and asked if she had a cell number I could call her on as i would have to discuss this matter further within my organization. She provided her cell to me.

I told her she would be allowed to continue to play that day and that I would most likely finalize my report early next week.

1530 hrs - Completed and signed my notes of interview in my BCLC day book

1535 hrs - Discussed further with G/M DUFF and BCLC BEEKSMA in the BCLC Office.

1545 Hrs - Called Casino A/M KARLOVCEC and informed. I recommended that [Redacted - RCMP] be given verbal warning as 1st offence and that the G/M do so to educate his real players. I recommended that as [Redacted - RCMP] was reasonably cooperative that the second warning card was sufficient however that [Redacted - RCMP] receive a 6 month ban for inappropriate transfer of cash. Her explanation of not knowing is unreasonable and the whole incident has an element of commerciality and criminality (regarding the source of funds being a transfer in a parking lot)

- Notified G/M of same via email and that I would contact [Redacted - RCMP] myself on Monday to inform once the docs had been done.

- [Redacted - RCMP] had their profiles updated and were placed on watched

[Redacted - RCMP]

Incident written up.

- 1230 hrs - R/O received back from IPOC. Vehicle [Redacted - RCMP]

[Redacted - RCMP]

[Redacted - RCMP]

This person was not previously on I-Trak and has been added to same.

- 1400 hrs - GPE Don KIRKLAND on site. Discussed this file with him.

- 1425 hrs - Barring request for [Redacted - RCMP] sent to BCLC PLANTE for approval. [Redacted - RCMP]

SP20120034922 Attached by tomlante on [Redacted - RCMP] 15:30

Description [Redacted - RCMP] Request was received for a six (6) month Provincial Barring on patron identified as [Redacted - RCMP] A review of this file, writer concurs with BCLC Investigator ALDERSON's request.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120012914

SP20120034922 Attached by tomlante on [Redacted - RCMP] 15:30

SP2012003492

2 - Continued-

T. PLANTE BCLC
Casino Investigations

SP20120034948 Attached by ralderson on [Redacted - RCMP] 16:15

Description [Redacted - FINTRAC] Copy to IPOC and GPE BARBER and KIRKLAND

SP20120035184 Attached by ralderson on [Redacted - RCMP] 09:35

Description [Redacted - RCMP]

- 0930 hrs - [Redacted - RCMP] contacted by Investigator and advised of barring. [Redacted - RCMP] still denied knowledge of where the money came from and stated "she was just sitting in the car"

I told her that was unreasonable considering she handed over the bag to [Redacted - RCMP] and therefore must have some prior knowledge of what she was handing over.

No further action required at this time.

R.ALDERSON
BCLC SECURITY

SP20120038291 Attached by dlay on [Redacted - RCMP] 10:30

Description On gaming day [Redacted - RCMP] was approached by Executive Host Lisa GAO #31224 in which she explained the cash passing policy in detail. [Redacted - RCMP] acknowledged he understood the policy after the conversation was concluded.

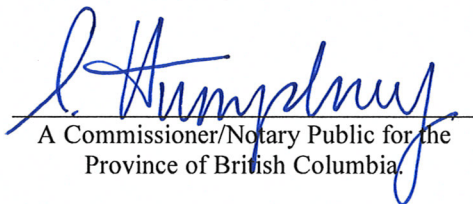
Daniel Lay
#21619
Assistant General manager

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "H"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20120015337

Date/Time Occurred:	<div>Redacted - RCMP</div>	6:47 PM	Record Creation Details	
Day of Week Occurred:			Department:	Surveillance
Date/Time Created:		6:47 PM	Owner:	agoodrich
Date/Time Closed:		3:49 AM	Operator ID:	agoodrich
Closed By:	Iwan		Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position:	
			Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Back of House-River Rock (GCC)

Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20120289457

Type: Large Cash Transaction

Specific: Unusual Activity

Category:

Incident Status: Closed

Synopsis: m40 cd 19 cash counter used for 90k b/i (LCT 43841)

Checklist: - Section 86 Form

Narrative:

Redacted - FINTRAC

Created On	Created By	Modified On	Modified By
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Executive Brief:

Participants Involved:

Personnel

Full Name:	WAN, Louis Wai Ip	Property:	River Rock (GCC)
Role:	Documenter	Department:	Surveillance

Subject

Full Name:	<div>Redacted - RCMP</div>	Company:	<div>Redacted - RCMP</div>
Role:			

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

Supplemental Entries:

SP20120039519 Attached by lwan on [Redacted - RCMP] 22:22

Description Surveillance was informed by Cage of a large buy-in with small bills at CD 19 by [Redacted - RCMP] at 1845 hrs.

Review shows [Redacted - RCMP] arrive in south parkade alone with a orange and brown bag (no vehicle info obtained) at 1841 hrs. He enters Salon Prive and cage lounge for buy-in at 1843 hrs. He empties the bag and puts bundles of various bills (later known as 600 x \$5K, 100 x \$20's, 1698 x \$50's & 1 x \$100 for a total of \$90K) on counter at CD 19. A buy in slip was brought to MDB 24 at 1852 hrs where [Redacted - RCMP] was sitting at and he receives 10 x \$5K & 40 x \$1K in chips at 1854 hrs. He was seen talking to the dealer all the way until 1920 hrs without playing on MDB 24. He bets a couple of hands between 1920 & 1925 hrs. He was seen talking to the dealer again and leaves the table shortly twice but his chips were still on the table. He begins to play big at 2005 hrs with his \$5K chip.

Footage saved to X [Redacted - RCMP] /other/12-15337.sdc

L WAN
25549

SP20120039774 Attached by ralderson on [Redacted - RCMP] 14:16

Description [Redacted - RCMP] -

- 1310 hrs - Footage viewed and confirmed as accurate except denominations of bills which writer confirmed as:

300 x \$10 for \$3K
100 x \$20 for \$2K
1698 x \$50 for \$84,900
2 x \$100 for \$200

Total \$90,100.00

[Redacted - RCMP] is alone throughout process and writer reviewed his play until 2010 hrs and nothing suspicious was noted. The buy in is deemed suspicious due to he large amount of small bills used.

MORE TO FOLLOW: Requested further footage as Writer reviewed further LCT history for [Redacted - RCMP] [Redacted - RCMP] for [Redacted - RCMP] and discovered there was a buy in prior to this one with small bills. [Redacted - RCMP] then cashed out soon after. Details on following JANKOVIC supplemental.

SP20120039807 Attached by djankovic on [Redacted - RCMP] 15:20

Description At approximately 1500hrs surveillance was informed of a another buy in for [Redacted - RCMP] by BCLC ALDERSON that he wanted to be reviewed.
Buy in occurred at 1347hrs at MDB 24 and consisted of \$5, \$10 and \$20 bills.. Upon receiving chips at 1351hrs patron played few hands on the table and then decided to leave. He cashed out

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120039807 Attached by djankovic on [Redacted - RCMP] 15:20

SP2012003980

7 - Continued-

at CD 12 main cage at 1407hrs for 11K and received all \$100 bills for it. At 1411hrs he could be seen leaving the site via salon prive exit. It should be noted that he left 10K in chips at MDB 24 for which he returned at approximately 1845hrs and continued gaming.

Additional footage of this patron buying in at CD 19 saved into existing folder.

Dejan JANKOVIC
GPEB # 24617

SP20120040713 Attached by ralderson on [Redacted - RCMP] 11:39

Description

[Redacted -] -

Summary:

[Redacted - RCMP] Buy in and disbursement details for [Redacted -]. Details gained from LCT

- 1351 hrs at MDB 24 [Redacted -] receives chips for his \$19,985.00 K buy in. The buy in was conducted at Salon Prive Cash Cage just prior at approx 1340 hrs. The buy in consisted of \$16,740.00 in \$20 bills (837 x \$20) \$3,050 in \$10 bills (305 x \$10) and \$195 in \$5 bills (39 x \$5) TOTAL \$19,985.00.

Upon receiving chips at 1351hrs [Redacted -] played a few hands on the table and then decided to leave. He left the Salon Prive, walked downstairs to the main cage (CD12) and cashed out at 1407hrs for 11K [Redacted -] received all \$100 bills for it. At 1411hrs he could be seen leaving the site via salon prive exit. [Redacted -] left \$10K in \$1K chips at MDB 24 for which he returned at approximately 1845hrs and continued gaming with.

1841 hrs - [Redacted -] arrives in south parkade alone with a orange and brown bag (no vehicle info was able to be obtained) at 1841 hrs. He enters Salon Prive and cage lounge for buy-in at 1843 hrs.

300 x \$10 for \$3K
100 x \$20 for \$2K
1698 x \$50 for \$84,900
2 x \$100 for \$200

Total \$90,100.00

A buy in slip was brought to MDB 24 at 1852 hrs where [Redacted -] was sitting at and he receives 10 x \$5K & 40 x \$1K in chips at 1854 hrs. As per his previous buy in he also has \$10K in \$1K chips left on the table.

He bets a couple of hands between 1920 & 1925 hrs. He was seen talking to the dealer again and leaves the table shortly twice but his chips were still on the table. He begins to play big at 2005 hrs with his \$5K chip.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120040713 Attached by ralderson on Redacted - RCMP 11:39

SP2012004071

3 - Continued-

Redacted - is alone throughout process and writer reviewed his play until 2010 hrs and nothing suspicious was noted with his play on the second occasion however due to what occurred with first buy in writer will review further.

Redacted - actions after his first buy in are highly suspicious. He came with small bills and instead of cashing out at the same cage he left the room and went downstairs to another cage to possibly avoid detection. He was given \$11K in \$100 bills however when he returned later that day he bought in using only 2 x \$100 bills. This behaviour is highly suspicious and is a high indicator of money laundering.

- 1445 hrs - Writer discussed this with BCLC KARLOVCEC.

- 1500 hrs - Call made to Redacted - by writer. No answer. Voice mail left asking Redacted - to contact Investigator.

- Redacted -

- 1224 hrs - Email to Surveillance manager requesting review of Redacted - play between second buy in at 1855 hrs and cash out at 2100 hrs.

Details received and Writer reviewed Redacted - play on Redacted - which has been added to writer's supplemental on that date.

R.ALDERSON
BCLC SECURITY

SP20120040954 Attached by ktighe on Redacted - 00:32

Description Further review of Redacted - play between 20:05 and 21:00 shows Redacted - playing relatively minimally with an average of bet of \$1K. He occasionally makes a \$5K bet approximately 5 times during that hour of play. Also of note is the majority of hands were Dummy (free hands). At 21:00 Redacted - RCMP approached CD 19 VIP Cage and cashes out.

Footage saved SDC Redacted - RCMP other/12-15337 200-2100 play and cash out.

K. TIGHE 35680

SP20120041087 Attached by ralderson on Redacted - RCMP 08:57

Description Redacted - RCMP

Updated supplemental and comments noted regarding Redacted - RCMP play. Extra footage was then viewed with following observations:

- 1334 hrs - Redacted - arrives in Salon Prive with a pink/red plastic bag. He is alone and wearing a black jacket and brown trousers.

- He empties bag and it contains the \$19,985.00 which was initially documented as \$20K and paid to the player as \$20K. Buy in consisted of \$16,740.00 in \$20 bills, \$3050 in \$10 bills and \$195 in \$5 bills.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041087 Attached by ralderson on [Redacted - RCMP] 08:57

SP2012004108

7 - Continued-

- 1351 hrs - He receives his chips at MDB24 as 20 x \$1K chips.

Between 1351 hrs and 1357 hrs he is actively talking to the dealer and does not play a single hand although he receives a number of dummy hands.

- 1357:16 hrs Makes his first bet for \$2K which he loses. Down to \$18K.

- 1357:54 hrs - Makes a \$2K bet and wins. Back to \$20K.

[Redacted - RCMP] then continues to talk to dealer and does not play any further hands. At 1401:36 hrs he gets up from table and he leaves \$9K in value chips on the table (9 X \$1K chips). He colours up the remaining \$11K (2 x \$5K chips and 1 x \$1K) and leaves the Salon prive. He walks down to the main floor of the Casino and at 1405:23 he cashes out the \$11K at the Main cash cage and receives \$11K in \$100 bills.

1407 hrs - [Redacted - RCMP] receives his cash from cage.

1409 hrs [Redacted - RCMP] goes back up to Salon Prive. Sits in lobby and makes a phone call, goes back to MDB 24 and takes his water bottle and then leaves the site. The 9 x \$1K chips are left on the table. [Redacted - RCMP] is off site for approx 4.5 hours.

Of that \$20K buy in [Redacted - RCMP] put \$4K at risk.

1843 hrs - [Redacted - RCMP] returns to site as previously documented. Conducts buy in.

300 x \$10 for \$3K

100 x \$20 for \$2K

1698 x \$50 for \$84,900

2 x \$100 for \$200

Total \$90,100.00 although documented by site as \$90K. Of note although he was paid \$11K in \$100 bills only 4.5 hrs earlier he chose not to use these as his buy in.

- 1853hrs [Redacted - RCMP] receives the value chips from his \$90K buy in

He receives 10 X \$5K chips and 40 X \$1K chips. Upon receipt of these chips [Redacted - RCMP] has the original \$9K in chips in front of him.

[Redacted - RCMP] organizes the \$90K received off to his right near the bumper of the table (he's playing alone) [Redacted - RCMP] puts the chips in stacks of 5 (8 X 5 X \$1K's and 2 X 5 X \$5K's) and begins to play with the \$9K chips from earlier Of note [Redacted - RCMP] does not make his first bet until 1923 hrs, approx 30 mins after receiving his chips. Writer reviewed his play until he left the site. All play involved the original \$9K and his \$90K buy in was relatively untouched except on a couple of occasions which he takes some chips and then tops back up as writer notes later.

1923 hrs - 1st bet \$1500 approx. LOSE

1924 hrs - Bet \$1K WIN

1944 hrs - leaves table

1948 hrs - Back at table

1957 hrs - Leaves table

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041087 Attached by ralderson on [Redacted RCMP] 08:57

SP2012004108

7 - Continued-

2004 hrs back at table

2005:18 hrs - Makes \$1K bet LOSE

2005:59 hrs - Makes \$1K bet WIN

2006:45 hrs - Makes approx \$1100 bet LOSE

2008:24 hrs Makes approx \$1100 bet LOSE

2009:10 hrs - Makes \$1K bet LOSE

2009:50 hrs - Makes a \$5-\$6K bet LOSE

2010:26 hrs - Makes a \$5K bet WIN

2012:59 hrs - Makes a \$2K bet WIN

2013: 26 hrs - Makes a \$1K to \$2K bet WIN

2015 hrs - Checks his stack off to side and looks like he is counting it.

2016 hrs - Leaves table

2017 hrs - Back to table with food. He still has his \$90K off to side and has approx \$15K in chips front of him in a totally separate pile.

2022 hrs - Makes \$1K to \$2K bet WIN

2024 hrs - Leaves table

2025 hrs - Back at table

2026 hrs - Leaves Table

2031 hrs - Back at table

2032:50 hrs - Makes a \$6K to \$7K bet. LOSE

2033:50 hrs - Makes a \$5K bet. WIN

2034:40 hrs - Makes a \$1K to \$2K bet LOSE

2035 hrs - Leaves table. his balance is still the \$90K off to side and \$11K chips in front of him.

2039:59 hrs Back at table and a new deck is cut.

2040:25 hrs - Makes \$2K bet (TIE?)

2041:06 hrs \$2K bet WIN

2043 hrs - leaves table

2047 hrs - Back at table

2047:25 hrs - Makes \$1K to \$2k bet LOSE

2048:10 hrs - Makes \$2-3K bet LOSE

2049:34 hrs - Makes \$3K bet LOSE

2050:23 hrs - Makes \$5K bet (At this time he has approx \$10K in front of him and the \$90K off to side) WIN

2051:03 hrs - 1 x \$1K bet (takes from \$90K) WIN

2052 hrs Leaves table for 30 seconds

2053 hrs - Leaves table

2055 hrs - Back at table

2055 hrs - makes approx \$1,100 bet WIN

2058 hrs - Colours up and cashes out for \$108,170.00 in which he receives \$100 bills.

As stated [Redacted] does not touch the \$90K except for the following circumstances

- 2010 hrs - [Redacted] places a bet consisting of 2 X \$1K chips. He then retrieves what appears to be 3 X \$1K chips from his \$90K to bring the bet up to \$5K. He then returns the 3 X \$1K and takes 1 X \$5K which is bet and won. Once he receives the payout for the winning \$5K he replaces the 1 X

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041087 Attached by ralderson on [Redacted - RCMP] 08:57

SP2012004108

7 - Continued-

\$5K he'd taken from the \$90K and continues playing with the \$5K chip received from the payout and whatever smaller denomination chips received, already had.

- 2050 hrs [Redacted] has approx 2 X \$5K chips in front of him. He wagers 1 X \$5K on the next hand which wins. [Redacted] then removes 1 X \$1K chips from the \$90K which he uses to cover the commission on the winning \$5K Banker hand.

- 2051 hrs [Redacted] removes approx 3 X \$1K chips from his \$90K betting it.

- 2054 hrs [Redacted] has won a little and adds approx 3 X \$1K chips to his \$90K bringing it back up to an even \$90K.

- 2059hrs [Redacted] "colours up" 40 X \$1K chips and 2 X \$500 chips receiving 8 X \$5K chips and 1 X \$1K chip.

[Redacted - RCMP] only put \$7K of his \$90K buy in at risk.

SUMMARY:

Writer reviewed [Redacted - RCMP] play extensively and he did not appear to be putting significant amounts at risk. Average bets were acceptable or normal amounts (\$1K to \$5K) however he wasn't betting regularly and clearly avoided having to use the \$90K he had set aside. [Redacted] was seen speaking with the dealer often, eating food, requesting "dummy Hands" etc. The hands per hour dealt was significantly less than what would be considered normal.

Additionally it appeared to the writer [Redacted] did not want to use the \$90K. On the few occasions he did it was out of necessity (he was low on chips) and as soon as he was able to; he replenished whatever he'd taken.

Writer spoke to BCLC BEEKSMA and asked to review footage of play as well to get a second opinion on the matter due to the patron being a high profile patron at RRCR. Writer has reviewed this patron's play a number of times due to similar concerns however his play has been enough to justify his buy ins in the past. However if the patron's history is disregarded, the fact of the matter is on [Redacted - RCMP] he bought in for approx \$110K in mixed small bills. He played 22 hands in approx 3 hours at the table and of the \$110K he put at risk a total of \$16K.

Adding to this the details surrounding his \$20K buy in earlier (buy in small bills, cashed out \$11K immediately at another cashier cage receiving \$100's) [Redacted - RCMP] behaviour this date is highly suspicious. Additionally having cashed out earlier receiving \$11K in \$100's and returning later to conduct a \$90K buy in small bills again adds to the suspicion that [Redacted] is displaying indicators of money laundering or "refining" whether it be for himself or, more likely for an unknown associate.

On [Redacted] writer contacted GPE BARBER to discuss and BARBER will attend RRCR on [Redacted]

[Redacted]

[Redacted] is a well known patron at RRCR who has a few odd gambling habits. He has been warned before about leaving chips behind and is known to cash out soon after a buy in if he does not feel

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041087 Attached by ralderson on [Redacted - RCMP] 08:57

SP2012004108

7 - Continued-

lucky. On occasion he will then attend another site. Usually however he will buy in with whatever bills he receives and nothing as apparently blatant as what occurred on [Redacted -]. He has been investigated before by BCLC Investigators including this writer and nothing suspicious was found with his play.

[Redacted - RCMP] has a total of \$12.2 million in buy in's. \$1.4 million of which have been bank drafts through a PGF account. His total cash outs minus buy's from his PGF total \$5.2 million. This would tend to indicate he has suffered mostly losses, not typical of someone who is trying to launder money. Of course this does not cover any chips he may have left with.

Redacted - FINTRAC

[Redacted -] On each occasion no issues relating to his play or possibly laundering small bills was reported. [Redacted -] received a 1 year BCLC barring in [Redacted -] for continued chip passing with fellow players. This was more about his disregard for Fintrac LCT reporting guidelines that suspected Loan sharking.

[Redacted - RCMP] has a BC D/L (Canadian Resident). He gives his occupation as a [Redacted - RCMP].
[Redacted -] No info can be found on this company via internet searches.

As of [Redacted - RCMP] has not been back to RRRC since Writer voice mail. He has attended Edgewater Casino.

[Redacted - RCMP]

- 1330 hrs - GPE BARBER attended BCLC RRRC Office and writer provided him with a copy of this report and the matter was discussed. Writer suggested a joint interview with BCLC and GPE of [Redacted -] and the details of [Redacted - RCMP] put to him. Writer stated to BARBER he is of opinion that although this will be reported to Police [Redacted - FINTRAC] because of the buy in and that suspected money laundering has been identified as the suspected laundering had been identified "within the Casino" then there may be a responsibility to take action with the patron other than just reporting it. Writer believes the public expectation would be to do so and that without any further course of action by either BCLC or GPE then that may have an adverse public or media effect on RRRC, BCLC and GPE should the details of this case ever be made available through FOI or highlighted in a Fintrac audit. BARBER to discuss with GPE management and will contact writer [Redacted -] with the GPE stance.

SP20120041276 Attached by sbeeksma on [Redacted - RCMP] 13:41

Description

On the above date the writer was requested by BCLC ALDERSON to review [Redacted - RCMP] play from the point of receiving chips from his second buy in this date (\$90K). [Redacted -] has been well documented as a regular VIP patron in BC Casinos however on this date he displayed more than one indicator of suspicious activity as it relates to money laundering (specifically refining smaller denomination cash into large denomination).
Because of [Redacted - RCMP] high profile patron status the writer concurred that a second set of eyes may be beneficial.

[Redacted - RCMP] had a \$20K buy in earlier this date (all \$20's \$10's and \$5 bills occurring in the 3rd floor VIP salon). Following this earlier buy in [Redacted -] takes \$11K of the chips received and cashes out at the main cage being paid out in \$100 bills. He leaves \$9K in value chips on the table (9 X \$1K chips) and leaves the site for approx 4 hours.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041276 Attached by sbeeksm on [Redacted - RCMP] 13:41

SP2012004127

6 - Continued-

The following observations were made by the writer from the point of [Redacted - RCMP] return:

-At approx 1853hrs [Redacted - RCMP] receives the value chips from his \$90K buy in (cash tendered was a combination of CDN \$50, \$20 and \$10 bills and 2 X \$100).

He receives 10 X \$5K chips and 40 X \$1K chips. Upon receipt of these chips [Redacted - RCMP] has approx \$9K in chips in front of him (likely the a/m chips from his earlier buy in) that he'd likely been gambling with while cashiers counted the \$90K. The \$90K in chips were never mixed with [Redacted - RCMP] existing chips.

[Redacted - RCMP] organizes the \$90K received off to his right near the bumper of the table (he's playing alone). [Redacted - RCMP] puts the chips in stacks of 5 (8 X 5 X \$1K's and 2 X 5 X \$5K's) and begins to play with the chips from earlier, leaving the \$90K relatively untouched with a couple exceptions.

-At approx 2010hrs [Redacted - RCMP] places a bet consisting of 2 X \$1K chips. He then retrieves what appears to be 3 X \$1K chips from his \$90K to bring the bet up to \$5K. He then returns the 3 X \$1K and takes 1 X \$5K which is bet and won. Once he receives the payout for the winning \$5K he replaces the 1 X \$5K he'd taken from the \$90K and continues playing with the \$5K chip received from the payout and whatever smaller denomination chips received, already had.

-At approx 2050hrs [Redacted - RCMP] has approx 2 X \$5K chips in front of him. He wagers 1 X \$5K on the next hand which wins. [Redacted - RCMP] then removes 1 X \$1K chips from the \$90K which he uses to cover the commission on the winning \$5K Banker hand.

-At approx 2051hrs [Redacted - RCMP] removes approx 3 X \$1K chips from his \$90K betting it.

-By approx 2054hrs [Redacted - RCMP] has won a little and adds approx 3 X \$1K chips to his \$90K bringing it back up to an even \$90K.

-At approx 2059hrs [Redacted - RCMP] "colours up" 40 X \$1K chips and 2 X \$500 chips receiving 8 X \$5K chips and 1 X \$1K chip.

[Redacted - RCMP] then cashes out for \$108,170 being paid out in cash (\$100 bills).

Conclusion:

Of the approx 2 hours of [Redacted - RCMP] play reviewed he did not appear to be putting significant amounts at risk. Average bets were acceptable or normal amounts (\$1K to \$5K) however he wasn't betting regularly and clearly avoided having to use the \$90K he had set aside. [Redacted - RCMP] was seen speaking with the dealer often, eating food, requesting "dummy Hands" etc. The hands per hour dealt was significantly less than average.

Additionally it appeared to the writer [Redacted - RCMP] did not want to use the \$90K. On the few occasions he did it was out of necessity (he was low on chips) and as soon as he was able to; he replenished whatever he'd taken.

Adding to this the details surrounding his \$20K buy in earlier (buy in small bills, cashed out \$11K immediately at another cashier cage receiving \$100's) [Redacted - RCMP] behaviour this date is highly suspicious. Additionally having cashed out earlier receiving \$11K in \$100's and returning later to

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120015337

SP20120041276 Attached by sbeeksma on [Redacted - RCMP] 13:41

SP2012004127

6 - Continued-

conduct a \$90K buy in (a combination of CDN \$50, \$20 and \$10 bills and 2 X 100) adds to the suspicion that [Redacted] is displaying indicators of money laundering or "refining" whether it be for himself or, more likely for an unknown associate.

Above details passed on to BCLC's ALDERSON to assist in concluding this file.

S.BEEKSMA

BCLC

Casino Investigations

SP20120041871 Attached by ralderson on [Redacted - RCMP] 16:03

Description [Redacted - FINTRAC] Copy to IPOC and GPE BARBER and KIRKLAND. Saved under x: Money laundering folder

SP20120042371 Attached by djankovic on [Redacted - RCMP] 17:34

Description Evidence cabinet opened in order to burn the copy of the incident for GPEB BARBER. DVD # 1057/1058 burned and sealed in a evidence bag # NN1770942 for BARBER's future pick up.

Dejan JANKOVIC

GPEB # 24617

SP20120045576 Attached by djankovic on [Redacted - RCMP] 13:45

Description DVD's Picked up by BARBER.

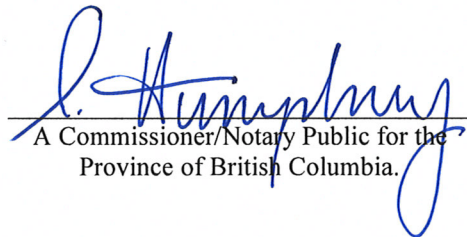
Dejan JANKOVIC

GPEB # 24617

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "I"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd

A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20120016413

Date/Time Occurred:		Record Creation Details	
[Redacted] 00 PM		Department:	Gaming Operations
Day of Week Occurred:		Owner:	annchu
[Redacted - RCMP] 16 PM		Operator ID:	sroddick
Date/Time Created:		Operator Name:	
Date/Time Closed:		Personnel ID:	
Closed By:		Card Number:	
dtrajkovic		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Back of House-River Rock (GCC)

Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20120309115

Type: Large Cash Transaction

Specific: Unusual Activity

Category:

Incident Status: Closed

Synopsis: C/S Nolan - \$ 100K B/I (\$ 20s). SID 43841 to MDB 23. M 29

Checklist: - Section 86 Form

Narrative: [Redacted - ENTRAC]

Created On **Created By** **Modified On** **Modified By**

Executive Brief:

Participants Involved:

Personnel

Full Name: DEMPSEY, Jack D. **Property:** River Rock (GCC)

Role: Documenter **Department:** Surveillance

Subject

Full Name: [Redacted - RCMP] **Company:** [Redacted - RCMP]

Role: [Redacted - RCMP]

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016413

Supplemental Entries:

SP20120042261 Attached by jdempsey on [Redacted - RCMP] 13:46

Description [Redacted - RCMP] bought in \$99,980 with 9999 \$20 bills at CD 19 and received his chips on MDB 23. He was playing an average bet of approx \$4,000 until BCLC investigator Ross ALDERSON interviewed him at MDB 15 private room. After the interview [Redacted - RCMP] left \$103,900 in chips on MDB 23 then left the casino.

12:46 Enter S-PLOT in a White SUV

12:47 Enter Salon room then CD 19

12:59 Buy in started

13:17 Receive chips at MDB 23

13:47 F/M Oscar and VIP Host Clara CHAN escorted [Redacted] to MDB 15 private room for interview

Saved to X: April / Other.

J.DEMPSEY 23874

SP20120042286 Attached by ralderson on [Redacted - RCMP] 14:37

Description Incident noted.

1330 hrs - GPEB BARBER attended BCLC office to discuss a time to interview [Redacted] re his buy in on [Redacted] which had been a file reviewed by GPE. It was then noted that [Redacted] was on site. ALDERSON attended Salon Prive and discussed with A/G/M Daniel LAY that writer would like a quick word with [Redacted] to arrange another appointment. It was made clear that [Redacted] was allowed to further gamble once that had taken place.

1345 hrs - [Redacted] attended private room in Salon Prive on request from GPEB BARBER and BCLC ALDERSON. ALDERSON asked [Redacted] if he would be available to attend an interview at BCLC Vancouver Office. [Redacted] was under impression that he was to be interviewed that day and could not do so because he had to leave by 2 pm. ALDERSON stated to [Redacted] that he did not wish to take up too much of his time and that today he was free to gamble as long as he wanted. ALDERSON stated that he wished to discuss events of [Redacted - RCMP] with [Redacted] and [Redacted] agreed to attend BCLC Vancouver Office at 10 am on Thursday [Redacted - RCMP] Guest Services translated. ALDERSON asked [Redacted] if he had a phone number he could be contacted on as the number on file appeared to be a wrong number. [Redacted] stated he did not and looked at his watch and said he had to leave as it was close to 2pm. ALDERSON thanked him for his time and stated he would see him tomorrow.

ALDERSON then left Salon Prive. On return to the Office GPE BARBER, BCLC LEE and BCLC BEEKSMA were reviewing live monitoring of the Salon Prive cash cage where [Redacted] was now cashing out. It appeared the cage were going to pay back his buy in with \$100 bills. ALDERSON called Surveillance and requested he be paid back his buy in with \$20 bills due to money laundering concerns stemming from the [Redacted - RCMP] incident.

ALDERSON was referred to G/M DUFF and a phone conversation took place. By that time [Redacted] had left site leaving approx \$110K of chips on the table. As a result A/G/M LAY stated to ALDERSON that should [Redacted] return he will be paid back his original buy in with \$20 bills.

ALDERSON finds it unusual that [Redacted] volunteered he had to leave by 2 pm (which he repeated

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016413

SP20120042286 Attached by ralderson on [Redacted - RCMP] 14:37

SP2012004228

6 - Continued-

a number of times) when he only just bought in for a \$100K. ALDERSON notes the supplemental from DEMPSEY regarding his play and the play was also observed by BCLC BEEKSMA and LEE. A full review of his play has been requested.

SP20120042287 Attached by dlay on [Redacted - RCMP] 14:56

Description

The writer spoke with BCLC Investigator Ross ALDERSON in regards to interviewing [Redacted - RCMP]. A private room was provided and F/M Oscar CHOW and VIP Host Clara CHAN escorted [Redacted - RCMP] to the room and were present for translation. I was then later informed that [Redacted - RCMP] was at the Salon cage to cash out. It was decided that [Redacted - RCMP] was to be paid in twenty dollar bills as consistent with his original buy in of \$99,980 in 20's. As [Redacted - RCMP] had left the room leaving \$103,980 in chips on MDB23 the writer instructed the cage that [Redacted - RCMP] when returning was to be paid the first \$100K in twenty's whenever he proceeded with his cash out.

Daniel LAY

#21619

Assistant General Manager

SP20120042548 Attached by dtrajkovic on [Redacted - RCMP] 01:35

Description

On [Redacted - RCMP] at approx. 00:35 [Redacted - RCMP] was cashing out 31x\$5,000, 4x\$1,000, 4x\$100 and 2x\$25 for a total of \$159,450. He requested cheque for \$59,450 verified win and the rest was paid in \$20 bills and CD 19. He collected cash and cheque and left the site. Video saved in 12-16413 in Other folder.

Djordje TRAJKOVIC

23474

SP20120042730 Attached by ralderson on [Redacted - RCMP] 12:57

Description

[Redacted - RCMP]

Received update from BCLC LEE regarding [Redacted - RCMP] play between 1315 and 1400 hrs. Meeting conducted with [Redacted - RCMP] at BCLC Vancouver Office this date at approx 0915 hrs. GPE BARBER present. [Redacted - RCMP] confirmed his current personal details including address and occupation. All other details in BCLC only file opened this date by writer. [Redacted - RCMP] requested that the content of his meeting be not disclosed to Casino personnel.

[Redacted - FINTRAC]

R.ALDERSON

BCLC SECURITY

SP20120042765 Attached by stolee on [Redacted - RCMP] 14:24

Description

On [Redacted - RCMP] writer attended surveillance, met with supervisor Jack DEMPSEY and reviewed [Redacted - RCMP] play.

Detail findings has been documented in a BCLC file.

Stone LEE

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016413

SP20120042765 Attached by stolee on [Redacted -] 14:24

SP2012004276

5 - Continued-

BCLC Investigator

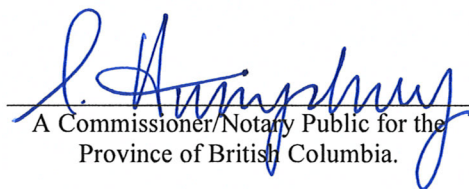
SP20120044840 Attached by ralderson on [Redacted - RCMP] 15:45

Description [Redacted - FINTRAC] submitted this date. Copy to IPOC and GPE.

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "J"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20120016586

Date/Time Occurred: [Redacted - RCMP] 1:01 PM
 Day of Week Occurred: [Redacted - RCMP]
 Date/Time Created: [Redacted - RCMP] 1:02 PM
 Date/Time Closed: [Redacted - RCMP] 2:51 PM
 Closed By: ralderson

Record Creation Details

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

Location of Incident:

Property: Vancouver (BCLC)
 Location: Corporate Security BCLC Vancouver
 Sublocation:

Details of Incident:

Daily Log #: DL20120312463
 Type: Assistance To
 Specific: BCLC
 Category:
 Incident Status: Closed
 Synopsis:
 Checklist:

Narrative:

Created On	Created By	Modified On	Modified By
[Redacted - RCMP] 1:02 PM	ralderson		
Interview of	[Redacted - RCMP]		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

Participants Involved:

Personnel

Full Name:	ALDERSON, Ross	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	Security
Full Name:	WU, Nicole	Property:	Vancouver (BCLC)
Role:	Witness	Department:	Security

Subject

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

Supplemental Entries:

SP20120042733 Attached by ralderson on Redacted - RCMP 13:06

Description Redacted - RCMP -

As per narrative on Patrons previous incident from Redacted - RCMP

Redacted - RCMP

1330 hrs - GPEB BARBER attended BCLC office at RRCR to discuss a time to interview Redacted - RCMP re: his buy in's and subsequent cash outs of \$110K on Redacted - RCMP which had been a file reviewed by GPE Redacted - FINTRAC BARBER stated that the RCMP had shown interest and they had no issue with BCLC and GPE interviewing Redacted - RCMP over the incidents of Redacted - RCMP. Writer attempted to call Redacted - RCMP however phone number on file appeared to be a wrong number.

It was then noted that Redacted - RCMP was on site. ALDERSON attended Salon Prive and discussed with A/G/M Daniel LAY that writer would like a quick word with Redacted - RCMP to arrange another appointment at the BCLC office. It was confirmed that G/M DUFF was not on site. It was made clear to LAY that Redacted - RCMP was allowed to further gamble once arrangements had been made however writer detailed it was related to suspected money laundering which occurred on Redacted - RCMP.

1345 hrs - Redacted - RCMP attended one of the private rooms in Salon Prive on request from BCLC ALDERSON. GPE BARBER and BCLC BEEKSMA and BCLC LEE observed on live monitoring

ALDERSON asked Redacted - RCMP if he would be available to attend an interview at BCLC Vancouver Office. Redacted - RCMP was under impression that he was to be interviewed that day and could not do so because he had to leave by 2 pm. ALDERSON stated to Redacted - RCMP that he did not wish to take up too much of his time and that today he was free to gamble as long as he wanted. Redacted - RCMP reiterated that he had to leave by 2 pm.

ALDERSON stated that he wished to discuss events of Redacted - RCMP with Redacted - RCMP and Redacted - RCMP agreed to attend BCLC Vancouver Office at 10 am on Thursday Redacted - RCMP Guest Services translated. ALDERSON asked Redacted - RCMP if he had a phone number he could be contacted on as the

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042733 Attached by ralderson on [Redacted - RCMP] 13:06

SP2012004273

3 - Continued-

number on file appeared to be a wrong number. [Redacted - RCMP] stated he did not wish to provide that and looked at his watch and said he had to leave as it was close to 2pm. ALDERSON thanked him for his time and stated he would see him tomorrow.

ALDERSON then left Salon Prive. On return to the Office GPE BARBER, BCLC LEE and BCLC BEEKSMA were reviewing live monitoring of the Salon Prive cash cage where [Redacted - RCMP] was now cashing out. It appeared the cage were going to pay back his buy in with \$100 bills. ALDERSON called Surveillance and requested he be paid back his buy in with \$20 bills due to money laundering concerns stemming from the [Redacted - RCMP] incident.

1405 hrs - ALDERSON was referred to G/M DUFF and a phone conversation took place. By that time [Redacted - RCMP] had left site leaving approx \$110K of chips on the table. As a result A/G/M LAY stated to ALDERSON that should [Redacted - RCMP] return he will be paid back his original buy in with \$20 bills.

ALDERSON finds it extremely unusual that [Redacted - RCMP] volunteered he had to leave by 2 pm (which he repeated a number of times) when he only just bought in 30 minutes prior for a \$100K. A full review of his play was requested and viewed by BCLC STONE that confirmed [Redacted - RCMP] of his \$100K buy in, had wagered 8 hands with the highest being a \$1,200 bet. This totally conflicts what RRRCR Surveillance shift manager DEMPSEY had initially stated to writer that [Redacted - RCMP] was consistently playing with \$4K bets. It is not known if DEMPSEY was intentionally attempting to mislead ALDERSON or did not correctly view the footage.

From the incident it is clear to this writer that there is resistance from the site to the way BCLC ALDERSON has dealt with this matter and this was emphasized by G/M DUFF in what was a rather heated phone call with writer.

DUFF's comments were:

"He's my player and he was playing until you pulled him off the table and scared him away"
 "This is my Casino not yours and if I want to pay him back in \$100's or a cheque, I will."
 "You have no right to tell my staff to pay him back in \$20's"
 "I want to know what is going on with my players"
 "I thought your job was to report this and let the real police investigate"

My responses were

I told DUFF to pay [Redacted - RCMP] how he liked and I would note it down in the file.
 I told DUFF that my job was to investigate incidents within the Casino and we have had similar reported incidents where \$20's had been returned however as this was a big player the site appeared to disregard that. I told DUFF that any discussion I had with [Redacted - RCMP] was on a need to know basis and I did not have to disclose a joint GPE and BCLC investigation to him (DUFF).
 I informed DUFF that [Redacted - RCMP] volunteered he was leaving at 2 pm, bought in for \$100K in \$20's played minimally and now wanted to cash out and get \$100's. This looks like Money laundering and is exactly the issue I wished to discuss with him at a later date. If the site wanted to assist [Redacted - RCMP] in his money laundering then that was his call as he had made it clear he ran the Casino. I made it clear that I believed the site was failing it's AML requirements today and that it was becoming a theme that BCLC Investigators were finding these issues on review and not getting

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042733 Attached by ralderson on [Redacted - RCMP] 13:06

SP2012004273

3 - Continued-

reports from Surveillance Operators or floor staff.

I also told DUFF I had no option other than to speak to the patron while in the Casino as the contact phone number he provided was incorrect. GPE had also indicated there were 3 other numbers on file which [Redacted] had told me were also out of date.

By the end of the call DUFF stated if I believed he was attempting to launder money then he will support me and pay him back with \$20's. We agreed to discuss next week after the Easter break.

BCLC LEE, BCLC BEEKSMA and GPE BARBER were present in the room at the time of that call.

Notes of that phone call were taken in Writers day book.

1425 hrs - Writer called BCLC KARLOVCEC to brief.

1428 hrs - Called Nicole WU and confirmed she would be available tomorrow to translate in Mandarin for the interview.

[Redacted - RCMP]

- 0900 hrs - Writer attended Vancouver Office and met with GPE BARBER and discussed interview plan. It was decided that BCLC ALDERSON would start with questions he had prepared and BARBER would finish off.

- 0915 hrs - [Redacted] arrived and writer met same in lobby and introduced BARBER and WU. Interview was the conducted in one of the prize winners lounges. With [Redacted - RCMP] permission the interview was audio taped on writers iPad.

Content of interview will be on a the next supplemental.

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

Description

[Redacted - RCMP]

Interview conducted with [Redacted - RCMP] Persons present [Redacted] BCLC ALDERSON, GPE BARBER and Mandarin Interpreter BCLC Nicole WU.

SUMMARY OF INTERVIEW conducted between 0915 hrs and 1030 hrs

[Redacted - RCMP] was asked to justify his play (or lack of on [Redacted - RCMP] and also why he bought in with small bills on that day and when he returned on [Redacted]

[Redacted - RCMP] made following statements during the interview.

[Redacted - RCMP] - Once I spoke to him several members of RRCR staff came up to him wanting to know what we discussed.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

SP2012004275

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[Redacted] bought in for \$20 because he only wanted to play a short time. (He initially couldn't remember what time he arrived and how much he bought in for) He left \$9K behind as 9 is a lucky number in Chinese culture. Its "feng Shuai" He left with the rest (\$11K) as they were his winnings (even though they were not) He received \$100 bills as RRCR always pays out in \$100's. It was not his intent to get rid of his small bills as far as he is concerned it is all money and he would be ok being paid back in \$20's. He couldn't remember how much he played with. He then came back with \$90K in small bills [Redacted] stated he thought it was only \$30k) He was asked why he didn't use his \$100 bills from earlier and he stated again that he stores his \$100's as it is "lucky money" as he got it from Casino. He stated he stored his \$100 bills at home.

When I asked him how much of that \$90K he bet with he said about \$30K and I confirmed with him it was only \$7K.

He was asked why he hardly touched his \$90K buy in and [Redacted - RCMP] answer was he wanted to have it there as his safety net and he would have used it if he needed it. Writer queried why he bought in when he could have waited and [Redacted] answer was again that he thought it was lucky to have the chips beside him. He then stated he was born in the year of the rabbit and it was lucky for him to bet with totals with 9 such as \$9K and \$90K. I asked him why he only played 22 hands in 2.5 hours and he stated he lost a lot the other day and wanted to minimize his losses. He confirmed he cashed out for approx \$110K (in total) on [Redacted - RCMP] and that he "stored that money" and used other money to buy in with. [Redacted] stated he did not use his PGF account as he had a bad experience at RRCR where he believed he should have got more from his PGF and that cash is easier to deal with.

He stated he was not [Redacted - RCMP] and that he mainly lived in China (although [Redacted - RCMP] states he gets his cash from the associates he trades with in China. If he needs money there they arrange that or he gives them goods and he then gets money in return in BC. He says he was in China a lot of last year until [Redacted] when he came back to BC. [Redacted] states he gets smaller bills from his associates as they are harder to counterfeit compared to \$100 bills and he doesn't mind the inconvenience of the small bills.

Writer then asked [Redacted] if he knew what money Laundering was and he rambled on for some time that what he was doing was not illegal and it was all money and that RRCR always paid back in \$100 bills whereas other sites did not. He stated he was not money laundering on behalf of anyone else and that all his buy ins' were his money. He confirmed his address as [Redacted - RCMP]. [Redacted - RCMP] He was adamant he did not want Casino staff knowing where he lived.

GPE Investigator Rob BARBER then asked further questions relating to the origin of the money and [Redacted] stated the following.

There was only a few persons he dealt with. They were all Chinese and he originally had found them through a Chinese Website: Vansky.com. There was no interest rate and he paid back with bank transfers etc.

The persons he deals with he trusts because he calls them and they meet at a mutual location. Never at their homes or his and the exchange takes place. [Redacted] stated sometimes T and T supermarket at Yaohan Centre in Richmond or more commonly the McDonalds Restaurant at

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

SP2012004275

2 - Continued-

Metro town in Burnaby. He didn't believe this was suspicious and the origin of the money was sound due to the process, eg if they didn't negotiate the price etc. This contradicts what he earlier said about interest rates. He also mentioned cash transfers in China which he also contradicted by talking about bank transfers. [Redacted - RCMP] stated he had his own banking system with separate storage for his \$100 bills ("casino winnings") and his cash he got from "associates"

[Redacted - RCMP] confirmed he had a [Redacted - RCMP] address which he didn't live in but was there as he wanted to [Redacted - RCMP] and needed to be a resident to do so.

Writer then asked if anyone from RRCR assisted him in obtaining monies and he said no. The G/M's name Rick DUFF was mentioned and the patron denied knowing him. This is unrealistic as DUFF would have comped him dinners etc.

Through the interview [Redacted - RCMP] was quite nervy, contradicted himself a number of times and most of his explanations regarding his playing patterns were not credible. However [Redacted - RCMP] never admitted to purposely laundering his money. He stated that he was happy to receive back the same bills he bought in with. Of interest [Redacted - RCMP] has LCT's for [Redacted - RCMP] whereas he stated he was in China until [Redacted - RCMP]. Once he knew what was being implicated it was interesting that he closed up entirely over staff at RRCR who had asked him about our conversation on [Redacted - RCMP] at RRCR.

Writer reviewed www.vansky.com and it is a Chinese News website with a Classified section. However it is written in all simplified Mainland China characters.

Writer located a Vansky Trading Co Ltd, suite 4 1600 Valmont Way, Richmond, BC V6V 1Y4. Ph 604-232-1155. This location is approx 5 mins from RRCR. It does not have a website however canpages states it is a grocery trader/importing company.

Of note [Redacted - RCMP] was back at RRCR on [Redacted - RCMP] and bought in for \$30K only. Denominations not known.

Redacted - FINTRAC

Writer has provided Details of this file to BCLC KARLOVCEC on [Redacted - RCMP]. Writer is concerned that RRCR management have taken it upon themselves to pay back "high Profile" patrons in \$100 bills with minimal play and are compromising AML and integrity concerns. Throughout this entire process whether it be lack of reporting, inaccurate Surveillance supplementals or the combative nature of the G/M there have been concerns to this writer about the goings on at RRCR especially in the Salon prive. Writer followed up with KARLOVCEC re gaining a video review station for BCLC which KARLOVCEC stated he would continue to follow up with GCC Surveillance Director Pat ENNIS.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

SP2012004275

2 - Continued-

[Redacted - RCMP] - 1630 hrs - Writer drove by Vansky Trading. Appears to be small warehouse.
Nothing suspicious noted.

SP20120042774 Attached by stoele on [Redacted - RCMP] 14:50

Description On [Redacted - RCMP] writer attended surveillance, met with supervisor Jack DEMPSEY and reviewed WANG's play. Surveillance footage showed on the gaming date of [Redacted -] at 1316:30 hrs patron identified as [Redacted - RCMP] arrived at MDB23.
At 1318:42 hrs [Redacted -] received 18x \$5,000 chips, 9x \$1,000 chips, 1x \$500 chip, 4x \$100 chips, 3x \$25 chips, and 1x \$5 chip for total of \$99,980 in gaming chips from the dealer.
[Redacted -] was seen wagering total of 8 hands during his play, detail of [Redacted -] play as follow;
At 1319:58 hrs [Redacted -] was seen wagering approximately \$1,000 on BANKER and lost.
At 1320 hrs [Redacted -] was seen wagering \$100 on BANKER and lost.
At 1321:18 hrs [Redacted -] was seen wagering \$1,500 on BANKER and won.
At 1332:50 hrs [Redacted -] was seen wagering \$1,100 on PLAYER and won.
At 1334:47 hrs [Redacted - RCMP] was seen wagering \$1,100 on PLAYER and won.
At 1340:40 hrs [Redacted -] was seen wagering \$1,100 on PLAYER and the hand resulted in a TIE, [Redacted - RCMP] pushed this hand.
At 1341:23 hrs [Redacted -] was seen wagering \$1,200 on PLAYER and won.
At 1345:20 hrs [Redacted - RCMP] was seen wagering \$1,200 on PLAYER and won.
At 13:47 hrs [Redacted -] was spoken to by F/M CHOW.
When [Redacted -] returned to the table he took his chips to the cage.

Stone LEE

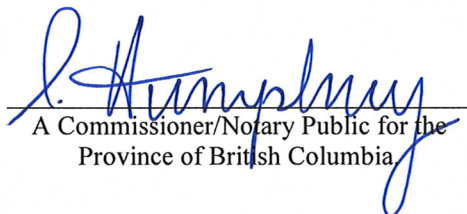
BCLC Investigator

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "K"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia

Incident File Full Report

Incident File #IN20120043848

Date/Time Occurred: 9/19/2012 1:39 PM		Record Creation Details	
Day of Week Occurred: Wednesday		Department:	BCLC Corporate Security
Date/Time Created: 9/20/2012 2:50 PM		Owner:	stolee
Date/Time Closed: 11/22/2012 9:07 AM		Operator ID:	stolee
Closed By: sbeeksma		Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

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

Details of Incident:

Daily Log #:	DL20120869485
Related Incidents:	IN20120043708
Type:	Ban
Specific:	Prohibited by BCLC
Category:	Inappropriate Behaviour
Incident Status:	Closed
Synopsis:	C/S Shelly - \$ 40K in \$ 20s from SID 118418 to MDB 23. M 39
Checklist:	

Narrative:	Created On	Created By	Modified On	Modified By
	9/20/2012 2:51 PM	stolee		
Created for BCLC statistical purposes. Paul King JIN barred 14 days pending BCLC investigation.				

Executive Brief:Participants Involved:Subject

Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Accused		

Ban/Watch Details

<u>Full Name</u>	<u>Ban/Watch</u>	<u>Start Date</u>	<u>End Date</u>
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Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120043848

JIN, Paul King

Ban

9/19/2012

9/19/2013

Type Of Ban: BCLC Prohibition

Notes:

Reason For Ban:

Identification: Drivers License

Supplemental Entries:

SP20120111687 Attached by stolee on Sep 20, 2012 14:53

Description Sep/20/2012 Writer discussed incident #43708 with BCLC casino investigations assistant manager John KARLOVCEC regarding subject Paul King JIN his actions and past activities in the casinos. JIN's behavior and actions are consider as inappropriate.
A 14 days BCLC barring pending investigation approved by BCLC KARLOVCEC.

Stone LEE
BCLC Investigator

On Sept/25/2012 An one year ban has been approved by BCLC KARLOVCEC.

Stone LEE
BCLC Investigator

SP20120114094 Attached by gkumpicco on Sep 26, 2012 13:42

Description On this date, patron Paul King JIN's BC Gold Cards #634384 has been suspended and mailshot removed.

SP20120122674 Attached by gkumpicco on Oct 16, 2012 00:00

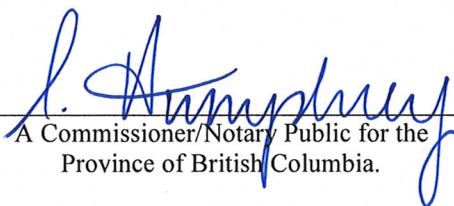
Description On this date, Barring Documents have been returned by Canada Post as "Unclaimed" original documents have been attached to this hard copy file.

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "L"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20120049710**

Date/Time Occurred: 5:42 PM
Day of Week Occurred: Redacted - RCMP
Date/Time Created: 5:56 PM
Date/Time Closed: 6:28 AM
Closed By: ilupu

Record Creation Details

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

Location of Incident:

Property: Starlight Casino (GC)
Location: Back of House-Starlight Casino
Sublocation: Sierra Cage

Details of Incident:

Daily Log #: DL20120989864
Related Incidents: IN20120051890
Type: Criminal Event
Specific: Suspicious Financial Transaction
Category:
Incident Status: Closed
Closing Remarks: IL
Synopsis: 150,000 in 20s Redacted - RCMP
 C170
Checklist: - Section 86 Form
 Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 5:56 PM	dandrews		
150,000 in 20s	Redacted - RCMP		

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

Incident File Full Report**Incident File #IN20120049710****Participants Involved:****Personnel**

Full Name:	HILLER, Michael	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	KILI, Buna Raluve	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Cage
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	ANDREWS, Dyan	Property:	Starlight Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

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

Ban/Watch Details

<u>Full Name</u>	<u>Ban/Watch</u>	<u>Start Date</u>	<u>End Date</u>
Redacted - RCMP	Removed Watch	Redacted - RCMP	
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			
Redacted - RCMP	Watch	Redacted - RCMP	
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			

Supplemental Entries:

SP20120126237 Attached by dandrews on Redacted - RCMP 18:00

Reporting Party:**Supervisor:**

Incident File Full Report

Incident File #IN20120049710

SP20120126237 Attached by dandrews on [Redacted - RCMP] 18:00

SP2012012623

Description

On the above noted date Surveillance received a call regarding a large buy in for [Redacted - RCMP]. The details are as follows.

7 - Continued-

[Redacted - RCMP] arrived at the casino at 17:35 hours driving a [Redacted - RCMP]
[Redacted - RCMP]

[Redacted - RCMP] proceed into the casino from the Upper Parking lot.

[Redacted - RCMP] is carrying a [Redacted - RCMP] and arrived at the Sierra Cage at 17:38 hours and handed over several bundles of what appeared to be all \$20 bills wrapped in rubber bands.

-The breakdown of cash was as follows:
7500 X 20s = 150,000

[Redacted - RCMP] received his chips at MDB2 18:00 hours as follows:
130,000 in \$5000 chips (26)
20,000 in \$1,000 chips (20)
Total \$150,000

-Patrons [Redacted - RCMP] sat at the table with [Redacted - RCMP]

[Redacted - RCMP] played a few small hands.

-By 19:23 hours [Redacted - RCMP] had lost all. There did not appear to be any irregular play.

-At 19:30 hours [Redacted - RCMP] is observed smoking on the patio near VIP.

-At 19:36 hours [Redacted - RCMP] leaves the casino via the front lobby, and is observed on a cell phone. He returns to his vehicle.

-At 19:40 hours [Redacted - RCMP] meets him at his vehicle..

-At 19:59 hours [Redacted - RCMP] return to the casino via the lobby and both go to the poker room.

-20:17 hours [Redacted - RCMP] leave the poker room and proceed to the upper parking lot.

Redacted - RCMP

[Redacted - RCMP] are observed returning to the casino and at 20:19 hours.

[Redacted - RCMP] presents himself at the Sierra cage at 20:20 hours and hands over several bundles of cash wrapped in rubber bands. The cash totals \$150,000 in the following denominations:

1 x \$10	-	10
2247 x \$20	-	44,940
1395 x \$50	-	69,750
353 x \$100	-	35,300
TOTAL =		\$150,000

[Redacted - RCMP] receives his chips at MDB2 at 20:41 hours as follows:

\$145,000 x \$5,000 chips	(29)
\$5,000 x \$1,000 chips	(5)
TOTAL = \$150,000	

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120049710

SP20120126237 Attached by dandrews on [Redacted - RCMP] 18:00

SP2012012623
7 - Continued-

[Redacted - RCMP] but do not play.

-Nothing irregular was observed.

-BY 21:10 hours [Redacted - RCMP] has lost all.

[Redacted - RCMP] leaves the casino at 21:14 hours with [Redacted - RCMP] drives off property with [Redacted - RCMP] in his vehicle. [Redacted - RCMP] leave separately.

Form 86 sent.

EOR

Footage saved in Exports/Suspicious Financial Transactions [Redacted - RCMP] /12-49710 [Redacted - RCMP]
[Redacted - RCMP] 20s MDB2

SP20120126473 Attached by mhiller on [Redacted - RCMP] 10:39

Description Report was reviewed. I will provide further comments once I review the video footage in [Redacted - FINTRAC]

The video footage was reviewed this date with the assistance of the surveillance supervisor loan Lupu. The video footage supports what has been documented in the supplemental reports that were submitted.

Redacted - FINTRAC

[Redacted - RCMP]

[Redacted - FINTRAC] reviewed a portion of the video footage again

Redacted - RCMP

Registered owner information has been requested for BCLs: 561 RRH and 666 TSJ.

Mike HILLER
BCLC Casino Security Investigator

SP20120126481 Attached by ilupu on [Redacted - RCMP] 11:09

Description On [Redacted - RCMP] a copy of the incident and subject profiles was emailed to GPEB - Mark FORSHAW.

End of Report

SP20120128640 Attached by mhiller on [Redacted - RCMP] 00:00

Description [Redacted - FINTRAC] Vancouver IPOC was also sent a copy of the circumstances (c.c. GPEB investigator Mark Forshaw and NWP [Redacted - RCMP]).

Mike HILLER
BCLC Casino Security Investigator

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120049710**

SP20120129488 Attached by mhiller on Redacted - RCMP 15:21

Description

Redacted
- RCMP

This date an email was sent to the BCLC Security Assistant Manager, John Karlovcec, to request a 5-Year BCLC Barring.

Mike HILLER
BCLC Casino Security Investigator

SP20120130912 Attached by gfriesen on Redacted - RCMP 15:53

Description

Redacted - RCMP

Reporting Party:

Supervisor:

Printed: 3/16/2020 1:31 PM

Page 5 / 6

Incident File Full Report**Incident File #IN20120049710**

SP20120130912 Attached by gfriesen on Redacted - RCMP 15:53

SP2012013091
2 - Continued-(G.Friesen) Mgr.
Sec. and Surv.
BCLC

SP20120131607 Attached by usavic on Redacted - RCMP 00:00

Description At approximately 1010 hrs, on Redacted - RCMP one DVD-R#12-07 containing the footage of this incident, was released to GPEB Director Derek DICKSON.

SP20120134280 Attached by mhiller on Redacted - RCMP 00:00

Description Redacted - RCMP The following registered owner information was obtained:

Redacted - RCMP

The iTrak vehicle list was updated accordingly.

Mike HILLER
BCLC Casino Security Investigator

SP20120143214 Attached by mhiller on Redacted - RCMP 00:00

Description

**Redacted -
RCMP**

He understood my explanation and no further BCLC action is required.

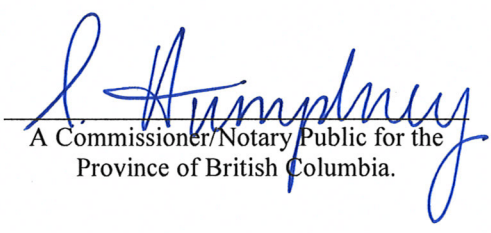
These comments were also added to incident 2012-0051890.

Mike HILLER
BCLC Casino Security Investigator

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "M"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

October 07, 2016

Via E-Mail

Attn: All Service Providers

RE: Refused Cash Buy-In (By Site) Directive

Purpose

To establish a protocol to ensure a consistent approach in dealing with patrons that have been denied a cash buy-in by a service provider due to suspicious activity. It is the expectation of BCLC (as per the BCLC AML on line training course) that when a patron is observed conducting a cash buy-in and suspicious behaviour is observed by staff, that buy-in should be refused and a UFT file should be created to document the attempted buy-in.

To ensure the patron does not attend another service provider location and attempt to buy-in with the same cash, (as the staff would likely not have knowledge of the previous suspicious behaviour), a protocol has been established that all service providers shall adhere to. **Any cash buy-in which has been refused by any site for suspicious behaviour shall not be accepted for buy-in at any location until authorized by the BCLC AML Unit.**

BCLC Directive

- If a patron has been denied a cash buy-in for suspicious behaviour, a UFT file shall be created in Itrak to document the incident including patrons involved, vehicles involved, and nature of the suspicious behaviour. Please ensure the synopsis comments include the phrase "REFUSED CASH BUY-IN" when the file is first created.
- An entry shall immediately be made in the patron profile comment section indicating the refused buy-in, amount, date, time and include the phrase "Refused cash buy-in as per BCLC Directive. No further cash buy ins to be accepted until further notice from BCLC AML Unit."
- Please forward an email with the file number and synopsis to [REDACTED]

Upon receiving notification of a refused buy-in incident the BCLC AML Unit will conduct an investigation into the circumstances of the file. Any subsequent action to be taken with the patron will be documented in their profile by the AML Unit.

Your continued cooperation is greatly appreciated. Please contact me by email or cell if you have any questions or concerns with this directive.

Daryl Tottenham
Manager
BCLC AML Programs



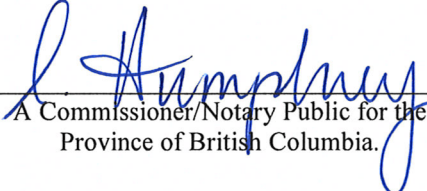
74 West Seymour Street
Kamloops, BC V2C 1E2

T 250.828.5500
F 250.828.5631

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.225.6424
bclc.com

THIS IS **EXHIBIT "N"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

April 16, 2015

To whom it may concern,

Please find attached, the BCLC Investigations Protocol for Educating, Warning, Sanctioning, or Barring Patrons protocol. This document was developed in part with the collaboration of key personnel in the casino industry.

The purpose of this protocol is to serve as a guideline for all stakeholders when it is necessary to address and correct the actions of patron's when their behaviour, activity or conduct poses a risk to his or her safety or the safety of others, or when the patron's behaviour, activity or conduct is unacceptable or suspicious in nature.

In keeping with our "Gold Standard" of AML compliance, it is also necessary to have an established protocol in place to satisfy Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) guidelines when dealing with a patron whose behaviour, activity or conduct is inconsistent with anti-money laundering strategies.

These guidelines will ensure that all stakeholders are aware of the options available and courses of action that may be exercised to accomplish the goal of addressing and correcting patron's actions. These guidelines also outline consequences for patrons that disregard or fail to comply with requests or direction to refrain from the questionable behaviour, activity or conduct.

A consistently applied standard ensures fairness and a clear line of communication between BCLC Corporate Security and our Service Partners. Please ensure that this information is shared and understood with all those Service Partner employees who are directly affected.

If there are any questions regarding this document or its implementation, please feel free to contact me at your convenience.

Regards,



Kris Gade
Manager, Investigations – BCLC



74 West Seymour Street
Kamloops, BC V2C 1E2

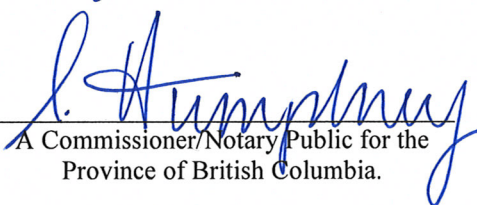
T 250.828.5500
F 250.828.5631

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.225.6424
bclc.com

THIS IS **EXHIBIT "O"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC Investigations Protocol for Educating, Warning, Sanctioning or Barring Patrons

April 16, 2015

Prepared By:

BCLC Corporate
Security & Compliance



Corporate Security &
Compliance

Implementation Date:
April 16, 2015

RE: BCLC Investigations Protocol for Educating, Warning, Sanctioning or Barring Patrons

BCLC Investigations Protocol for Educating, Warning, Sanctioning or Barring Patrons

When the behaviour, activity or conduct of a patron:

- is considered a risk to his or her safety or the safety of others;
- is considered unacceptable or suspicious in nature;
- is inconsistent with anti-money laundering strategies.

and a decision is made to escalate action to be taken to correct the behaviour, activity or conduct, a BCLC Investigator will make a verbal notification to the Service Provider representative that has been identified to BCLC by the Service Provider as the main Point of Contact for the purposes of this protocol.

Note: If the behaviour, activity or conduct is, or possibly is, unlawful in nature, the required notification will be made to the appropriate Law Enforcement agency and this protocol is not applicable.

Note: The Service Provider should identify a main Point of Contact with a designate(s) to allow for the necessary notification to be communicated in a timely manner.

Subsequent to the verbal notification, the BCLC Investigator will follow up with an email notification to the Point of Contact and designate(s).

Course of Action Options

Depending on the circumstances, the following are possible courses of action:

1. **Service Provider Session with Patron to Educate** is appropriate when:
 - The patrons behaviour, activity or conduct is not considered serious in nature and/ or there is no or limited previous history.
2. **Service Provider Session with Patron to Warn**
 - The patron's behaviour, activity or conduct is minor in nature and reasonable efforts have been made to educate, or a session to educate is not appropriate.
3. **BCLC Investigator Interview of Patron to Educate**
 - The patron's behaviour, activity or conduct is minor in nature and the Service Provider has had a session(s) to educate the patron or the Service Provider chooses to have the BCLC Investigator have the session to educate the patron or a session to educate by the Service Provider is not appropriate.
4. **BCLC Investigator Interview of Patron to Warn**
 - The patrons behaviour, activity or conduct is such that a warning is appropriate for the circumstances and/ or a Service Provider session(s) to educate was unsuccessful and/ or a session(s) to educate by BCLC Investigator was unsuccessful.
5. **Immediate barring from gambling pending an interview by a BCLC Investigator**
 - The patron was previously educated and/ or warned on the behaviour, activity or conduct and /or the behaviour, activity or conduct is considered serious in nature.
6. **BCLC Sanctions that could possibly be imposed:**
 - Not permitted to play with un-sourced chips.
 - Not permitted to play with un-sourced funds.
 - Requirement to open and utilize a Patron Gaming Fund account.

7. BCLC Provincial Barring up to five (5) years

- Reasonable efforts have been made to educate the patron and/or a previous warning or warnings did not correct the behaviour, activity or conduct, and/or the circumstances are considered egregious.

Notification by BCLC Investigator to Service Provider

When a BCLC Investigator makes the initial notification to the Service Provider Point of Contact (SP POC) and designate(s) about an identified issue with the behaviour, activity or conduct of a patron, the notification will include:

- a description of the issue with as much detail as possible and appropriate;
- what course of action is considered appropriate by BCLC.

Notwithstanding the above, when the notification is made and when appropriate, a consultative process can be exercised by the SP POC and BCLC Investigator to determine the appropriate course of action.

The BCLC Investigator will share with the SP POC as much information as possible that can be shared without compromising the integrity of the investigation or breach the patron's privacy.

Course of Action

Session with Patron to Educate

When the course of action is to educate the patron, the BCLC Investigator will:

- request that an SP representative (SP Rep.) conduct the session to educate; or
- advise that a BCLC Investigator will conduct the session to educate.

The option is available to the SP POC to choose not to be involved in the process to educate the patron.

By Service Provider - When the course of action is for the patron to be educated by a SP Rep, the session to educate will take place on the next occasion when the patron is on site or as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and the Service Provider without unreasonable or unjustified delay.

The session to educate will be documented in CRS (iTrak) by the SP Rep. detailing the discussion with the patron and what if any acknowledgement of the issue and commitment to comply was made by the patron.

By BCLC Investigator -When the course of action is for the patron to be educated by a BCLC Investigator, the session to educate will take place as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and BCLC Investigator.

When the session to educate by the BCLC Investigator is to take place:

- The SP Rep. will be requested to identify an appropriate room that will ensure privacy.
- The SP Rep. will be requested to approach the patron and request attendance to meet with the BCLC Investigator.
- The SP Rep. will not be included in the session unless specifically requested by the BCLC Investigator. However, there may be occasion when a patron requests the presence of a SP Rep. during the session with a BCLC Investigator; in these situations the BCLC Investigator will determine if having a SP Rep. present as an observer is appropriate and or practical.
- If the BCLC Investigator is unable to make arrangements beforehand for an interpreter, if necessary, a request will be made to the SP to assist with providing an interpreter.

The session to educate will be documented in CRS (iTrak) by the BCLC Investigator with details of the discussion with the patron and what if any acknowledgement and commitment to comply was made by the patron.

Note: The CRS (iTrak) may in some cases have restricted access.

In addition to documenting in CRS (iTrak), the BCLC Investigator will provide the SP POC with an email summary.

Repeat a Session to Educate

On each occasion when deciding on a course of action, the circumstances will be assessed on a case by case basis and an available option can be to repeat a session to educate.

Session with Patron to Warn

When the course of action is to warn the patron, the BCLC Investigator will:

- request that a SP Rep. conduct the session to warn; or
- advise that a BCLC Investigator will conduct the session to warn.

The option is available to the SP POC to choose not to be involved in the process to warn the patron.

Service Provider session with patron to warn

When the course of action is for the patron to be warned by a SP Rep, the session to warn will take place on the next occasion when the patron is on site or as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and the Service Provider without unreasonable or unjustified delay.

A session to warn involves advising the patron that to continue the behaviour, activity or conduct could result in:

- A Service Provider site barring.
- A Service Provider imposed sanction.
- A BCLC Provincial barring up to 5 years.
- A BCLC imposed sanction.

The session to warn will be documented in CRS (iTrak) by the SP Rep. detailing the discussion with the patron and what if any acknowledgement of the issue and commitment to comply was made by the patron.

BCLC Investigator session with patron to warn

When the course of action is for the patron to be warned by a BCLC Investigator, the session to warn will take place as soon as is practicable.

Note: As soon as is practicable is defined as the earliest appropriate opportunity for both the patron and BCLC Investigator.

A session to warn involves advising the patron that to continue the behaviour, activity or conduct could result in:

- A BCLC Provincial barring up to 5 years.
- A BCLC imposed sanction.

When the session to warn by a BCLC Investigator is to take place:

- The SP Rep. will be requested to identify an appropriate room that will ensure privacy.
- The SP Rep. will be requested to approach the patron and request attendance to meet with the BCLC Investigator.
- The SP Rep. will not be included in the session unless specifically requested by the BCLC Investigator. However, there may be occasion when a patron requests the presence of a SP Rep. during the session with a BCLC Investigator; in these situations the BCLC Investigator will determine if having a SP Rep. present as an observer is appropriate and or practical.
- If the BCLC Investigator is unable to make arrangements beforehand for an interpreter, if necessary, a request will be made to the SP to assist with providing an interpreter.

The session to warn will be documented in CRS (iTrak) by the BCLC Investigator with details of the discussion with the patron and what if any acknowledgement and commitment to comply was made by the patron.

In addition to documenting in CRS (iTrak), the BCLC Investigator will provide the SP POC with an email summary.

Note: The CRS (iTrak) may in some cases have restricted access.

Repeat a Session to Warn

On each occasion when deciding on a course of action, the circumstances will be assessed on a case by case basis and an available option can be to repeat a session to warn.

BCLC Investigator Interview

When the behaviour, activity or conduct of a patron is or possibly is identified as an Anti-Money Laundering associated risk and it is necessary to satisfy the requirements of FINTRAC regulations and guidelines, BCLC Corporate Security and Compliance will direct a BCLC Investigator to conduct an interview of the patron.

Patron Interview objectives may be to determine:

- source of funds, and or;
- employment /company, and or;
- other information as needed.

Subsequent to the interview, the following are possible outcomes:

- patron is permitted to continue play
- sanctions / restrictions
- BCLC Provincial barring

BCLC Provincial Barring pending an interview by a BCLC Investigator

When a patron has been previously educated and or warned about behaviour, activity or conduct, and or the behaviour, activity or conduct, is serious or egregious in nature, an assessment will be performed by BCLC Corporate Security and Compliance.

BCLC Corporate Security and Compliance will determine if the patron will receive an immediate BCLC Provincial barring pending an interview by a BCLC Investigator to prevent a recurrence or continuance of the behaviour, activity or conduct in question.

When a patron receives a BCLC Provincial barring pending an interview by a BCLC Investigator, if a BCLC Investigator will possibly not be available to conduct the interview when the patron is in attendance at the site, direction may be given to the Service Provider to allow the patron to gamble if:

- the patron commits to not repeat the behaviour, activity or conduct that resulted in the barring, and;
- the patron must agree to contact the BCLC Investigator as soon as possible; and
- the Service Provider will provide the patron with the name and number of the BCLC Investigator the patron is to contact to schedule an interview.

BCLC Provincial Barring

When a patron has been previously educated and or warned about behaviour, activity or conduct, and or the behaviour, activity or conduct, is serious or egregious in nature, an assessment will be performed by BCLC Corporate Security and Compliance.

BCLC Corporate Security and Compliance will determine:

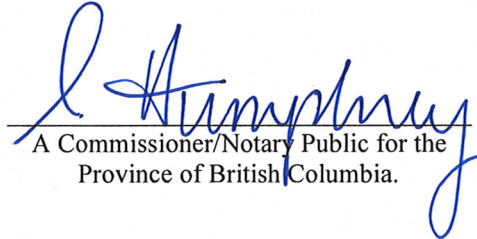
- if the patron will be categorized as an Undesirable and receive an immediate BCLC Provincial barring of up to five (5) years.
- if a sanction or sanctions will be imposed on the patron.

Sanctions

BCLC Sanctions that could possibly be imposed:

- Not permitted play with un-sourced chips.
- Not permitted play with un-sourced funds.

THIS IS **EXHIBIT "P"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st ^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

To: Glenn Atchison[REDACTED];
 [REDACTED] Craig Longley[REDACTED];
 [REDACTED] 'Rob Kroeker'[rkroeker@gcgaming.com];
 [REDACTED] 'Patrick Ennis'[REDACTED];
 [REDACTED]
 Great Canadian Casino-Security Director
 [REDACTED]
 [REDACTED] Devin McCormack
 [REDACTED]
Cc: Bruno Gatto[REDACTED]; Kevin Sweeney[REDACTED]; Brad
 Desmarais[REDACTED]; Daryl Tottenham[REDACTED]
From: Ross Alderson
Sent: [REDACTED] Redacted - RCMP
Subject: Sanctions on high limit players
 Redacted - RCMP

.....
 >>>>

Good morning,

This morning certain conditions were imposed on a list of 10 Casino Patrons which I have attached to this email. Their iTrak profiles will be shortly updated.

All players on the list are no longer permitted to buy-in at any BC Casino with any "un-sourced" cash or gaming chips until further notice.

BCLC has attempted to contact all 10 players to arrange an interview with each patron to inform them of the conditions and discuss certain recent activity which has resulted in these conditions. Unfortunately at this time due to sensitivity I am not at liberty to discuss that activity further.

Below are the following conditions to be imposed effective IMMEDIATELY:

1/ Un-sourced Cash and Chips

- If any of the players on the list decides to buy-in using cash (any amount), this buy-in must be accompanied by a withdrawal slip from an accredited financial institution showing the same date as the attempted buy-in.
- If any of the players on the list decides to buy-in with gaming chips, the site must be able to show that the chips were the result of a previous verified win, otherwise they will not be accepted at this time until BCLC has conducted a player interview.
- No player on this list can accept any cash or chips (either sourced or un-sourced) from any other persons at any time. Eg no "chip passing" of any kind

Please note the above applies to all transactions, regardless of amount

2/ Bank Drafts

- If any of the players on the list make a deposit into their PGF Account using a bank draft, the following restrictions apply:

- Bank Draft must be from an accredited financial institution
- The player must be able to show that the Bank Draft is derived from their own bank account, and must be made payable to the Casino accepting the deposit

Any deviation from the above conditions, may result in immediate additional measures, including sanctions such as possible suspension or outright prohibition of the players gaming privileges.

As we value our business partnership with all our players, it is critical that all Service Partners assist in ensuring these conditions are followed without exception. BCLC will continue to reach out to all players today in the hope of alleviating the need for any future sanctions.

As always we appreciate the assistance of our business partners.

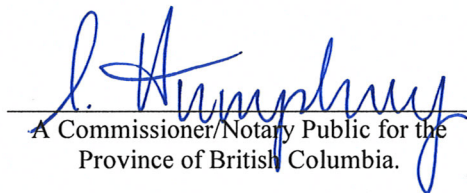
If there are any comments or questions please feel free to contact me at your earliest convenience and I will attempt to answer as much as I am able.

Thank you for your cooperation

[REDACTED]

V3: Operational File - Current Status Unknown			

THIS IS **EXHIBIT "Q"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ~~21st~~^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SID	Player
V3: Operational File - Current Status Unknown	

11 Sept 2015

RE: BCLC Direction to BC Gaming Service Providers

Good Morning,

Today certain conditions are to be imposed on a small number of Casino Patrons. The list of patrons is attached in a separate PDF document attached to this email.

The iTrak profiles of these players will be updated shortly. This list includes the previous list of patrons from my email dated August 5, 2015.

All players on the list are no longer permitted to buy-in at any BC Casino with any "un-sourced" cash or "un-sourced" gaming chips until further notice.

BCLC continues to use a sound evidence based approach to all player activity. Decisions made regarding the player behavior of the players on this list are made unique to each individual player and/or circumstance. They align with both BCLC's Anti Money Laundering Program and with BCLC's key values specifically, Social Responsibility and Integrity.

Below are the following conditions to be imposed effective **IMMEDIATELY**:

Un-sourced Cash and Chips

- If any of the players on this list wish to buy-in using cash (any \$ amount), this buy-in must be accompanied by a withdrawal slip from an accredited financial institution (including from an ATM) withdrawn within 2 Business days of the attempted Casino buy-in.
- If any of the players on this list wish to buy-in with gaming chips, the site must be able to show that the chips were the result of a previous verified win, otherwise they will not be accepted until BCLC has conducted a player interview to ascertain the origin of those chips.
- No player on this list will be able to accept any cash or chips (either sourced or un-sourced) from any other persons while in a facility at any time. Eg: no "cash passing or chip passing" of any kind.
- No player on this list will be allowed to dictate game play to a third party while in a Gaming Facility.

Please note the above applies to all transactions, regardless of amount. We would strongly encourage players to utilize the cash alternative options available to them.



74 West Seymour Street
Kamloops, BC V2C 1E2

T 250.828.5500
F 250.828.5631

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.225.6424
bclc.com

Any deviation from the above conditions may result in immediate additional measures, including possible suspension or outright prohibition of the players gaming privileges.

We value our business partnership with all our players. It is critical that all Service Partners assist in ensuring these conditions are followed without exception. It is equally imperative for the integrity of this industry that we discourage all our players from using funds which are potentially borrowed from unknown or unfamiliar sources.

When there are reasonable grounds to believe players are willingly associated with criminality they will be banned outright. When there are reasonable grounds to believe players may be un-wittingly associated with criminality, they will be banned from buying in with any un-sourced financial instrument until the source of that instrument can be reasonably confirmed as legitimate.

BCLC Investigations will attempt to contact all players to arrange an interview with each patron to discuss the activity which has resulted in these conditions.

NOTE: All patrons who have been interviewed previously will not be required to be interviewed. Any players on this list who are currently banned or VSE will not be interviewed until the ban/VSE has expired.

As always we appreciate the assistance of our business partners.

Please feel free to contact me at on [REDACTED] or via email on [REDACTED] if there are any comments or concerns and I will attempt to answer as much as I am able.

Thank you once again for your cooperation

Regards



Ross Alderson
Director AML & Operational Analysis, BCLC



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Kamloops, BC V2C 1E2

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F 250.828.5631

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.225.6424
bclc.com

cc.

Brad Desmarais
Vice President, Casino and Community Gaming, BCLC

Rob Kroeker
Vice President, Corporate Security & Compliance, BCLC



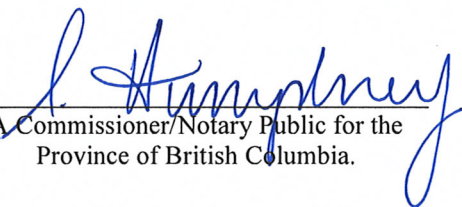
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T 250.828.5500
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T 604.215.0649
F 604.225.6424
bclc.com

THIS IS **EXHIBIT "R"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20150008636

Date/Time Occurred:	2/16/2015 3:40 PM	Record Creation Details	
Day of Week Occurred:	Monday	Department:	BCLC Corporate Security
Date/Time Created:	2/16/2015 3:41 PM	Owner:	sbeeksma
Date/Time Closed:	2/16/2015 3:42 PM	Operator ID:	sbeeksma
Closed By:	sbeeksma	Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: Vancouver (BCLC)

Location:

Sublocation:

Details of Incident:

Daily Log #: DL20150156939

Type: Assistance To

Specific: BCLC

Category:

Incident Status: Closed

Synopsis: Interview with [Redacted - Patron Interview Identifying Information] 2015-FEB-16 at 1455hrs.

Checklist:

Narrative:	Created On	Created By	Modified On	Modified By
	2/16/2015 3:41 PM	sbeeksma		

Executive Brief:

Participants Involved:

Subject

Full Name:	[Redacted - Patron Interview Identifying Information]	Company:	[Redacted - Patron Interview Identifying Information]
Role:	Patron		

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150008636

Supplemental Entries:

SP20150024381 Attached by sbeeksma on Feb 17, 2015 09:40

Description

Interview with [Redacted - Patron Interview
Identifying Information]

2015-FEB-16 @ 1455hrs

Present: BCLC investigator Steve BEEKSMA, RRCR AGM's Deborah HUANG and Rishi KHAIRA and VIP Guest Services host Jonathan QIAO assisting with translation.

Background:

On the afternoon of 2015-FEB-13 the writer sent email correspondence to RRCR management requesting they speak with [Redacted] at the next opportunity regarding concerns surrounding who he is getting his gambling money from [Redacted - Patron Interview
Identifying Information]. Additional goals surrounded KYC with hopes of clarifying [Redacted] s occupation and obtaining company name(s). [Redacted] was in the casino twice over the weekend (14th and 15th) however he was not approached by RRCR management as requested. The explanation provided by HUNAG and KHAIRA was that there were no AGM's on site at the time and they preferred an AGM or higher speak with [Redacted] to ensure a consistent message, similar to past patron interviews.

The directive came from BCLC HQ that [Redacted] s play would be suspended until he speaks with RRCR management. RRCR management requested the writer be available to assist with the questioning/education. KHAIRA and HUANG were going to make arrangements to have [Redacted] attend the casino to meet with us. [Redacted] s casino profile comments were updated to reflect this (he remained on Watch, no Ban was implemented).

Incident details:

On the above date and time the writer was called by RRCR AGM KHAIRA advising that Mr. [Redacted] was on site and requested the writers presence in relaying the desired message to him. This was an unscheduled meeting however [Redacted] was on site and the decision was made to take the opportunity to speak with him.

At approx 1455hrs the writer attended RRCR's VIP Salon and met with AGM's KHAIRA and HUANG. Guest services QIAO was with [Redacted] as he was redeeming chips at the cashier and escorted him to a private gaming room to speak with us.

It was noted that [Redacted] appeared to have consumed alcohol, was mildly intoxicated (staggering slightly and the smell of alcohol on his breath) but was in good spirits and seemed to completely understand the points we wanted to convey.

[Redacted] spoke no English as such the entire conversation was translated by QIAO into Mandarin Chinese. It seemed to the writer that HUANG and possibly KHAIRA understood some of what was being said by [Redacted - Patron]

Introductions were made and the role of BCLC in gaming in BC (along with briefly touching on other regulators) was explained to [Redacted]

The concerns regarding who [Redacted] is getting his gambling money from were addressed. [Redacted]

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150008636

SP20150024381 Attached by sbeeksma on Feb 17, 2015 09:40

SP2015002438

1 - Continued-

explained that he is very friendly and likes to make friends everywhere he goes. He further stated he wished to become friends with us but was sad that he could not communicate with us. All persons present were invited by [Redacted] to come to China as his guest.

He admitted to borrowing money from [Redacted] and referred to him as his "friend". [Redacted] explained that he does not hold any bank accounts in Canada and has no other alternative to cash when he comes to gamble.

[Redacted] mentioned that he does have a wife in Canada who holds Canadian bank account(s) but cannot use her accounts (the impression was she does not know the extent of his gambling).

[Redacted] s wife's name was not requested.

The safety concerns regarding large amounts of cash and his dealings with [Redacted] were expressed.

[Redacted] thanked us for our concerns.

It was explained to him that [Redacted] is banned from BC casinos and if he continues to associate with him he could lose his ability to gamble in all BC Casinos (not only RRCR).

[Redacted] stated he would never borrow money from [Redacted] again. It was reiterated that if he wants to gamble he should arrive with his money in hand and to not be involved in deliveries of cash [Redacted] or otherwise), [Redacted] understood.

[Redacted] was asked to elaborate on his business/occupation. He explained that he is a property developer in China and runs two companies.

QIAO had the two company names written in Chinese characters which he translated as follows:

1. [Redacted - Patron Interview Identifying Information]
2. [Redacted - Patron Interview Identifying Information]

To conclude [Redacted] was advised that he is a valued guest and welcome to play in RRCR but he needs to cease his dealings with [Redacted] and stop receiving cash deliveries at the casino. [Redacted] was never named specifically but [Redacted] seemed to know who we were referring to (recent incidents show [Redacted] has been dealing with [Redacted] exclusively).

[Redacted] understood and left casino with his associate previously identified as [Redacted - Patron Interview Identifying Information].

[Redacted] indicated that he would be returning to China on 2015-MAR-03.

Following the interview the writer located KHAIRA in the AGM office to thank him for making the quick arrangements to speak with [Redacted]. KHAIRA was thankful for the writers assistance and suggested perhaps this would be a positive way of doing these types of interviews in the future. KHAIRA mentioned that [Redacted] referred to [Redacted] as "his money guy". This was not translated to the writer during the interview but was how KHAIRA understood (KHAIRA may have some knowledge of the Chinese language).

Conclusion:

[Redacted] subject profile was updated to reflect that he had been spoken to and may resume gambling. Additionally his occupation and company name were updated.

BCLC management along with the AML unit was updated at the conclusion of the interview (which was not planned) via telephone followed by email.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150008636

SP20150024381 Attached by sbeeksma on Feb 17, 2015 09:40

SP2015002438

1 - Continued-

A copy of this report has been forward to the management group via email as well.

File concluded here.

S.BEEKSMA

BCLC

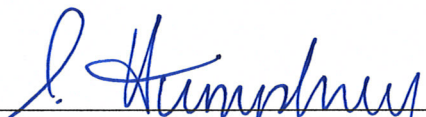
Casino Investigations

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "S"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC Interview Intelligence Summary

Individual interviewed:

NAME: [Redacted - Patron Interview Identifying Information]
SID #: 100893
Interview Date: 2015-OCT-16
Interview Time: 1535hrs--1615hrs
Interview Location: River Rock Casino Resort (Private room in the VIP Salon)
Language spoken: Mandarin
Investigators: Steve BEEKSMA, Stone LEE and Jerome WAKELAND
Translator: Investigator LEE

BCLC iTrak file: 2015-54516

Pre-Interview Events:

On 2015-OCT-16 at approx. 1156hrs investigator BEEKSMA received a call from River Rock (RRCR) Executive Host Lisa GAO informing that Priority 1 patron [Redacted - Patron Interview Identifying Information] had "just landed" and wanted to speak with an investigator.

GAO indicated [Redacted - Patron] wanted to get this taken care of ASAP as he wanted to gamble uninterrupted over the coming weekend. GAO was told the conditions will likely remain in place, even following the interview but that we would accommodate the interview as requested.

[Redacted - Patron] casino profile comments/directive as follows:

"2015-SEP-24 ***BCLC DIRECTIVE*** Effective immediately (as per letter sent to SP management this date) patron is not allowed to buy-in at any BCLC site with "un-sourced" cash (all cash without a bank or ATM withdrawal slip) or "un-sourced or borrowed" chips until further notice. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview to discuss further. Ross ALDERSON, Director AML & Operational Analysis, BCLC AML Unit"

GAO indicated that [Redacted - Patron] was presently eating lunch in the Sea Harbour restaurant (across the street from the resort) and suggested 1300hrs for the interview time which was agreed. After some back and forth between BEEKSMA and GAO the agreed upon interview time was solidified as 1530hrs due to scheduling conflicts with [Redacted - Patron]'s availability.

A private room in the Salon was set aside as the interview location. BCLC Management and AML were updated.

Synopsis:

At approx. 1535hrs Investigators BEEKSMA, LEE and WAKELAND met with [Redacted - Patron] (escorted by GAO) at a private room (MDB 13/14)) in the casinos VIP Salon.

After introductions were made (BEEKSMA's business card provided to [Redacted - Patron]), BCLC's role in Gaming in BC, conditions surrounding [Redacted - Patron]'s inability to use un-sourced funds were explained to him.

He was educated regarding casino PGF accounts and thanked for using one of late.

The interview lasted approx 30 minutes and [Redacted - Patron] remained respectful throughout.

The following points of interest were learnt from [REDACTED]

[REDACTED - Patron] s particulars (including sourced of wealth, business name(s) etc) were confirmed recently (soft interview on 2015-FEB-16) as such this was not covered again during this interview.

It was learned that [REDACTED] has a wife and 2 daughters in Canada and it seems he spends more time in China than in Canada.

Over the next few days [REDACTED - Patron] indicated he would be going to LA for business then returning to China where he will remain for up to the next year.

[REDACTED - Patron] confirmed he does **not** have any RRCR chips at home/off site.

At one point during the interview [REDACTED - Patron] brought up a dinner he had with a [REDACTED - Patron Interview Identifying Information] from RRCR. He stated the dinner was around Christmas time (2014-DEC) and showed investigators images saved on his smart phone.

The following staff was recognized in the photos shown by [REDACTED - Patron]

Redacted - Patron Interview Identifying Information

Regarding the un-sourced cash:

- When [REDACTED - Patron] uses cash he said he borrows from "friends" locally.
- Loans are generally paid back in China as all of his businesses are there.
- He indicated his friends will either deliver the cash to his house or to the casino (depending on his needs). [REDACTED - Patron] used the word "borrow".
- When asked where his friends get the money from [REDACTED - Patron] responded by stating he doesn't know and has never asked.
- Some of these "friends" [REDACTED - Patron] met here, locally, at social gatherings (dinners, out drinking etc).
- [REDACTED - Patron] spoke about how he cannot even get his "friends" to get him bank drafts, or his wife and understands they need to be in his name.
- He would rather not deal in cash as he has personal safety concerns regarding carrying cash around.
- [REDACTED - Patron Interview Identifying Information] stated we do not have to worry about him using cash anymore, he will use his PGF account only apologized more than once for any problems he may have caused us).

RE: PGF accounts:

- [REDACTED - Patron] spoke at length about the difficulties he had opening a bank account in Canada. There were issues with him immigrating due to not spending enough time in Canada (he indicated that in 2011 he was out of the country for 2 years).
- With the help of his lawyer and accountant, [REDACTED - Patron] managed to open a Canadian bank account which is how he was able to open a PGF account [REDACTED - Patron] at RRCR using HSBC bank drafts.
- [REDACTED - Patron] indicated it is still complicated for him to get his money from China into his CDN account sighting something about possible tax implications.
- [REDACTED - Patron] indicated the bank limits the amount he can take out which he advised is OK as it helps control his spending.
- [REDACTED - Patron] mentioned he finds the whole PGF account process takes too long (both deposit/re-deposit and withdrawals).

Underground Casino(s):

Redacted - Patron
Interview
Identifying
Information

brought this topic up without any prompting from investigators.
believes there are 2 or 3 underground casinos as he understands.
stated that all of our players are there.

-“We” are losing a lot of money to underground casinos and should come up with a solution quickly.
-His “friends” have been trying to convince him to go. He doesn’t want to go but many of his “friends” are there.

Redacted - Patron stated he was taken to one of them once following dinner/drinks with friends Redacted - Patron indicated he doesn’t drive) and noted “everybody” was there.

-He stated he did not gamble (only watched friends play) but learned that you do not need cash to play and gambling losses are paid back in China.

Redacted - Patron was asked if he noticed what the underground casino is using for chips, are they the same as RRCR’s (pointing at the chip tray of the table we were seated at). He stated no, they have their own chips (different from RRCR’s).

-He stated we need to do something fast and offered some suggestions (detailed below).

-When told that even being present at one of these illegal gaming houses could have a negative legal impact on him Redacted - Patron seemed surprised. He was told that this could have an impact on him if he’s trying to get Canadian citizenship, permanent residency etc and could also impact his ability to visit Canada.

Redacted - Patron understood the risks of attending these kinds of places.

Redacted - Patron
Interview

s suggestions/comments:

Redacted - Patron brought up more than once during the interview that he would like the casino to have a sort of safety deposit box where he can store his chips.

He suggested the casino (cashier) could hold the key and whenever he wants to access it he could get the key from them then return it.

-He finds the verified win and PGF deposit process too slow and this would be much faster for customers.

-This addresses any safety concerns for customers taking cash/chips off site.

-It also prevents customers from taking chips off site.

Education RE Conditions, chips and Redacted - Patron s options:

Redacted - Patron
Interview
Identifying

confirmed he does **not** have any casino chips off site/at home.

was re-educated with regard to the terms of the conditions BCLC has imposed on him. He was informed that he will not be able to gamble with any un-sourced cash or chips and the casino, along with BCLC will need to be able to verify the source of his funds.

Redacted - Patron advised investigators “don’t worry about cash”, he will use his PGF account (and apologized again for causing us problems).

Redacted - Patron indicated that he would try not to engage in chip passes or verbal bets but advised it is difficult to say no to friends (or for friends to say no to him).

He advised that “Western” culture doesn’t understand. If one of his friends sees he is out of chips he will be provided with more, often times without even asking.

-He will try not to engage in chip passing but advised he will not say no to a friend asking for chips as this would be perceived as disrespectful (“losing face”).

Redacted - Patron clearly understands BCLC’s concerns regarding the un-sourced cash.

Interviewer comments:

*RRCR Executive Host GAO was updated upon completion of the interview and reminded the same conditions remain in place for Redacted - Patron .

Redacted - Patron

was very approachable and spoke freely on some points without the need to be prompted by investigator questioning.

The investigators impression is that [Redacted - Patron] is a very social person, enjoys going for dinners, drinking and making new friends. Near the conclusion [Redacted - Patron] stated he wished he could speak English so he could be friends with investigators and invited investigators for dinner (respectfully declined). [Redacted - Patron] made the same offer to investigator BEEKSMA at the conclusion of a soft interview on 2015-FEB-16.

Some of the information obtained via this interview re-enforced some of what BCLC investigations have learnt via other patron interviews.

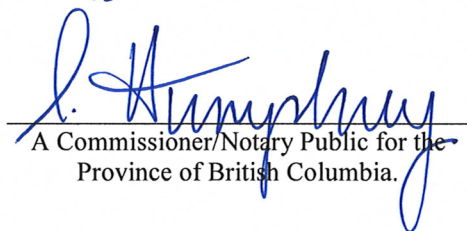
[Redacted - Patron] did offer a solution/alternative to cash for BCLC to consider (on site chip storage).

[Redacted - Patron] stated he does not have any casino chips off site/at home so no further direction is required from the AML unit on this point. Considering this, an open (site specific) iTrak incident was not requested. [Redacted - Patron] SID profile comments have been updated

A copy of this interview summary has been sent via email to project coordinator Tom CAVERLY, CC'd to BCLC Corp Sec management Bruno GATTO, Kris GADE and AML's Ross ALDERSON and Daryl TOTTENHAM.

S.BEEKSMA
BCLC
Casino Investigator

THIS IS **EXHIBIT "T"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd

A Commissioner/Notary Public for the
Province of British Columbia.

Interview of [Redacted - Patron Interview Identifying Information] on 2015- 17390

2015-APR-07 @ approx 1255hrs the writer, along with BCLC investigator LEE, Stone assisting with translation met with [Redacted - Patron Interview Identifying Information] as previously arranged. RRCR AGM's were updated and RRCR VIP staff arranged for us to speak with [Redacted - Patron] in one of the private rooms in the Salon (MDB 13 and 14).

To the writers knowledge [Redacted - Patron] does not speak English, the entire conversation was done through LEE via translation in Mandarin.

Firstly [Redacted - Patron] was thanked for taking the time to meet with us.

We discussed the 2015-MAR-23 incident at VILLA casino that involved [Redacted - Patron] receiving a cash delivery from a vehicle believed to be associated to [Redacted - Patron Interview Identifying Information]. [Redacted - Patron] explained that he is lazy and does not want to leave the casino and they will deliver to him. He referred to them as "friends" that know his credit is good and will provide him with money when he needs it. When asked for his "friends" name(s) he only stated he referred to one of them as [Redacted - Patron]. When asked if [Redacted - Patron] is bald he said "that guy too" (possibly referencing [Redacted - Patron Interview Identifying Information]) [Redacted - Patron] stated he simply makes a phone call and they bring him the money he's asked for.

Next we moved on to the 2015-MAR-31 incident at RRCR detailing a cash delivery from a vehicle associated to a banned [Redacted - Patron Interview Identifying Information] stated that similar to the VILLA incident he makes a phone call and the money is delivered to him. [Redacted - Patron] was asked if it is the same number he calls and he stated no, these are 2 different groups of "friends" (different people).

We explained to [Redacted - Patron] our concerns surrounding cash deliveries and the fact that some of these people are banned and we don't want them near the casino. [Redacted - Patron] explained that he loves Canada, is completely legitimate (his money is legitimate), pays taxes and does not want to break the law. He stated he would stop calling these people to bring him money. [Redacted - Patron] went on to explain that he has lost nearly a quarter of his net worth in the casino and had to sell one of his 6 homes as a result.

We explained to [Redacted - Patron] our concerns for his safety in receiving cash deliveries and walking around with bags of cash, he thanked us for our concerns. We also told him that he is a valuable customer in BC Casinos and that 90% of the time he is what we consider to be the perfect player (using his casino account). We communicated that if he continues to associate with these individuals that are delivering cash he may be put in the same category and it could affect his ability to gamble in BC Casinos. [Redacted - Patron] understood and told us that he would not do this any longer. He stated that if he needs more cash in the future he would go and get it himself (earlier in the conversation he had indicated he has up to \$700K in cash at his home from casino disbursements).

Over the weekend an exchange cash/chips incident was generated at RRCR occurring 2015-APR-02 (2015-17415 refers). This incident details [Redacted - Patron] redeeming \$550K in chips, placing the cash into a green bag and giving the cash to a [Redacted - Patron] [Redacted - Patron Interview Identifying] whom was in the company of an [Redacted - Patron Interview Identifying] (neither identified on the incident date as they had departed the casino).

[Redacted - Patron] was asked to explain who they were and why he gave them so much money. It took a moment for [Redacted - Patron] to recall then suddenly remembered what we were referring to.

[Redacted - Patron] explained that the male (described by [Redacted - Patron] as [Redacted - Patron]) is the manager of a jeweller in [Redacted - Patron Interview Identifying Information]. He stated he has spend millions at this jeweller over the past years. The money was for a 10 carat diamond ring and watch he purchased for his wife (whom accompanied him to the casino but waited in a lounge area while we spoke with [Redacted - Patron Interview Identifying] proceeded to show us a photo of the ring on his cell phone which appears substantial. Both the writer and LEE agreed that [Redacted - Patron] was telling the truth. The writer has overheard staff at RRCR talking about the substantial diamond [Redacted - Patron] had recently purchased for his wife.

Overall [Redacted - Patron] was very cooperative with us. He stated he is willing to meet with us anytime and that he would stop having cash delivered to him suggesting perhaps this will help control his spending.

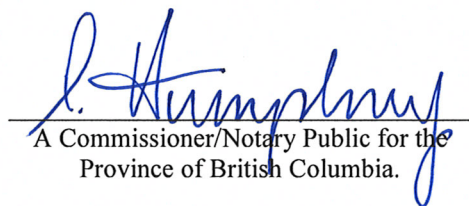
He was thanked again for his time and our meeting ended here.

Following the meeting RRCR AGM Daniel LAY was updated and thanked for allowing us to meet at RRCR.

BCLC corp sec management has been sent a copy of this report.

S.BEEKSMA
BCLC
Casino Investigations

THIS IS **EXHIBIT "U"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS

Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-JUN-28

Interview Time: 1030hrs

Interview Location: RRCR (MDB 13/14 private room)

BCLC Investigators: LEE, BEEKSMA , COUSINS

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron details:

Redacted - Patron Interview Identifying Information

Language:

Mandarin/English

Conditions:

Redacted - Patron is presently on full cash/chip conditions.

Recent Activity:

Redacted - Patron Interview has generated 505 individual LCT records dating back to 2010-MAR.

On 2017-MAR-17, as a result of a refused buy in at River Rock, the following comment added to

Redacted - Patron Interview's SID profile:

2017-MAR-17 RRCR Refused cash buy-in as per BCLC Directive. No further un-sourced cash buy ins to be accepted until further notice from BCLC AML Unit. Please advise patron to contact Consumer Services at 1-866-815-0222 to arrange an interview with the BCLC AML Unit. Please notify Daryl Tottenham, BCLC AML Unit by email if patron attempts further cash buy-ins at any site.

The focus of the interview will be establishing SOF/SOW along with enhanced CDD/KYC as well as incident specific questioning.

Redacted - Patron Interview occupation as a "Stakeholder Management" does not clearly aid in establishing SOF or SOW.

History:**Redacted - FINTRAC**

Redacted - Patron hold PGF accounts Redacted - Patron at River rock and account Redacted - Patron at Edgewater. He has been using his PGF account frequently since being placed on no un-sourced cash/chip conditions.

Redacted - Patron does not have any known casino associates of immediate concern.

Incidents to discuss:

2017-MAR-17 / 17-15818 / UFT-RRCR: Redacted - Patron met a vehicle described as a Redacted - Patron Interview Identifying Information along the South hotel driveway. He was driven to the West parkade, accessed his own vehicle then entered the casino where he produced \$40,000 in \$20 bills for purchasing chips. The casino determined that due to the circumstances of how Redacted - Patron acquired the money the buy in would be refused. The a/m directive was added to his profile as a result.

2017-MAR-18 / 17-19327 / UFT-EDGE: On this date Redacted - Patron attended the casino and presented \$50,000 in \$20 bills for buying in. As a result of the Directive added in relation to the River Rock incident the buy in was refused and the cash returned to Redacted - Patron.

Occupation:

Stakeholder Management - Redacted - Patron Interview Identifying Information

Specific Questions to Ask:

1. Confirm his address at Redacted - Patron Interview Identifying Information is current.
 - a. Does he own or rent?
 - b. Does he reside primarily in Canada?
2. What is the source of his wealth?
3. Confirm/clarify his occupation as a Stakeholder Management.
4. Educate him with respect to fact that his activities specific to the large volumes of funds is BCLC's primary concern.
5. When Redacted - Patron does bring cash into the casino where does it come from?
 - a. How does he make the arrangements?
6. Encourage Redacted - Patron to continue to utilize his PGF account as his primary source of funds to gamble with.
7. Has he heard about any underground casinos and if so, where?

RE 2017-MAR-17 / 17-15818 / UFT-RRCR:

1. Who was driving the [Redacted - Patron Interview] that dropped off the money to him [Redacted - Patron Interview Identifying Information]?
2. Where did the money come from?
3. How did he make the arrangements to get the money (delivery occurred just before 2100hrs)?

RE 2017-MAR-18 / 17-19327 / UFT-EDGE:

1. Was this the same \$40,000 River Rock would not accept?
2. Where did the additional \$10,000 come from?

Interview Results:

- [Redacted - Patron Interview Identifying Information] confirmed his local address on [Redacted - Patron Interview Identifying Information] is current (he added in English [Redacted - Patron Interview Identifying Information]).
 - It was learned throughout the conversation that in addition to numerous properties/businesses in China and the [Redacted - Patron Interview Identifying Information] has a property [Redacted - Patron Interview Identifying Information] and a property in [Redacted - Patron Interview Identifying Information].
 - All of [Redacted - Patron Interview Identifying Information] property is in his wife's name.
 - [Redacted - Patron Interview Identifying Information] typically spends his summers in [Redacted - Patron Interview Identifying Information] (is too hot), winters in [Redacted - Patron Interview Identifying Information] and fall and spring seasons in [Redacted - Patron Interview Identifying Information].
- [Redacted - Patron Interview Identifying Information] stated that when he first moved to Canada in 2008 he brought with him \$8 million dollars.
 - [Redacted - Patron Interview Identifying Information] added that it used to be much easier to bring money from China despite the \$50,000 per year per person rule. Anyone could bring money for you but recently the rules changed.
 - According to [Redacted - Patron Interview Identifying Information] early this year, China changed the rules and only individuals with the same family name (related by blood) can remove money from China for family overseas.
 - This is not an issue for [Redacted - Patron Interview Identifying Information] he has enough money in Canada.
- [Redacted - Patron Interview Identifying Information] confirmed his primary occupation as the [Redacted - Patron Interview Identifying Information] of a Broadcasting company called [Redacted - Patron Interview Identifying Information].
 - The company produces numerous Chinese television shows (soap operas and sitcoms).
 - He started this company in 2003 as a trade company and it evolved into what it is today.
 - Recently [Redacted - Patron Interview Identifying Information] stepped away from this company and allowed his son to take over the business. [Redacted - Patron Interview Identifying Information] showed investigators an online article on his phone that featured the company and included a picture of his son [Redacted - Patron Interview Identifying Information] (his son was born in 1987).
- [Redacted - Patron Interview Identifying Information] business ventures started in the early 1990's when he created a real-estate company. This company is still active and run by family members in China.
 - [Redacted - Patron Interview Identifying Information] owns numerous properties and businesses in China.
 - He showed investigators live surveillance feeds from approx. 7-8 of his properties in China that he could monitor from his smart phone (time stamp showed 0230hrs China time).
- [Redacted - Patron Interview Identifying Information] recently partnered with 3 of his close friends to invest in a Vancouver based [Redacted - Patron Interview Identifying Information].
 - They own 40% of the business.

- [Redacted - Patron] showed investigators multiple pictures of him sitting in a [Redacted - Patron Interview Identifying Information]
- At the conclusion of the interview [Redacted - Patron] told investigators that BCLC should set an example for "being green" and put a [Redacted - Patron] as the [Redacted - Patron Interview Identifying Information]
- [Redacted - Patron] gave investigators a sales pitch whereby he pointed out how much money would be saved on [Redacted - Patron Interview] if we switched to [Redacted - Patron Interview Identifying Information]
- [Redacted - Patron] also likes to play the stock market (freelance) in Canada. He stated he has lost "millions" in stock trades over the years.
- Regarding the money [Redacted - Patron] brings into the casino, [Redacted - Patron] advised he has more than enough money in Canada and the cash comes from either his credit card or debit card. [Redacted - Patron] showed investigators a number of cards in his wallet:
 - BMO Debit
 - 2 Master Cards
 - 2 Union Pay cards.
 - [Redacted - Patron] added that he can get \$10,000 per day from his debit card, up to \$30,000 per day from the Master Card and up to \$1 Million Chinese equivalent from the Union Pay cards. He added he cannot use the Union Pay cards "here" (the casino).
 - [Redacted - Patron] produced a stack of debit receipts from his pocket to show investigators which were for withdrawals of \$10,000 or more.
 - The machines usually disburse \$100 bills when he's withdrawing these amounts.
- [Redacted - Patron] started gambling because he is facilitated with numbers and formulas.
 - He became interested in Mini-Baccarat.
 - [Redacted - Patron] estimates he has lost approximately \$1.8 million all time gambling.

RE 2017-MAR-17 / 17-15818 / UFT-RRCR:

- As soon as investigators explained to [Redacted - Patron] there was one incident in particular we wanted to discuss he immediately knew what we were referring to.
- [Redacted - Patron] provided the following details regarding this incident:
 - [Redacted - Patron] advised that numerous people owe him money (up to \$3 million China currency combined).
 - He feels he is constantly chasing people to pay him back.
 - [Redacted - Patron Interview] showed investigators a text conversation with an individual in China who had placed a lien on his home due to money owed. The individual was asking [Redacted - Patron] to lift the lien so he could sell the property to pay him back.
 - [Redacted - Patron] only lends money to his friends, people he knows well.
 - He doesn't charge friends interest by if it is a business to business loan he does charge a little bit of interest.
- The \$40,000 in \$20 bills subject of this incident was money owed to him by a friend in China.
 - [Redacted - Patron] stated he had been trying to get a hold of the unnamed friend (in China) for 3 days and finally succeeded.
 - The friend (who was in China, [Redacted - Patron] was in Canada at the time) agreed to pass or [Redacted - Patron] s contact info to an associate locally that would arrange to get [Redacted - Patron] the money he owed him.
 - [Redacted - Patron] received a phone call from the local associate of his friend who asked where he was. When he told the male he was at the casino "on No. 3 road" he was instructed the money would be brought to him there.

- The male picked [Redacted - Patron] up along the side of the driveway across the street and drove him to his vehicle in the West parkade (footage supports this).
- [Redacted - Patron Interview] did not know the driver but described him as follows:

Redacted - Patron Interview Identifying Information

- [Redacted - Patron] advised he was somewhat nervous, not knowing this individual that he may try to take his money. [Redacted - Patron] described how he "sized him up" and came to conclusion that he would be able to overpower the driver if he needed to.
- [Redacted - Patron] stated he didn't even need the money but was happy to finally collect on the money his friend owed him.
- [Redacted - Patron] was upset his friend paid him with small bills. He stated he called his friend and asked him what is he supposed to do with all of the small bills? In the end [Redacted - Patron] was just happy to get his money back and willing to accept the bills.
 - [Redacted - Patron] added that he hates small bills as it takes too long to count it.
- [Redacted - Patron] rarely lends money out anymore because he is tired of chasing people to get paid back. He added that people are not as honourable as they used to be.

RE 2017-MAR-18 / 17-19327 / UFT-EDGE:

- [Redacted - Patron] confirmed this was the same money refused at River Rock and acknowledged that Edgewater refused it too.
- [Redacted - Patron] stated he added the additional \$10,000 from his own money

Interpreter required: Yes, LEE translating with BEEKSMA and COUSINS taking notes.

BCLC Conditions [Redacted - Patron] is on full sourced cash/chip conditions but consideration should be given to remove all conditions from his profile.

Investigator Comments:

[Redacted - Patron] was very respectful and open with investigators throughout the interview process. The general impression was that he was very truthful in his answers and was quick to provide supporting evidence to back up his claims (receipts, phone records, internet searches, photos on his phone etc).

It is clear that [Redacted - Patron] built himself up to be a very successful businessman, starting from his real estate company that he opened in the early 1990's. He generates revenue from multiple sources from both businesses and investments. The investigator believes that [Redacted - Patron] has more than satisfied source of wealth requirements.

[Redacted - Patron Interview Identifying Information] prefers to use his debit/credit cards or bank drafts for gambling over cash.

[Redacted - Patron Interview Identifying Information] added a recommendation that BCLC should consider allowing funds from his debit or credit card to be returned to the same card when he's finished gambling. He was told this cannot be done but BCLC is looking at the possibility of depositing sourced funds from his debit card to his PGF account. Presently the casino forces him to take that money back in cash then he has difficulty using it in the casino in the future.

[Redacted - Patron] showed investigators a picture he took of his home safe which showed 6-7 bundles of CDN \$100 bills which he stated is all money that was disbursed by the casino.

Redacted - Patron Interview was told that any cash the casino disburses he should be able to use for buying in within 48hrs with no issue.

The River Rock incident appears to have been a one-off and even Redacted - Patron Interview advised that was a unique circumstance that would not happen again.

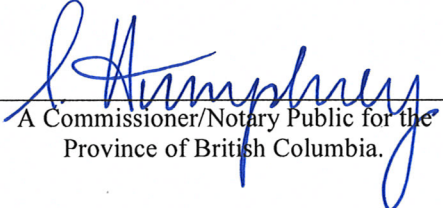
Redacted - Patron has demonstrated a willingness to use a variety of the cash alternatives offered by BC Casinos. Redacted - Patron has no associates of concern and generally keeps to himself in BC Casinos.

Given what was learned in the interview, supported by casino records, the investigator believes consideration should be given to remove Redacted - Patron from the conditions list. He is already on the list of HRP's and will continue to be monitored along with regularly scheduled reviews of his activity in the casino.

A copy of this summary has been sent to BCLC AML Projects Manager Daryl TOTTENHAM for review.

S.BEEKSMA
BCLC
AML Investigations

THIS IS **EXHIBIT "V"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC Interview Intelligence Summary

Individual interviewed:

NAME [Redacted - Patron
Interview Identifying
Information]
SID # [Redacted - Patron
Interview Identifying
Information]
Interview Date: 2015-SEP-29
Interview Time: 1405hrs-1435hrs
Interview Location: RRCR (Private room in VIP Salon)
Language spoken: Mandarin (LEE translating)
BCLC iTrak file: 2015-50711

Investigators:

LEE, Stone
BEEKSMA, Steve

Synopsis:

On the afternoon of 2015-SEP-26 an email was received from BCLC Consumer Service (Sales Force case 02095966). Edgewater employee Sam PARK was calling on behalf of the above noted patron informing that he wanted to set up a time to meet with BCLC investigators as per [Redacted - Patron] s SID comments.

BCLC Investigator LEE called [Redacted - Patron Interview] to set a date/time that worked for him. [Redacted - Patron] advised he did not want to go to BCLC's Vancouver office and was more comfortable going to River Rock (RRCR). BCLC investigator BEEKSMA confirmed with RRCR AGM Rishi KHAIRA that he was OK with BCLC conducting the interview at RRCR.

Working with Executive Host Lisa GAO and KHAIRA, 2015-SEP-29 @ 1400hrs was agreed on as the interview date/time. GAO arranged for the interview to take place in one of the private gaming rooms in the casinos VIP Salon (tables 13/14). Investigator BEEKSMA confirmed with investigator LEE he was available to assist with translation.

On 2015-SEP-29 at approx 1405hrs investigator BEEKSMA along with investigator LEE attended to the private room as previously arranged. [Redacted - Patron] was escorted to the room by GAO and introductions were made (business cards for both investigators provided to [Redacted - Patron] and [Redacted - Patron] was thanked for taking the time to meet with us.

Conditions surrounding [Redacted - Patron] s inability to use un-sourced cash/chips were explained to him. He was educated regarding casino PGF accounts and acknowledged he has used them previously. It was learnt that [Redacted - Patron] had approx \$60K in RRCR chips in his home.

The interview lasted approx 30 minutes and [Redacted - Patron] remained respectful (but reserved) throughout.

The following points of interest were learnt from [Redacted - Patron]

Regarding the un-sourced cash:

[Redacted - Patron] was unwilling to discuss anything with regard to this topic.

-He was asked where the cash comes from that he often uses to gamble with [Redacted - Patron] went on an unrelated rant regarding difficulties he's encountered when trying to deposit verified winnings to his PGF account in the past. This was likely due to a misunderstanding with regards to verified winnings and beginning his play with un-sourced chips.

-Next, [Redacted - Patron] was specifically asked if he could talk about where the \$20 bills come from that he has been known to use for gambling. [Redacted - Patron] indicated he was not comfortable with and would not be discussing this or any related lines of questioning. He stated he would follow the conditions but would not be talking about cash deliveries, source of cash, persons involved etc.

[Redacted - Patron]'s reluctance to talk about this was discussed between Investigators BEEKSMA and LEE following the interview. LEE did not feel [Redacted - Patron]'s reluctance was out of fear but more so that they are personal and direct questions that he is un-willing or uncomfortable discussing with us.

[Redacted - Patron] did admit he has "borrowed" money in the past.

[Redacted - Patron Interview] was asked how he arranges to pay the money back in these instances. [Redacted - Patron] offered an indirect answer suggesting that "they" know when you win and "they approach you". He was not willing to discuss what happens when you lose.

-As a result of [Redacted - Patron]'s reluctance to talk a large portion of the interview template was passed over.

Issues with PGF accounts:

[Redacted - Patron]'s issue with regards to Bank Drafts is his account is a joint account with his wife. In order to obtain a bank draft the bank requires both [Redacted - Patron] and his wife present. [Redacted - Patron] was not clear if the issue was a matter of inconvenience or if he wanted to keep from his wife how much he's spending.

-At the casino the process of depositing the bank draft, withdrawing (buying in) and re-depositing funds to a PGF account it too time consuming, cash is faster. [Redacted - Patron] went on to say when as a player you are watching a game the ability to quickly buy in to begin wagering on a "hot" table is important.

Underground Casino(s):

[Redacted - Patron Interview] has heard of there being "underground" casinos in Richmond (more than one). [Redacted - Patron Interview] advised he has never been though.

-Investigators made it clear to [Redacted - Patron] that casinos not managed by BCLC are illegal and he could find himself in legal trouble if he is even in attendance at one. [Redacted - Patron] understood.

Education RE Conditions and [Redacted - Patron] options:

[Redacted - Patron Interview] advised he currently has approximately \$60,000 in RRRCR chips at his residence. [Redacted - Patron Interview] was advised that he will be updated by the casino with regard to what he can do with the chips he has at home.

-Other than the complications surround bank drafts detailed above (joint account with wife) [Redacted - Patron] accepts this as his only way to gamble.

-It was explained to [Redacted - Patron] that the casino has been asked to improve their tracking of players and if the casino can source his funds he can gamble with them.

[Redacted - Patron Interview] was informed of the casinos "abandoned chips" policy.

[Redacted - Patron Interview] was re-educated with regard to the terms of the conditions BCLC has imposed on him. He was informed that he will not be able to gamble with any un-sourced cash or chips and the casino, along with BCLC will need to be able to verify the source of his funds.

[Redacted - Patron] suggestions/comments:

-*Have a safety deposit box like set up for players to store chips in (abandoned chips explained as detailed above).

-Allow wire transfers direct from Hong Kong to the casino. [Redacted - Patron] claims this circumvents the Chinese Governments limitations on the amount of funds their citizens can take out of the China.

[Redacted - Patron] went on to explain that most players are wealthy but their money is in China. If BCLC could find a way for them to be able to wire it directly it would completely eliminate the need for players to use loan sharks.

Redacted - Patron indicated that if the casino offered credit it would be something he would be interested in as an alternative to cash.

-Without sighting specific examples Redacted - Patron believes some of "our" rules don't make sense and sometimes cause arguments between staff and patrons.

Redacted - Patron also believes "our" management style is killing the casino business.

Interviewer comments:

Redacted - Patron was somewhat uncooperative during certain aspects of the interview process. He was willing to discuss the flaws in BCLC's management style and quick to point out that our casino is empty because of it but was unwilling to discuss anything regarding the un-sourced cash he has been known to utilize (or the source of this cash).

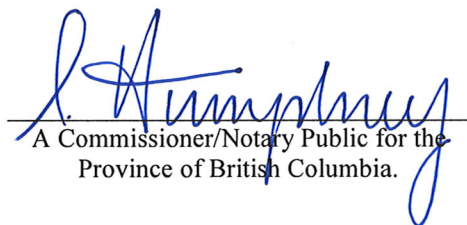
Some of the information obtained via this interview re-enforced some of what BCLC investigations have learnt via other patron interviews.

Redacted - Patron did offer some solutions/alternatives to cash for BCLC to consider including wire transfers direct from Hong Kong and an onsite chip storage solution for players.

BCLC's AML unit will need to provide direction to be passed to Redacted - Patron with regards to the \$60K in chips he has at his residence.

A copy of this interview summary has been sent via email to BCLC Corp Sec management Bruno GATTO and Kris GADE.

THIS IS **EXHIBIT "W"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ~~21st~~^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS

Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-AUG-15

Interview Time: 1300hrs

Interview Location: RRCR / Suite 3 (theatre)

BCLC Investigators: BEEKSMA, CHAN

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron to be educated on BCLC's role in BC Casinos, the need to conduct enhanced due diligence and reporting requirements.

Patron details:

Redacted - Patron Interview Identifying Information

Language:

Cantonese

Conditions:

Redacted - Patron is presently on full cash/chip conditions.

Recent Activity:

Redacted - has generated 137 individual LCT records dating back to 2012-JUN.

On 2017-AUG-11, as a result of a \$200K unsourced (small bills) buy in at River Rock, the following comment added to Redacted -'s SID profile:

2017-Aug-11 BCLC DIRECTIVE- No further un-sourced cash or chips pending interview with AML team. Please advise patron to contact consumer services and provide a contact number to arrange an interview. Daryl Tottenham, Manager, BCLC AML Programs

The focus of the interview will be establishing SOF/SOW along with enhanced CDD/KYC as well as incident specific questioning.

Redacted - Patron occupation as an "Owner Real Estate Company" does not clearly aid in establishing SOF or SOW.

History:

Redacted - FINTRAC

Redacted - hold PGF accounts 301 at River rock. He has been using his PGF account frequently since opening his account in late 2015.

Redacted - does not have any known casino associates of immediate concern.

Incident(s) to discuss:

2017-AUG-11 / 17-45640 / UFT-RRCR: Redacted - arrived at the casino with a shopping bag that contained \$200K in unsourced small denomination bills. After approx. 2.5 hours gambling Redacted - presented \$221K in chips for redemption. He was paid back \$200K in \$20 bills by the site and a cheque for the winnings (\$21K)

Occupation:

Owner Real Estate Company (no company info).

Specific Questions to Ask:

1. Confirm his address at Redacted - Patron Interview Identifying Information is current.
 - a. Does he reside primarily in Canada?
2. What is the source of his wealth?
3. Confirm/clarify his occupation as an Owner, Real Estate Company.
 - a. Request a company name.
4. Educate him with respect to fact that his activities specific to the large volumes of unsourced/small bills is BCLC's primary concern.
5. When Redacted - Patron does bring cash into the casino where does it come from?
 - a. How does he make the arrangements?
6. Encourage Redacted - Patron to continue to utilize his PGF account as his primary source of funds to gamble with.
7. Has he heard about any underground casinos and if so, where?

RE 2017-AUG-11 / 17-45640 / UFT-RRCR:

1. Where did he acquire the \$200K in unsourced small bills?
2. How did he make the arrangements to get the money?
3. Educate Redacted - Patron regarding BCLC's concerns surround the source of these funds.

Interview Results:

- [Redacted - Patron Interview] confirmed his address at [Redacted - Patron Interview Identifying Information] is current.
- [Redacted - Patron Interview] confirmed the 778 phone number we have on file is outdated. There was an issue with his number being issued to another individual by the carrier. His new number is: [Redacted - Patron Interview Identifying Information]
- [Redacted - Patron Interview] clarified his company was an investment company named [Redacted - Patron Interview] (sounds like).
 - [Redacted - Patron Interview] made a phone call to someone (on speaker phone) and got the English translation of the company which the person on the other end called [Redacted - Patron Interview]
 - When asked [Redacted - Patron Interview] stated this individual he called is his Realtor and his name is [Redacted - Patron Interview Identifying Information]
 - No matches for name/number found in iTrak.
 - Internet search located a match for both name and number for a [Redacted - Patron Interview] a realtor for [Redacted - Patron Interview Identifying Information]
 - The impression was that [Redacted - Patron Interview] used this company to aid in getting his permanent residency in Canada.
 - He stated he has since closed this company.
- [Redacted - Patron Interview] has family in Canada but splits his time between China and Canada as he still has business interests in China.
- BCLC's concerns surround the source of funds; particularly such a large volume of unsourced small denomination bills was explained to [Redacted - Patron Interview]
- [Redacted - Patron Interview] is well aware of how PGF accounts work (he has used them frequently in the past).
 - Some other options [Redacted - Patron Interview] may not be aware of were explained to him, IE: cash and win (credit card), debit at the cage and wire transfer.
- [Redacted - Patron Interview] advised he has not heard of or attended any underground or unregistered casinos.
 - [Redacted - Patron Interview] was educated that these establishments are illegal and potentially unsafe.

RE 2017-AUG-11 / 17-45640 / UFT-RRCR:

- [Redacted - Patron Interview] stated he made arrangements with a MSB to get the \$200K he presented for buying in this incident date.
 - He could not recall then name but stated it was on No. 3 road in Richmond, near the Skytrain and across from a pizza place.
 - The MSB told him that they could do a wire transfer but it would take a couple days. If he took cash he could get the money immediately so he took the cash.
 - He did not request or specify preferred denominations and was given the small bills noted in the incident file.
- [Redacted - Patron Interview] stated that he called a manager at the casino named "GAO" to advise that he was coming with \$200K. According to [Redacted - Patron Interview] this manager told him that it is his first time so it will be no issue bringing the money in.
 - The only manager at RRCR named GAO known to the investigator is the Director of VIP Guest Relations Lisa GAO.
- [Redacted - Patron Interview] acknowledged that the casino paid him out using \$20 bills. He advised that this money has since been deposited into a joint account he holds with his daughter (a CDN F/I).

Interpreter required: Yes, CHAN translating with BEEKSMA taking notes.

BCLC Conditions: [Redacted Patron] is on full sourced cash/chip conditions.

Investigator Comments:

[Redacted Patron] only had one incident of note that caused immediate escalation to full sourced cash conditions due to his ability to access such large amounts of unsourced funds.

[Redacted Patron] has demonstrated that he is capable and willing to utilize his PGF account as a method of bringing funds into the casino.

[Redacted Patron] was informed that unless he is updated otherwise, he will only be allowed to buy in at BC Casinos with sourced funds (all options explained to him) and he seemed fine with this.

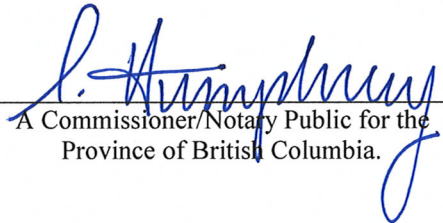
The investigators recommends he remain on source cash/chip conditions.

A copy of this summary has been sent to BCLC AML Projects Manager Daryl TOTTENHAM for review.

S.BEEKSMA
BCLC
AML Investigations

THIS IS **EXHIBIT "X"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-AUG-14

Interview Time: 1130hrs

Interview Location: RRCR (Suit 1, theatre box)

BCLC Investigators: LEE, BEEKSMA

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos. BCLC's role in the conduct and manage of BC Casinos was explained to Redacted Patron along with BC Casinos reporting requirements to other branches of government.

Patron details:

Redacted - Patron Interview Identifying Information

Language:

Mandarin/English

Conditions:

Redacted Patron Interview is presently on full cash/chip conditions.

Recent Activity:

Redacted Patron has generated 90 individual LCT records dating back to 2015-JUN.

On 2017-AUG-09, as a result of a refused buy in at River Rock, the following comment added to Redacted Patron's SID profile:

2017-AUG-09 ***BCLC DIRECTIVE*** Effective immediately, patron is not allowed to buy-in at any BCLC site with "un-sourced" cash (all cash without a bank or ATM withdrawal slip) or "un-sourced or borrowed" chips until further notice. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview to discuss further. Daryl Tottenham, Manager AML Programs, BCLC AML Unit.

The focus of the interview will be establishing SOF/SOW along with enhanced CDD/KYC as well as incident specific questioning.

Redacted - Patron occupation as a Redacted - Patron Interview Identifying Information does not clearly aid in establishing SOF but may help SOW.

History:

Redacted - FINTRAC

Redacted - Patron holds PGF accounts Redacted - Patron at River Rock. She has been using her PGF account frequently since being she opened it in 2017-MAR.

Redacted - Patron is linked to 23 individuals as casino associates.

Incidents to discuss:

Redacted - Patron UFT-RRCR: Redacted - Patron met a vehicle described as a Redacted - Patron Interview Identifying Information along the resort driveway. She opened the front passenger door and retrieved a Redacted - Patron bag that contained \$30,000 in \$100 bills that she attempted to use to buy in. The casino determined that due to the circumstances of how Redacted - Patron acquired the money the buy in would be refused. The a/m directive was added to her profile as a result. Redacted - Patron left the casino with Redacted - Patron Interview Identifying Information and returned 10 minutes later and attempted to buy in again (with the same money).

2017-AUG-08 / 17-45120 / UFT-RRCR: On this date a female associate of Redacted - Patron was identified as Redacted - Patron Interview Identifying Information conducted \$37,500 in cash buy ins. At least a portion of the cash was suspected of being on behalf of Redacted - Patron Interview Identifying Information were seen entering the washroom together after which Redacted - Patron presented \$15,000 in \$20 bills for buying in. Upon receipt of the chips Redacted - Patron Interview Identifying Information returned to the washroom together. Soon after Redacted - Patron was seen holding a handful of chips.

Occupation:

Redacted - Patron Interview Identifying Information

Specific Questions to Ask:

1. Confirm her address at Redacted - Patron Interview Identifying Information is current.
2. What is the source of her wealth?
3. Confirm/clarify her occupation as a Redacted - Patron Interview Identifying Information (where is the company based out of?).
4. Educate her with respect to fact that her activities specific to the large volumes of funds being delivered along the driveway is BCLC's primary concern.
5. When Redacted - Patron does bring cash into the casino where does it come from?
 - a. How does he make the arrangements?

[REDACTED]

- Review of her LCT records suggest this may have occurred on [REDACTED] (LCT 20170043327). On this date she left the casino with up to \$51,500 in cash disbursed to her. It would not be unusual for her to have money stored at her residence.
- Post interview investigators spoke with RRCR VIP Guest services [REDACTED - Patron Interview Identifying] to update on [REDACTED - Patron] s status. [REDACTED - Patron] indicated the [REDACTED - Patron] does tend to play on multiple tables, including in the Dogwood room. [REDACTED - Patron] admitted that it is very difficult for tables staff to track players in Dogwood due to the pace and number of players per table. This corroborates [REDACTED - Patron] statement about not being able to deposit her winnings, forcing her to take cash home.
- [REDACTED - Patron] added that if she felt like she was doing something wrong she would have made a greater effort to hide it.
 - She added that she knows people meet cash lenders at the Costco parking lot to evade casino cameras; this was her money so she was not concerned.
- It took a moment for [REDACTED - Patron] to recall exiting the casino with [REDACTED - Patron Interview Identifying] but when investigators mentioned the name [REDACTED - Patron] she remembered.
 - [REDACTED]
 - She added that "we know what [REDACTED - Patron] is into" and "she didn't want to discuss that" but that "we know". The impression was that [REDACTED - Patron] was hinting that [REDACTED - Patron] is into some illegal or questionable things.

RE [REDACTED] UFT-RRCR:

- [REDACTED - Patron] could not recall [REDACTED - Patron] s Chinese name but did recall entering the washroom with her.
 - She added that she knows many players at RRCR, most of them by their English first names, not their Chinese names.
 - Post interview [REDACTED - Patron] walked by a table in the Salon and said hello to a female patron she referred to as [REDACTED - Patron]

➤ [REDACTED]

➤ [REDACTED]

➤ [REDACTED]

➤ [REDACTED]

- [REDACTED - Patron] added that she does not like lending people money as it is too much trouble chasing people to get her money back.

○ [REDACTED]

➤ [REDACTED]

RE Underground casinos:

- [Redacted - Patron] was asked what she could tell investigators about underground casinos. [Redacted]
- [Redacted]
- She stated no cash is on site, everything is credit/receipts to be settled on a later date.
- When you arrive they take your BCDL and make a phone call to get approval for credit.
- [Redacted]
- [Redacted]
- If you lose you get 10% off you debt if you pay in the first week. [Redacted] did not specify but interest likely kicks in after the week is up.
- If you win you are issued a receipt and the organizers will pay you with a week, always in \$20 bills.
- [Redacted]
- One player came to mind: [Redacted - Patron Interview Identifying Information] was interviewed by investigators and was on full conditions prior to enrolling in the VSE program recently.
- It was learned in the interview that [Redacted]
- [Redacted] is not linked to [Redacted] as an associate but is linked to an associate of [Redacted - Patron Interview Identifying Information]
- [Redacted - Patron] stated that as she understands the underground casino is run by people from [Redacted]
- A former [Redacted - Patron Interview Identifying Information] came to mind.
- [Redacted] was provincially banned by BCLC for assault and never returned to BC Casinos after it expired in 2015-NOV.
- [Redacted] has an [Redacted - Patron] on file and previously used an [Redacted] address.
- [Redacted - Patron] was cautioned that these underground casinos can be dangerous and that investigators have heard stories of assaults and criminal activity that could put her in danger.

Interpreter required: Yes, LEE translating with BEEKSMA taking notes. [Redacted - Patron] did speak some broken English; enough for the investigator to have a conversation with her.

BCLC Conditions [Redacted - Patron] is presently on full sourced cash/chip conditions but consideration could be given to remove her. [Redacted - Patron Interview] s profile has been updated to indicate she no longer needs to call BCLC to set up an interview.

Investigator Comments:

[Redacted - Patron] was very cooperative with investigators and seemed generally truthful.

Investigators are satisfied that the incident that resulted her being placed on conditions (the \$30,000 in \$100's) is of little concern. This likely was her money that she arranged to have dropped off to her.

Review of [Redacted - Patron] s recent casino history confirms she frequently uses her PGF account and rarely arrives with large volumes of unsourced cash to buy in with. Investigators believe the risk of a repeat incident is low.

[Redacted - Patron] also provided some valuable intel regarding the underground/unregistered casinos and the people behind them.

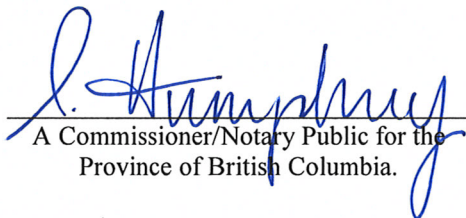
Consideration should be given to remove [Redacted - Patron] from the BCLC-AML Conditions list to be monitored moving forward.

If her behaviour changes and she is classified to a higher risk level she could be placed back on conditions.

A copy of this summary has been sent to BCLC AML Projects Manager Daryl TOTTENHAM for review.

S.BEEKSMA
BCLC
AML Investigations

THIS IS **EXHIBIT "Y"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd

A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-APR-04

Interview Time: 1400hrs-1445hrs

Interview Location: RRCR (private room 13/14)

BCLC Investigators: Stone LEE, Steve BEEKSMA, Lynn COUSINS

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron details:

Redacted -
Patron Interview
Identifying
Information

Language:

Mandarin/English

Conditions:

Redacted - Patron is currently under sourced cash conditions.

Recent Activity:

Redacted - Patron has generated 48 individual LCT records dating back to 2016-NOV. Most of Redacted - Patron Interview's notable activity has occurred in 2017-MAR.

On 2017-MAR-28 Redacted - Patron was placed on full cash conditions with the following comment added to his SID profile:

2017-MAR-28 ***BCLC DIRECTIVE*** Effective immediately, patron is not allowed to buy-in at any BCLC site with "un-sourced" cash (all cash without a bank or ATM withdrawal slip) or "un-sourced or borrowed" chips until further notice. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview to discuss further. Daryl TOTTENHAM, Manager AML Programs, BCLC AML Unit

The focus of the interview will be establishing SOF and SOW along with enhanced CDD/KYC.

[Redacted - Patron Interview] occupation of a "university student" at [Redacted - Patron] does not aid in establishing SOF or SOW.

History:

Redacted - FINTRAC

Buy in amounts have ranged from \$20,000 to in excess of \$100,000 per visit, in large part small denomination bills.

Since [Redacted - Patron] first LCT in 2016-NOV he has conducted a combined total of \$1.6 mil in buy ins and \$1.5 in disbursements. Some of the cash used for buying in may have been recycled funds.

2017-18000 (EDGE) 2017-MAR-27 [Redacted - Patron] was observed meeting/associating with [Redacted - Patron] and later both were inside [Redacted - Patron] vehicle for an extended length of time.

Occupation:

University Student

Company:

[Redacted - Patron Interview]

Specific Questions to Ask:

1. Confirm his address at [Redacted - Patron Interview Identifying Information] is current.
 - a. Does he own or rent?
2. What is the source of his wealth?
3. Confirm his occupation/source of income including how long he has been working there and where the business is located and what [Redacted - Patron] role or job title is.
4. Educate him with respect to fact that his activities specific to the large volumes of unsourced funds is BCLC's primary concern.
5. Impress upon the patron that money in small denominations is consistent with being related to criminal activity.

- a. Where does the cash come from?
 - b. How does he make arrangements to get it?
6. Encourage [Redacted - Patron] to open a PGF account. Review of [Redacted - Patron Interview]s recent LCT activity shows he has used a PGF account previously (@EDGE).
 7. Caution [Redacted - Patron Interview] against using associates to conduct transactions for him. Should this behaviour continue BCLC might put further restrictions on his ability to buy in at BC Casinos.
 8. Has he heard about any underground casinos and if so, where?

2017-18000 (EDGE) 2017-MAR-27:

1. How does he know [Redacted - Patron]?
 - a. Did he receive the money for his second buy in from [Redacted - Patron] \$50K in an orange bag?
 - b. Has he used [Redacted - Patron] for getting money previously?
2. How does he know [Redacted - Patron Interview Identifying]?
 - a. Did he receive the \$20K in \$20's from [Redacted - Patron] in the washroom?
 - b. Where did this money come from?

BCLC Conditions: To remain on sourced cash conditions (Cash with receipt, sourced to disbursements or bank draft or other negotiable instrument from a recognized financial institution).

Interview Results:

- [Redacted - Patron] confirmed he is in Canada alone and is enrolled in [Redacted - Patron] in the area of "arts" with classes on Tuesday, Thursday and Friday afternoons.
- His SOW is from his Mom and Dad, primarily his mother (both parents are in China).
- According to [Redacted - Patron], his father is involved in an Export business in China and his mother manages a furniture lease or rental company (also in China). The father import business sounds like [Redacted - Patron] when spoken/translated to English.
- [Redacted - Patron] stated his father gambles at River Rock when he visits. His fathers name sounds like: [Redacted - Patron Interview Identifying Information]
- [Redacted - Patron]s mother supports [Redacted - Patron] by wiring money from China to him in Canada for living expenses, purchasing real estate, investments and tuition.

- [Redacted - Patron] stated that his mother wires money from her Chinese account to the Chinese account of a local individual.
- [Redacted - Patron] described that there is a "main guy" and his assistant (he knows as [Redacted - Patron] that he meets with to receive the CDN equivalent of what his mother sends him. He added that the "main guy" drives a [Redacted - Patron Interview Identifying Information]
 - Later in the interview it was learned that the "main guy" is [Redacted - Patron Interview Identifying Information] and the assistant is [Redacted - Patron Interview Identifying Information].
- [Redacted - Patron] recalled that on one occasion when his mother sent money [Redacted - Patron Interview Identifying Information] sent him to a currency exchange business located on [Redacted - Patron Interview Identifying Information] in Richmond. [Redacted - Patron] spoke the name of this business in Chinese which investigator LEE confirmed is the Chinese name displayed outside of [Redacted - Patron Interview Identifying Information]
 - [Redacted - Patron] stated that on this occasion he met with a female at the currency exchange place who provided him with the money arranged through [Redacted - Patron Interview Identifying Information]. He did not meet with [Redacted - Patron Interview Identifying Information] on this occasion.
- [Redacted - Patron] advised that typically when his mother sends him money it is either delivered to his residence or he meets [Redacted - Patron Interview Identifying Information] at an agreed on location.
- [Redacted - Patron] advised that when he returns to China for a visit he always brings money back with him (up to \$30K). He confirmed that he exchanges his Chinese currency to Canadian in China (before returning to Canada). He added that in China he always receives \$100 bills but that the currency exchange places in Canada only give him small bills.
- [Redacted - Patron] advised that [Redacted - Patron Interview Identifying Information] told him that if he needs money for purchasing real estate or larger investments he can provide him with large bills but if its just money for the casino he will get small bills.
 - [Redacted - Patron] did not believe there is any benefit for him in taking small bills (IE a better rate).
 - He believes the local currency exchange place makes money on the exchange rate. Any service charge is built into the exchange rate.
- [Redacted - Patron] stated he does borrow money from his friends if he runs out but he does not use "loan sharks" and there are no interest fees.
- [Redacted - Patron] confirmed the [Redacted - Patron Interview Identifying Information] is his vehicle.
 - The [Redacted - Patron Interview Identifying Information] and the [Redacted - Patron Interview Identifying Information] are his friend: [Redacted - Patron Interview Identifying Information] vehicles.
 - [Redacted - Patron] added that he and his friends often share vehicles "for fun" (to try different cars).
- [Redacted - Patron] stated that he had introduced his friend [Redacted - Patron Interview Identifying Information] but couldn't be sure if [Redacted - Patron] had used [Redacted - Patron Interview Identifying Information] service.
- [Redacted - Patron] showed investigators an application on his cell phone which was a list view of his Chinese account showing multiple transfers to and from the account. It appeared to be to and from multiple sources, some repeated often (based on the icons).

- [Redacted - Patron Interview] was encouraged to use his PGF account. He stated he used to get \$100 bills which he could deposit into his bank but lately he's only been getting \$20 bills.
 - He added that the bank would only allow him to deposit \$7-8,000 in \$20 bills.
- [Redacted - Patron] advised that he has been approached in the casino by individuals offering to lend him money, asking to borrow money and offering to take him to "private casinos".
 - He confirmed none of these requests came from a casino employee and he has not accepted any of these offers.
- [Redacted - Patron] was told that money in small denominations is consistent with being related to criminal activity. Investigators expressed concern for him and his family and cautioned [Redacted - Patron] to be careful who he is dealing with and suggested he try and control his spending in the casino.
 - [Redacted - Patron Interview] mentioned earlier in the conversation that his mother knows he likes to go to the casino but is unaware how much he spends.

RE: 2017-18000 (EDGE) 2017-MAR-27:

- It was during the conversation surrounding this incident that the connection between [Redacted - Patron Interview Identifying], [Redacted - Patron] and where [Redacted - Patron] acquires his CDN money from was learned.
 - [Redacted - Patron] referred to [Redacted - Patron] by a nickname [Redacted - Patron Interview Identifying] that translates to [Redacted - Patron].
 - Investigator LEE recalled being involved in an interview with a Gateway VIP employee named [Redacted - Patron Interview Identifying]. During that interview, [Redacted - Patron] referred to [Redacted - Patron Interview Identifying Information].
 - As per [Redacted - Patron]'s casino profile he goes by the Alias: [Redacted - Patron Interview Identifying].
 - [Redacted - Patron] added he knows that [Redacted - Patron] is banned from the casino for "passing chips".
 - [Redacted - Patron Interview] stated that he transferred the CDN equivalent of \$70,000 but only received the initial \$50,000 from [Redacted - Patron Interview Identifying Information] instructed [Redacted - Patron] to go into the washroom where he received the additional \$20,000 from [Redacted - Patron].
 - When asked how he is able to get money on such short notice after business hours [Redacted - Patron] stated he is of the impression that [Redacted - Patron] always has money on hand.

Interpreter required: Yes, Investigator Stone LEE translating with BEEKSMA and COUSINS taking notes. [Redacted - Patron] speaks English as well and investigators were able to ask some questions in English.

BCLC Conditions: The investigator recommends that he remain on sourced cash conditions (cash with receipt, sourced to disbursements, bank draft or other negotiable instrument from a recognized financial institution).

These conditions and all of [Redacted - Patron Interview] options for bringing money into the casino were clearly explained to [Redacted - Patron].

Investigator Comments:

[Redacted - Patron Interview Identifying] remained respectful throughout the interview. The general impression was that [Redacted - Patron Interview Identifying] was very honest with investigators and he answered all questions asked of him.

It seemed [Redacted - Patron] did not see that his methods of getting CDN money from his parents in China is out of the ordinary. The impression was this is a common way that parents overseas send money to their children attending university in Canada.

[Redacted - Patron Interview] was advised that moving forward he would need use an account and all cash will need to be accompanied by a receipt.

[Redacted - Patron] asked about his continued use of [Redacted - Patron] and was told that if a currency exchange place can provide a receipt with a denominational breakdown of the CDN currency received it would be accepted but he was encouraged to use his PGF account to avoid future issues.

[Redacted - Patron Interview] was also cautioned against using his friends to conduct buy ins for him or circumvent his conditions.

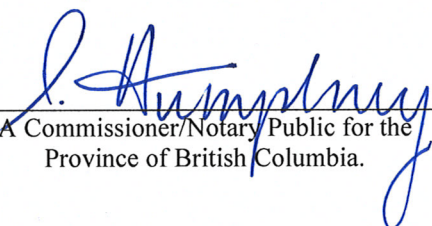
Steve Beeksma

BCLC

AML Investigations

THIS IS **EXHIBIT "Z"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS

Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-MAY-17

Interview Time: 1300hrs

Interview Location: RRCR (private room 13/14)

BCLC Investigators: Stone LEE, Steve BEEKSMA

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron details:

Redacted -
Patron Interview
Identifying
Information

Language:

Mandarin/English

Conditions:

Redacted - Patron is currently under SOF conditions.

Recent Activity:

Redacted - Patron has generated 26 individual LCT records dating back to 2016-APR-18. TIAN appears to be fairly new to BC Casinos.

On 2017-APR-12 Redacted - Patron was placed on SOF conditions with the following comment added to his SID profile:

2017-APR-12 BCLC Directive- Patron requires SOF (source of funds) interview for un-sourced cash buy-ins. Please document in an iTrak incident file, scan copy of interview into media file and advise the AML unit by email at [REDACTED] of the incident file. Daryl Tottenham, Manager AML Programs, BCLC.

The focus of the interview will be establishing SOF and SOW along with enhanced CDD/KYC.

Redacted - Patron Interview Information's occupation a "student" at Redacted - Patron Interview Identifying Information does not aid in establishing SOF or SOW.

History:

Redacted - FINTRAC

Buy in amounts have ranged from \$1,500.00 to just under \$32,160.00 per visit, in large part small denomination bills.

2017-20537 (RRCR) 2017-APR-09 Redacted - Patron arrived at the casino with a male associate Redacted - Patron Interview Identifying Information arrived onsite with Redacted - Patron in a Redacted - Patron Interview Identifying Information entered the facility (appeared that Redacted - Patron was carrying something under his jacket). They both went up to a hotel room on the 9th floor. Redacted - Patron exited the hotel room wearing Redacted - Patron's jacket and immediately conducted a cash buy in. \$16,880.00 (844x\$20.00).

2017-21338 (RRCR) 2017-APR-13: Redacted - Patron was observed exiting the hotel to meet up with a Redacted - Patron Interview Identifying Information to obtain a bag. Redacted - Patron obtained the bag and went directly to his room, then to the Salon to conduct a cash buy in. Redacted - Patron produced 100x\$10.00 & 1558x\$20.00 for a total value of \$32,160.00.

Occupation:

College Student

Company:

Redacted - Patron Interview Identifying Information

Specific Questions to Ask:

1. Confirm his address at Redacted - Patron Interview Identifying Information is current.
 - a. Does he own or rent?
2. Confirm the name and location of the college he's enrolled in.
 - b. Does he have a current student visa?
3. What is the source of his wealth?

4. Confirm his occupation/source of income.
 - a. If money is from parents overseas ask how she gets the money in Canada.
 - b. Ask for parents SOW.
5. Educate him with respect to fact that his activities specific to the large volumes of unsourced funds is BCLC's primary concern.
6. Impress upon the patron that money in small denominations is consistent with being related to criminal activity.
 - a. Where does the cash come from?
 - b. How does he make arrangements to get it?
8. Encourage [Redacted - Patron] to use his PGF account. Review of [Redacted - Patron]'s profile confirms he holds PGF account [Redacted - Patron] at RRRCR.
 - c. Explain his options moving forward.
7. Caution [Redacted - Patron] against using associates to conduct transactions for him. Should this behaviour continue BCLC might put further restrictions on his ability to buy in at BC Casinos.
8. Has he heard about any underground casinos and if so, where?

2017-20537 (RRRCR) 2017-APR-09:

1. What is his relationship with [Redacted - Patron Interview Identifying Information]?
 - a. How long have they known each other?
 - b. Who's hotel room was on the 9th Floor?
2. Where did the \$16,880.00 in \$20 bills come from?
 - a. Describe the circumstances of how he acquired the money.

2017-21338 (RRRCR) 2017-APR-13:

1. What did you receive from the [Redacted - Patron Interview Identifying Information]?
 - a. Who was the driver?
 - b. How did you know or meet the driver?

c. If cash was obtained, have you received cash from this driver in the past? Is he linked to a local business?

2. If the cash did not come from the [Redacted - Patron] where did he obtain all of the \$20's that were used in his cash buy in?
- 3.
4. SOF interview was conducted and [Redacted - Patron] stated the funds were from his father?

Extra Questions:

How long have you had a hotel room at the River Rock Casino?

How do you know [Redacted - Patron Interview]

How do you know [Redacted - Patron Interview Identifying Information] ?

BCLC Conditions: Post interview [Redacted - Patron] was changed from SOF interviews to sourced cash conditions (cash with receipt, sourced to disbursements or bank draft or other negotiable instrument from a recognized financial institution). These conditions were clearly explained to him.

Interview Results:

- [Redacted - Patron Interview Identifying Information] introduced himself to investigator BEEKSMA as [Redacted - Patron].
- [Redacted - Patron Interview Identifying Information] confirmed he no longer resides at the [Redacted - Patron Interview] address on his SID profile.
 - He was renting it but hasn't lived there in a "long time"
 - He has been living in River Rocks resort full time and has no fixed address since leaving the [Redacted - Patron Interview] address.
 - For the first few months [Redacted - Patron Interview] paid for the room but since then River Rock has been paying for his hotel room.
- [Redacted - Patron Interview Identifying Information] confirmed he is in Canada on a student visa.
 - He was/is enrolled at [Redacted - Patron Interview Identifying Information]
 - He used to go to the Richmond campus then went to the Down Town Vancouver campus but admitted he doesn't go to school much anymore.
- [Redacted - Patron Interview Identifying Information] has been in Canada for approx. 2.5 years. He has never worked since being here.
 - His father wires him money from Chinese account to Chinese account to support him while in Canada.
 - [Redacted - Patron Interview Identifying Information] uses money exchange places to convert the money wired from his father to CDN currency.
 - [Redacted - Patron Interview Identifying Information] was hesitant to talk about his father and his source of income in China as he didn't want to bring any unwanted attention or problems to his

father. It was explained to [Redacted - Patron] that investigators needed to be comfortable he is capable of gambling at the level he has been.

- [Redacted - Patron] stated his father is involved in a [Redacted - Patron] company.
- He doesn't know his exact role or position in the company.
- [Redacted - Patron] visited the factory when he was 2 years old and doesn't know what his father does there. This could suggest his father has been associated to this business for more than 20 years.
- [Redacted - Patron] stated his father has sent him \$180,000 to date (Casino records suggest it would be much more than that). This may be his most recent transfer amount.

- [Redacted - Patron] advised that he has used 5-6 different money exchange businesses.
 - He usually searches the Chinese classified websites like "VANSKY" or "VANPEOPLE" to find a money exchange place.
 - He will often call multiple ones to check if they have enough cash on hand before choosing which one he will use.
 - Often the MBS will deliver to him at no extra charge.
 - He stated they will even come to him with the CDN cash in hand and allow him to do the electronic transfer (using a smart phone) face to face.
 - He hesitated to name any of the businesses because he didn't want to bring any negative attention to them. Once it was explained that if they are a legitimate businesses they should have nothing to hide [Redacted - Patron] provided the name of "KINBOK" as one of the ones he's used.
 - The exchange places always provide him with small denomination bills.
 - He uses the money exchange places because he doesn't want to worry his father with how much he's spending (this didn't make much sense to investigators).
 - [Redacted - Patron] was asked if any money exchange places lend money. [Redacted - Patron] laughed at this adding an exchange requires money from both parties.
 - [Redacted - Patron] showed investigators multiple electronic transfer receipts or notifications on his cell phone that appeared to be currency exchange confirmations. It appeared to be in the form of a text message from sender "95533".
 - One showed \$51,000 Chinese currency to CDN and another showed \$180,000 Chinese currency to CDN.
- [Redacted - Patron] asked if he could use money from a MSB if it was accompanied with a receipt. He was told so long as it was an official/verifiable receipt he could use it.
- [Redacted - Patron Interview] did not know either [Redacted - Patron Interview Identifying Information] by their names when spoken.

RE: 2017-20537 (RRCR) 2017-APR-09:

- [Redacted - Patron] stated he met [Redacted - Patron] in the casino, gambling.
 - He added the he and [Redacted - Patron] are from the same town in China originally.
 - [Redacted - Patron Interview Identifying Information] went for dinner on this incident night. They went to a room on the 9th floor then entered the casino.
 - [Redacted - Patron] couldn't recall if it was his room or not (he stated he's stayed in multiple rooms on different floors in the resort).

- He admitted he was wearing [Redacted - Patron]'s jacket.
 - He stated he was cold and didn't want to look through his suitcases to find a jacket so [Redacted - Patron] lent him his.
 - The money inside the jacket was his. He laughed at the suggestion that the money was [Redacted - Patron Interview]'s adding that [Redacted - Patron] does not have money.
 - The money was obtained from a MSB.

RE: 2017-21338 (RRCR) 2017-APR-13:

- [Redacted - Patron Interview] did not know who the name of the person who was driving the [Redacted - Patron]
- He stated he looked familiar to him; likely from using the same MSB previously.
 - The cash came from a MSB.
 - The cash was indirectly from his father (as per SOF form).

Interpreter required: Yes, Investigator Stone LEE translating with BEEKSMA taking notes.

BCLC Conditions: The investigator recommends that [Redacted - Patron] be placed on sourced cash conditions (cash with receipt, sourced to disbursements, bank draft or other negotiable instrument from a recognized financial institution).

These conditions and all of [Redacted - Patron]'s options for bringing funds into the casino were clearly explained to him.

[Redacted - Patron]'s casino profile has been updated.

Investigator Comments:

[Redacted - Patron] inquired with investigators what he had done wrong to be placed on these conditions. He was told a number of factors contributed but it was primarily SOW and SOF issues.

[Redacted - Patron] was advised that moving forward he would need use an account and all cash would need to be accompanied by a receipt.

[Redacted - Patron] understood somewhat how PGF accounts work. It was suggested to him that he speak with RRCR VIP Director Lisa GAO to learn all of the options when it comes to PGF accounts.

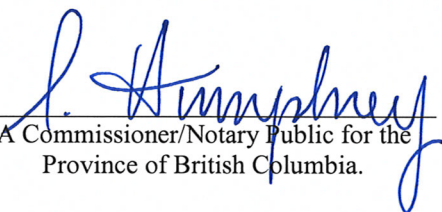
[Redacted - Patron Interview] was also cautioned against using his friends to conduct buy ins for him or circumvent his conditions and advised that if this type of behaviour is detected it could result in a suspension of play.

[Redacted - Patron] asked if he could accept chips from his friends and was told no.

S.BEEKSMA
BCLC
AML Investigations

THIS IS **EXHIBIT "AA"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS

Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-MAY-18

Interview Time: 1110hrs

Interview Location: RRCR (private room 13/14)

BCLC Investigators: Stone LEE, Steve BEEKSMA, Lynn COUSINS

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron details:

Redacted - Patron Interview Identifying Information

Language:

Mandarin

Conditions:

Redacted -
Patron

is currently under sourced cash conditions.

Recent Activity:

On 2017-MAY-17 Redacted - Patron was placed on full cash conditions with the following comment added to his SID profile:

2017-May-17 BCLC Directive: ***BCLC DIRECTIVE*** Effective immediately patron is not allowed to buy-in at any BCLC site with "un-sourced" cash (all cash without a bank or ATM withdrawal slip) or "un-sourced or borrowed" chips until further notice. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview to discuss further. Daryl Tottenham, Manager, BCLC AML Programs

The focus of the interview will be establishing SOF and SOW along with enhanced CDD/KYC and establishing Redacted - Patron's relationships with some of his casino associates.

History:Redacted -
Patron
Interview

has generated 81 individual LCT records dating back to 2013-SEP.

Redacted - FINTRAC

Buy in amounts have ranged from \$10,000 to in excess of \$80,000 per visit, in large part small denomination bills. Average or typical amounts have been in the \$30K range.

Incident summaries (STR's in past month):

2017-24864 (RRCR) 2017-APR-29: Redacted - Patron Interview Identifying Information bought in for \$23,000 (\$10K in \$20's).

2017-25075 (RRCR) 2017-APR-30: Redacted - Patron Interview Identifying Information arrived at the casino with his associate Redacted - Patron. He presented approx. \$30K in cash (\$20K in \$20's) Redacted - Patron was seen associating with Redacted - Patron Interview Identifying Information. Redacted - Patron Interview Identifying Information was suspected of receiving chips from Redacted - Patron in the washroom.

2017-26141 (RRCR) 2017-MAY-05: Redacted - Patron was seen coming from the bus loop behind the South parkade where he picked up a bag containing \$79K in \$20 bills used for buying in.

2017-28466 (RRCR) 2017-MAY-16: Redacted - Patron bought in for a total of \$108,760 (majority \$20's). Redacted - Patron arrived at the casino with Redacted - Patron and bought in for \$80,060 in \$20's (money inside a birthday themed gift bag). Later he was seen entering the washroom with Redacted - Patron and Redacted - Patron. It was suspected Redacted - Patron provided him with \$28,700 in mixed bills.

Occupation:

Redacted - Patron Interview Identifying Information

Company:Redacted - Patron Interview Identifying
Information**Specific Questions to Ask:**

1. Confirm his address on Redacted - Patron Interview Identifying Information is current.
2. What is the source of his wealth?
3. Confirm his occupation/source of income including how long he has been working there and where the business is located and what Redacted - Patron's role or job title is (if applicable).

4. Educate him with respect to fact that his activities specific to the large volumes of unsourced funds is BCLC's primary concern.
5. Impress upon the patron that money in small denominations is consistent with being related to criminal activity.
 - a. Where does the cash come from?
 - b. How does he make arrangements to get it?
6. Encourage [Redacted - Patron] to use his PGF account. Review of [Redacted - Patron Interview] s recent LCT activity confirms he holds PGF account 829 at RRCR.
7. Caution [Redacted - Patron] against using associates to conduct transactions for him. Should this behaviour continue BCLC might put further restrictions on his ability to buy in at BC Casinos.
8. Has he heard about any underground casinos and if so, where?

RE 2017-25075 (RRCR) 2017-APR-30:

1. How does he know [Redacted - Patron Interview Identifying Information] ?
2. How does he know [Redacted - Patron Interview Identifying Information]
 - a. Where did the money come from (\$30K)?

RE 2017-26141 (RRCR) 2017-MAY-05:

1. Who dropped off the bag of money behind the South parkade?

RE 2017-28466 (RRCR) 2017-MAY-16:

1. Where did the initial \$80K in \$20's come from? SOF form states from his home savings?
2. Confirm that [Redacted - Patron Interview] provided him with the second buy in (\$28K) in the washroom.

BCLC Conditions: To remain on sourced cash conditions (Cash with receipt, sourced to disbursements or bank draft or other negotiable instrument from a recognized financial institution).

Interview Results:

- [Redacted - Patron Interview] confirmed his address in Canada as noted above [Redacted - Patron Interview] in Vancouver).
 - He stated he has a wife and two kids that live primarily in Canada (they vacation in China every couple of years).
 - [Redacted - Patron Interview] spends a little more than half of the year in China.

- [Redacted - Patron Interview] stated his company name is not [Redacted - Patron Interview Identifying Information] as noted on his iTrak profile.
- He stated this is the name of his good friends company.
 - [Redacted - Patron Interview Identifying Information] His friends named sounds like [Redacted - Patron Interview Identifying Information]
 - [Redacted - Patron Interview Identifying Information] has an associate in iTrak named [Redacted - Patron Interview Identifying Information] which could be the friend he was referring to but the occupation does not match.
 - He assumed that when he and his friend first registered in the casino the staff must have reversed or made an error when entering their company names.
 - He confirmed his company is involved in [Redacted - Patron Interview Identifying Information] business.
 - He is the owner of the company.
 - The name of his company sounds like [Redacted - Patron Interview Identifying Information].
 - He has been associated to this business for over 20 years.
 - He registered the business in 1998 (but it was operational before registering).
 - [Redacted - Patron Interview Identifying Information] has no businesses in Canada.
 - His and his friends company are two separate businesses but have dealings with one another.
- [Redacted - Patron Interview Identifying Information] stated that he stores money at his residence, usually large denomination bills.
- He added that when friends/family come to visit they bring CDN cash with them (large bills). When the return to China they leave the CDN with him and he wires the funds in Chinese currency to their Chinese bank accounts.
 - He does not often use the money at home to gamble with because his wife will notice it missing and he does not want his wife to know he gambles.
 - Instead, he borrows money from any one of his multiple "friends" then pays them back in China.
 - [Redacted - Patron Interview Identifying Information] was unwilling to name any of his "friends" that he borrows from in Canada.
 - He stated he has multiple friends in Canada that are legitimate businessmen.
 - [Redacted - Patron Interview Identifying Information] Examples of these individuals businesses provided by [Redacted - Patron Interview Identifying Information] as follows:
 - Grocery Store
 - Farms
 - Fruit Juice
 - Spa
- [Redacted - Patron Interview Identifying Information] does not borrow money from strangers or from random people in the casino, only from friends/people he knows. He described this type of scenario as shared play or pooled money.
- [Redacted - Patron Interview Identifying Information] has heard of unregistered or underground casinos but has never gone. He has received offers in the past to go to one but declined as he feels they are

not safe [Redacted - Patron Interview] couldn't guess as to where they may be located as he had never been.

RE 2017-25075 (RRCR) 2017-APR-30:

- [Redacted - Patron Interview] stated that he and [Redacted - Patron Interview Identifying] are good friends from [Redacted - Patron Interview Identifying].
- He claimed he does not know who [Redacted - Patron Interview Identifying] is.

RE 2017-26141 (RRCR) 2017-MAY-05:

- [Redacted - Patron Interview] claimed that he wanted more cash to gamble in the casino and called his "friend" to see if he could borrow some.
- He stated his friend lives close to the casino so he decided to walk to his residence (he did not drive this date).
- His friend did not want him to walk so drove to the casino to meet [Redacted - Patron Interview]. They ended up meeting behind the South parkade near the bus loop.
 - [Redacted - Patron Interview] was not sure on the amount he borrowed but described it as multiple bundles of \$10K.
 - His friend is a legitimate businessman but [Redacted - Patron Interview] was unwilling to provide his friend's name.

RE 2017-28466 (RRCR) 2017-MAY-16:

- When asked where the \$80K in \$20 bills from his original buy in came from [Redacted - Patron Interview] advised he wasn't sure. He was reminded this incident occurred just 2 days ago then he answered he thinks he borrowed from his friend.
- When questioned about the answer he gave of "money from home" on his SOF form [Redacted - Patron Interview] stated that was just a reflex answer he gave without really thinking about it.
- [Redacted - Patron Interview] was questioned about the suspected cash pass in the washroom from [Redacted - Patron Interview Identifying].
 - [Redacted - Patron Interview] stated we have this wrong.
 - He didn't even need this cash as he still had chips. It was his money and he had it on him all along.
 - [Redacted - Patron Interview] explained that sometimes when he feels that he is on a losing streak he will buy in again to reset and start fresh again (superstition).
- [Redacted - Patron Interview] was asked what was the purpose in three men entering the washroom together for less than a minute if not to pass cash.
 - He admitted that they went into the washroom to smoke.
 - The reason it was so short was that they've been caught before and didn't want to get into trouble for smoking in the washroom.
 - He explained that when one associate/player enters the washroom it is a sign to others that it is time for a "smoke break" so often multiple people will follow.
 - [Redacted - Patron Interview] still claimed to not know who [Redacted - Patron Interview] was.

- Investigators came prepared with a cropped image of [Redacted - Patron]'s passport showing just his name in Chinese characters. This was shown to [Redacted - Patron] and he still claimed to not know [Redacted - Patron].
- [Redacted - Patron] added that maybe if he saw his face he may know him but doesn't know him by name.
- He stated that if he had any kind of dealings with [Redacted - Patron] he would know his name.
- [Redacted - Patron] knows many people in the casino by face but does not know everyone's name.

Interpreter required: Yes, Investigator Stone LEE translating with BEEKSMA and COUSINS taking notes.

BCLC Conditions: The investigator recommends that he remain on sourced cash conditions (cash with receipt, sourced to disbursements, bank draft or other negotiable instrument from a recognized financial institution).

These conditions and all of [Redacted - Patron]'s options for bringing funds into the casino were clearly explained to [Redacted - Patron].

Investigator Comments:

[Redacted - Patron] was respectful with investigators but unwilling to provide any names of his "friends". The general impression was that [Redacted - Patron] was not being truthful with investigators, particularly when asked about incident specific details IE: the cash delivery behind the south parkade and his not knowing whom [Redacted - Patron] is.

[Redacted - Patron] asked what he could do with all of the large denomination cash he has stored at his residence. Investigators suggested he deposit it to his CDN bank [Redacted - Patron] did not like this because he stated the banks ask too many questions. He was reminded that BC Casinos are similar to banks in many ways which is why we needed to meet with him this date, to ask him questions.

[Redacted - Patron] asked how long he would be on the "blacklist" for [Redacted - Patron] noted that players are referring to sourced conditions as the "blacklist"). He was informed that if there are any changes he would be notified in the next week or two. He informed investigators he would be returning to China next month (in June).

[Redacted - Patron] stated he had slightly more than \$30K in RRCR chips. He had just over \$20K on him at the time of the interview and another approx. \$10K at home.

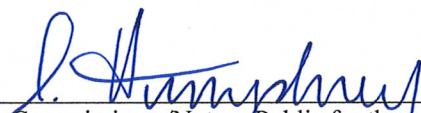
[Redacted - Patron] was told that if the casino can source the chips to him he would be able to use them but moving forward he would need to use his PGF account or cash must be accompanied with a receipt.

[Redacted - Patron] has not provided enough proof for investigators to feel comfortable with his source of funds as such it is recommended he remain on full conditions.

Steve Beeksmā
BCLC
AML Investigations

THIS IS **EXHIBIT "BB"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC IS Redacted - Patron Interview Identifying Information

Type of Interview: Non Script, Instructions below.

Interview Date: 2017-JUNE-01

Interview Time: 1100hrs

Interview Location: RRCR (private room 13/14)

BCLC Investigators: Stone LEE, Steve BEEKSMA, Lynn COUSINS

Contact Approach: Patron to be advised a number of patrons are being spoken to about their current transactions in BCLC Casinos.

Patron details:

Redacted - Patron
Interview Identifying
Information

Language:

Mandarin

Conditions:

Redacted - Patron Interview Identifying Information's play is currently suspended pending interview with BCLC as a result of concerns regarding information contained within Redacted - Patron's OSINT report.

Recent Activity:

On 2017-MAY-19 Redacted - Patron's play was suspended as a result of OSINT report info with the following comment added to his SID profile:

2017-May-19 ***BCLC DIRECTIVE*** Effective immediately patron is suspended from all gaming pending an interview with BCLC AML unit. Please advise patron to contact Consumer Services at 1-866-815-0222 or via email through BCLC.com and provide contact details for BCLC Investigations to schedule an interview. Daryl Tottenham, Manager BCLC AML Programs

The focus of the interview will be establishing SOF and SOW along with enhanced CDD/KYC and establishing Redacted - Patron's relationship/dealings with Redacted - Patron Interview Identifying Information

Redacted - Patron Interview Identifying Information

History:

Redacted - Patron has generated 141 individual LCT records dating back to 2010-JUN.
Total buy ins to date: \$2.6 mil
Total disbursements to date: \$1.8
Negative \$800K all time

Redacted - FINTRAC

Incident summaries Redacted - FINTRAC :

Redacted - Patron Interview bought in for Redacted (all \$20 bills). The investigator that reviewed the incident noted the money was carried into the casino by Redacted inside a brown paper bag. The investigator also notes the cash was presented in bundles bound by both elastic bands and paper straps (consistent with money from a FI). Redacted (driving a Redacted - Patron Interview Identifying Information arrived at the casino in the company of an Redacted identified as Redacted - Patron Interview Identifying Information.

Redacted - Patron Interview Identifying Information This incident is a site ban file that details an Redacted identified as Redacted - Patron Interview Identifying Information trying to collect "money owed to her" from Redacted - Patron Interview Identifying Information Casino surveillance reported that Redacted lost all but Redacted then Redacted confronted him to pay her back monies owed. When questioned, Redacted informed staff that Redacted.

On Redacted (same file) Redacted received a phone call from a male identifying himself as Redacted (no casino profile) indicating he was calling on behalf of Redacted and informing the casino Redacted.

Redacted - Patron bought in for \$40,000 (all \$20's). He arrived at the casino alone and gambled without irregularity noted by the casino. Tracking documents suggest he was about even at the end of play but did not redeem his chips. This is the last documented transaction in any BC Casino attached to Redacted - Patron Interview's profile.

BCLC OSINT report:

On 2017-MAY-19 BCLC AML Analysts completed an OSINT report on patron Redacted - Patron Interview Identifying Information at the request of BCLC AML Project Manager Daryl TOTTENHAM due to a sudden increase in play level.



OSINT report also showed [Redacted - Patron Interview] as the Director for a company named [Redacted - Patron Interview Identifying Information] and another company named: [Redacted - Patron Interview Identifying Information]

Occupation:

[Redacted - Patron Interview Identifying Information]

Company:

Company name not clear (to be determined)

Specific Questions to Ask:

1. Confirm his address at [Redacted - Patron Interview Identifying Information] is current.
2. What is the source of his wealth?
3. Confirm his occupation/source of income including how long he has been working there and where the business is located and what [Redacted - Patron Interview] role or job title is (if applicable).
4. Educate him with respect to fact that his activities specific to the large volumes of unsourced funds is BCLC's primary concern.
5. Impress upon the patron that money in small denominations is consistent with being related to criminal activity.
 - a. Where does the cash come from?
 - b. How does he make arrangements to get it?
6. Encourage [Redacted - Patron Interview] to use his PGF account. Review of [Redacted - Patron Interview] recent LCT activity confirms he holds PGF account [Redacted - Patron Interview] at HRVC.
7. Caution [Redacted - Patron Interview] against using associates to conduct transactions for him. Should this behaviour continue BCLC might put further restrictions on his ability to buy in at BC Casinos.
8. Has he heard about any underground casinos and if so, where?

RE [REDACTED]

1. Describe his relationship with the female [REDACTED - Patron Interview Identifying Information]
 - a. How did they meet?
2. Where did the [REDACTED] in \$20 bills come from?
4. Is the issue with [REDACTED] settled?

RE [REDACTED]

1. Where did the \$40,000 in \$20 bills come from?
 - a. What did he do with the chips? (Tracking suggests he was about even when he left and did not receive a disbursement.

RE OSINT related questions (explain to [REDACTED - Patron Interview] BCLC's requirement RE CDD/KYC):

1. Does [REDACTED - Patron Interview Identifying Information] have any open cases before the courts?
2. Ask [REDACTED - Patron Interview Identifying Information] to describe his relationship with [REDACTED]
 - a. How did they meet?
 - b. What is his impression of [REDACTED] occupation?
 - c. Were the loans personal loans between himself and [REDACTED] or was there a business involved.
 - d. What did he borrow the money for?
 - e. Has he paid any of it back [REDACTED]?
 - f. Was he ever fearful dealing with [REDACTED]?
 - g. Were there ever any threats (implied or direct) made toward him by [REDACTED] or individuals he believes were acting at the direction of [REDACTED]?
3. Confirm [REDACTED - Patron Interview] companies as detailed above and their current state (do they still exist?).

BCLC Conditions: To be determined post interview.

Interview Results:

Introductions were made and [REDACTED - Patron Interview] was educated on BCLC's role in BC Casinos and advised that BCLC is required to conduct enhanced due diligence on some of their players.

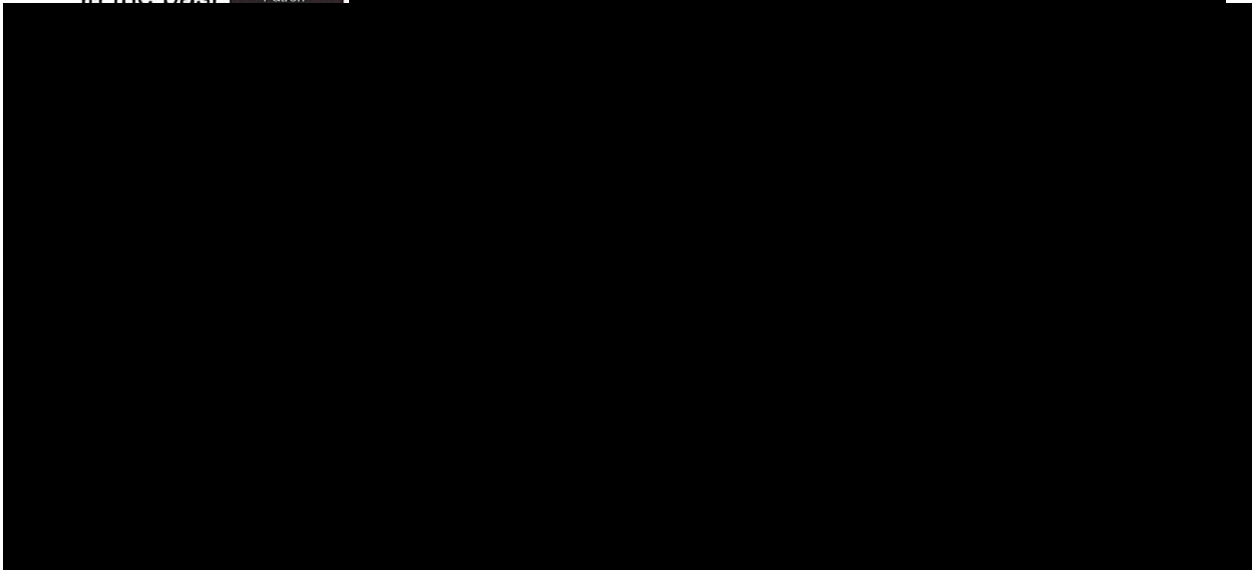
- [REDACTED - Patron Interview] advised that he sold the house in [REDACTED - Patron Interview Identifying Information] and is presently renting a home in [REDACTED - Patron Interview Identifying Information].
- [REDACTED]
- In recent years he has spent more of his time in Canada than China.
- [REDACTED - Patron Interview] advised that he owns a [REDACTED]
- [REDACTED] that [REDACTED - Patron Interview Identifying Information]
 - He provided the name [REDACTED - Patron Interview] for his [REDACTED] (no clear iTrak matches).
 - He described this company as [REDACTED - Patron Interview Identifying Information].
 - It is based out of the [REDACTED - Patron Interview] area.

Redacted - Patron Interview Identifying Information

- Redacted - Patron advised most of the money he uses in the casino comes from either his numerous "Union Pay" cards, from a money exchange business or from individuals advertising on classified ads with offers to exchange foreign currency.
 - At this point in the interview Redacted - Patron started removing multiple "Union Pay" cards from his wallet (4 total, the impression was he had more). He advised that he can get up to \$2,000 (CDN) per day per card from nearly any major banks ATM (he named Scotia, BMO and CIBC in English).
 - He typically uses these cards when he needs money and the banks are closed.
- RE: Money Exchanges:
 - Redacted - Patron Interview stated he uses the one located in [REDACTED] most often.
 - He has used ones in Richmond but doesn't like them because they charge more money on the exchange than the one in [REDACTED]
 - Redacted - Patron Interview usually exchanges large amounts at a time so a slight difference in exchange equates to a lot of money.
 - He mentioned the one in Richmond he'd used in the past was near [REDACTED] and the name roughly translates into English as [REDACTED]
 - Redacted - Patron stated in all of his years using exchange places he can only recall one instance when he received large bills. He nearly always receives small bills from MSB's.
 - Redacted - Patron stated he never gets receipts from the exchange businesses, he doesn't ask for them and he is never offered one.
 - How it works is he transfers money from his Chinese account to a Chinese account provided by the exchange place. Once the money clears he receives the CDN equivalent in cash.
 - Redacted - Patron Interview advised that he often searches the classifieds section on a website named "VANPEOPLE.COM". He brought up the website on his smart phone and showed investigators lists of ads offering to exchange currency.
 - It was noted that only the top 3 ads were from businesses and the rest were individuals (investigators recognized Kinbok was the second one down).
 - Redacted - Patron Interview stated an individual will always give you a better rate than a business that has overhead and other costs related to running a business.
 - Redacted - Patron Interview was asked if he feels safe meeting with strangers to exchange large amounts of funds.
 - He was OK with this adding he only meets in public places and the transfer (China to China account) is done face to face using smart phones. Once cleared the CDN is turned over.
- Redacted - Patron Interview showed investigators his Chinese bank account activity on his smart phone to help convince investigators of his source is wealth. Numerous significant deposits (\$10,000 to \$100,000 RB) were noted with withdrawals in between. Under each transaction was the running balance which often totaled in excess of \$250,000 RB.

RE [REDACTED]

- [Redacted - Patron Interview Identifying] stated that he knows the female involved in this incident [Redacted - Patron Interview Identifying] as the owner of a [Redacted - Patron Interview Identifying Information] that he had gone to in the past [Redacted - Patron Interview Identifying Information]



- [Redacted - Patron Interview Identifying] has not seen or had contact with [Redacted - Patron Interview Identifying] since the incident date.

RE [Redacted - Patron Interview Identifying]

- The money he brought into EDGE this date was a combination of money he withdrew via his Union Pay cards and money received from a MBS.

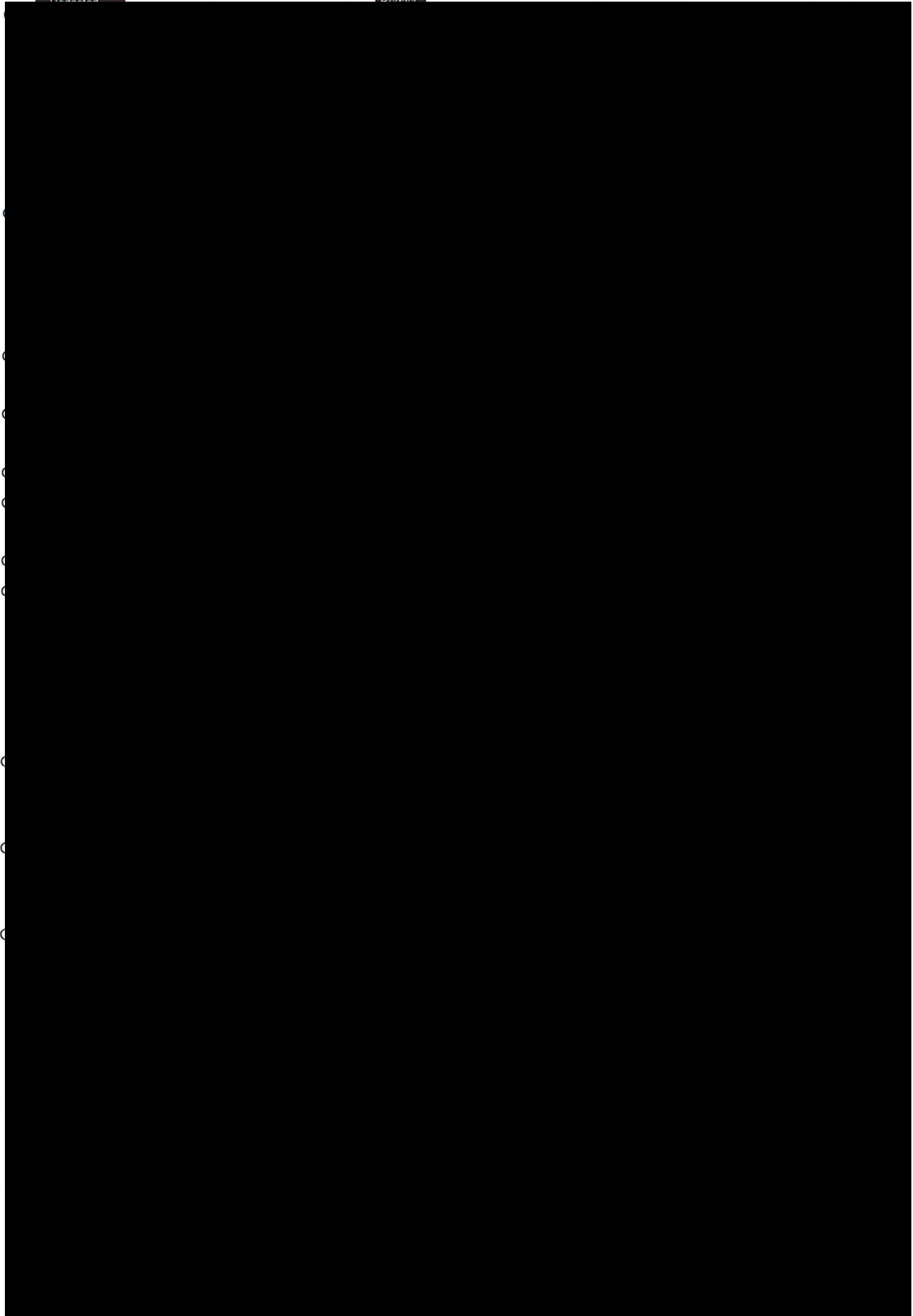
RE OSINT related questions:

- [Redacted - Patron Interview Identifying] was asked if he has had any legal issues that were before the courts. The impression was that [Redacted - Patron Interview Identifying] was very honest and forthcoming with his answers to the questions that followed. [Redacted - Patron Interview Identifying] was not lead or coerced into any of the answers given.



- [Redacted - Patron Interview Identifying Information] was asked if he knew his name and [Redacted - Patron Interview Identifying] called him (sounds like) [Redacted - Patron Interview Identifying] which investigator LEE translated to "last or surname: [Redacted - Patron Interview Identifying]".

- [Redacted - Patron] did not know [Redacted] well. He had seen him in the casino several years ago, socializing with friends/associates.





Interpreter required: Yes, Investigator Stone LEE translating with BEEKSMA and COUSINS taking notes.

BCLC Conditions: [Redacted - Patron] was informed that he would be updated on his status with BC Casinos and that he would be unable to gamble until such time.

Investigator Comments:

The general impression left with investigators was that [Redacted - Patron Interview] was very open and honest throughout the interview. He provided significant intel on the inner workings of how wealthy Chinese convert their Chinese currency to Canadian.

[Redacted - Patron] did not hesitate to discuss [Redacted] with [Redacted - Patron] either.

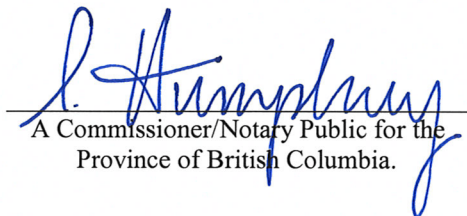
His dealings with [Redacted] seemed to be a one-off occurrence and it is very unlikely he would repeat this behavior.

[Redacted - Patron Interview] satisfied investigators need to source his wealth which included providing details of his businesses, showing numerous Chinese credit cards that allow him to access CDN funds via ATM, allowing investigators to review his Chinese bank account activity summary on his mobile device and detailing how MSB's work (which is consistent with information learned in other recent interviews).

A copy of this interview summary has been provided to BCLC Manager of AML Projects Daryl TOTTENHAM for review.

Steve Beeksma
BCLC
AML Investigations

THIS IS **EXHIBIT "CC"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

BCLC DIRECTIVE

SOURCE OF FUNDS DECLARATION

Effective Date: January 10, 2018



Effective January 10th, 2018 all cash and bearer monetary instruments (bank drafts/ certified cheques) of \$10,000 or more will require a source of funds (SOF) receipt by the patron prior to acceptance for buy-in at all BCLC Gaming Service Provider locations. This receipt will be documented on a revised Reasonable Measures (RM) form and shall be scanned into iTrak for all LCT entries.

This change follows an interim report to the Attorney General's office from the Peter German review currently underway. We currently have a source of funds process for patrons flagged in iTrak by the AML Unit however, this new process will apply to ALL cash and bank draft/ certified cheque buy-ins for \$10,000 or more. This also includes incremental table buy-ins when they reach the \$10,000 threshold. The reported amount for incremental buy-ins must be reported in full once the amount reaches \$10,000. The cash receipt will be required before the patron is allowed to buy-in and will be reviewed daily by the AML Unit.

The required receipt must be an original which aligns with the amount and denominations expected for the buy-in. The receipt shall be retained by the Service Provider and scanned into the associated iTrak LCT entry for the patron. If the receipt is not from the same day of use, further inquiries need to be made to confirm it is legitimate. An example of this might include cash withdrawn prior to a long weekend by a patron, however, a receipt that is two weeks old would not be reasonable. If Service Provider staff find the circumstances suspicious in any way the buy-in must be refused and documented as an Unusual Financial Transaction incident in iTrak.

The Reasonable Measures form has been updated and now contains both the RM questions and the SOF Declaration on one form. Effective January 10th, 2018 when a patron attempts to buy-in with \$10,000 or more, they shall be advised of the new SOF process and that a receipt is now required for the cash. **A notation must be made on their iTrak subject profile in the comments field that indicates they have now been advised of the new SOF program.** On all subsequent cash buy-ins of \$10,000 or more where the patron does not provide a receipt, an iTrak file must be created for a "refused SOF request" for investigation by the AML Unit.

Where a player is buying-in with cash that was paid out to the player by a casino for casino winnings, the Gaming Service Provider must confirm the player was paid out an amount that is consistent with the buy-in amount and the date of the prior cash-outs. This would include contacting the casino that paid out the disbursement in order to confirm the amount, date and denominations. If you are unable to obtain the required information from the casino that paid the patron out, you should contact BCLC for confirmation. In these circumstances, "pay out from casino" shall be indicated in the account number field of the RM/SOF Form including the casino name and the amount received by the patron.

74 West Seymour Street
Kamloops, BC V2C 1E2

T 250.828.5500
F 250.828.5831

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.225.6424
bclc.com

Once completed, the employee documenting the information shall print and sign their name at the bottom of the RM/SOF form, along with their GPEB number and the date. The employee signing the form is certifying that the information is complete and accurate.

This RM/SOF form must also be signed by the patron for cash buy-ins of \$10,000 or more, including incremental buy-ins at the tables. The transaction that triggers the \$10,000 threshold shall not be completed until the RM/SOF form is completed and signed by the patron.

Please ensure a copy of the completed form is scanned into the media file of the iTrak LCT report and that it is legible.

The next release of BCLC Casino Policies and Procedures will incorporate these changes and replace this directive.

If you have any questions regarding this directive, please contact the AML Unit at [REDACTED]

Sincerely,



Daryl Tottenham
AML, Programs Manager



74 West Seymour Street
Kamloops, BC V2C 1E2

T 250.828.5500

F 250.828.5631

2940 Virtual Way
Vancouver, BC V5M 0A6

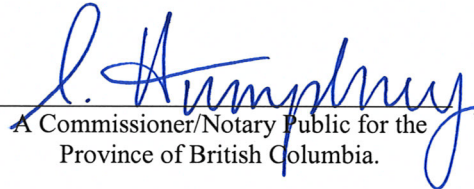
T 604.215.0649

F 604.225.6424

bclc.com

THIS IS **EXHIBIT "DD"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20180029122

Record Creation Details	
Date/Time Occurred:	5/10/2018 2:42 PM
Day of Week Occurred:	Thursday
Date/Time Created:	5/10/2018 3:23 PM
Date/Time Closed:	
Closed By:	
Department:	Surveillance
Owner:	Irezek
Operator ID:	Irezek
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

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

Details of Incident:

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

Redacted - FINTRAC

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

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029122

Participants Involved:

Personnel

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

Subject

Full Name: [REDACTED] Company: Jie Shi Garment Co. Ltd.
 Role: Patron

Full Name: [REDACTED] Company: Da Chong Nan Min Furniture LTD.
 Role: Patron

Full Name: [REDACTED] Company: 1032682 BC Ltd
 Role: Patron

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
[REDACTED]	Watch	12/ 5/2018	Permanent

Type Of Ban:

Notes:

Reason For Ban:

Identification:

Supplemental Entries:

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

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

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

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

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029122

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

SP2018008089

2 - Continued-

Form 86 sent.

Footage M/MAY/SFT/18-29122

L WAN

25549

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

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:08 AM

Page 3 / 6

BCLC0015875.03

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

SP2018008316

7 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:08 AM

Page 4 / 6

BCLC0015875.04

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

SP2018008316

7 - Continued-



Redacted
- FINTRAC

S.BEEKSMA

BCLC - AML Investigations

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:08 AM

Page 5 / 6

BCLC0015875.05

List of Attached Forms:

Prefix

Form Name

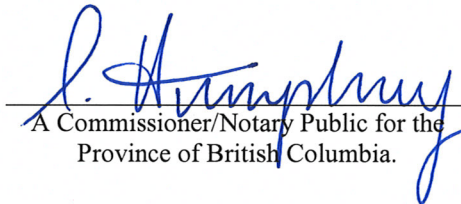
A

Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "EE"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20180030356

Record Creation Details	
Date/Time Occurred:	5/15/2018 8:45 PM
Day of Week Occurred:	Tuesday
Date/Time Created:	5/16/2018 10:52 AM
Date/Time Closed:	
Closed By:	
Department:	Gaming Operations
Owner:	alaw
Operator ID:	malianza
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

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

Details of Incident:

Daily Log #:	DL20180457850
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Redacted - FINTRAC
Incident Status:	Closed
Synopsis:	SID #183041 BUY-IN \$9.9K (all \$20's) MDB 1 CD 10 cash counter C/S Eva @ RRWS-10 M-02 Cage advised to validate ID on i-Trak file
Checklist:	- Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
5/16/2018 10:53 AM	malianza		
SID #183041 BUY-IN \$9.9K (all \$20's) MDB 1 CD 10 cash counter C/S Eva @ RRWS-10 M-02 Cage advised to validate ID on i-Trak file			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180030356

Participants Involved:

Personnel

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

Subject

Full Name:	[REDACTED]	Company:	Ronghan Realtor Production
Role:	Patron		Company

Supplemental Entries:

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

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

Although [REDACTED] appeared to be gaming with no irregularities noted, the following could be considered unusual with this transaction.

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

Footage shows the following:

At 20:28 [REDACTED] is dropped off by an unknown Lexus SUV (unknown driver and license plate).
 At 20:32 [REDACTED] presents a bundle of C\$20 at CD10 for cage buy-in. [REDACTED] removes approximately 5xC\$20 from his bundle. Cage completes the count for a total of C\$9,900 (495xC\$20).
 At 20:53 [REDACTED] receives chips at MDB01.
 At 20:55 [REDACTED] moves to Maple Leaf and Dogwood and begins place wagers as a back-bettor.

Images attached to media.

Footage MAY18\UFT\18-30356

MLIANZA

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180030356

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

SP2018008414

8 - Continued-

30068

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

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/1/2020 8:11 AM

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BCLC0015881.03

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

SP2018008476

0 - Continued-



Redacted
- FINTRAC

S.BEEKSMA

BCLC – AML Investigations

Reporting Party:

Supervisor:

Printed: 10/ 1/2020 8:11 AM

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BCLC0015881.04

List of Attached Forms:

Prefix

Form Name

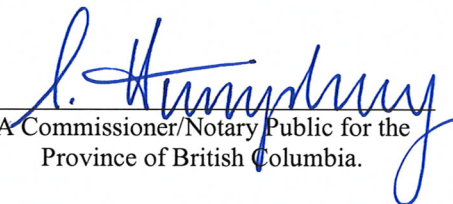
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Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "FF"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20190044132

Date/Time Occurred:		Record Creation Details	
	Redacted - RCMP	Department:	Surveillance
Day of Week Occurred:		Owner:	aorlov
Date/Time Created:	3:54 AM	Operator ID:	aorlov
Date/Time Closed:	12:03 PM	Operator Name:	
Closed By:	jklam	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: Parq Casino

Location: Casino level 3

Sublocation: MDB 813

Details of Incident:

Daily Log #: DL20190600164

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Closing Remarks: Refer to IN20190044265

Synopsis: Small denomination buy-in conducted between 3 patrons on MDB813

Checklist: - Section 86 Form

Narrative:

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

Redacted - RCMP	3:54 AM	aorlov
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Small denomination buy-in conducted between 3 patrons on MDB813

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20190044132

Participants Involved:

Personnel

Full Name:	ORLOV, Alex (Alexei)	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	LAM, Jenny	Property:	Parq Casino
Role:	Documenter	Department:	BCLC

Subject

Full Name:	LNU, PARQ19-44132	Company:	
Role:	Patron		
Full Name:	LNU, PARQ19-44119	Company:	
Role:	Patron		
Full Name:	Redacted - RCMP	Company:	Redacted - RCMP
Role:	Patron		

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
LNU, PARQ19-44132	Ban	Redacted - RCMP	Permanent
Type Of Ban:	BCLC Prohibition	Notes:	
Reason For Ban:			
Identification:	None		
LNU, PARQ19-44119	Ban	Redacted - RCMP	Permanent
Type Of Ban:	BCLC Prohibition	Notes:	
Reason For Ban:			
Identification:	None		

Supplemental Entries:

SP20190117655 Attached by aorlov on Redacted - RCMP 03:57

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

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

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

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20190044132

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

SP2019011765

5 - Continued-

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

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

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

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

Relevant footage saved under "UFT"

Section 86 sent

Alex ORLOV

83205

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

Description Footage transfered to BCLC Share Drive

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

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

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

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

S.BEEKSMA

BCLC

AML Project Specialist

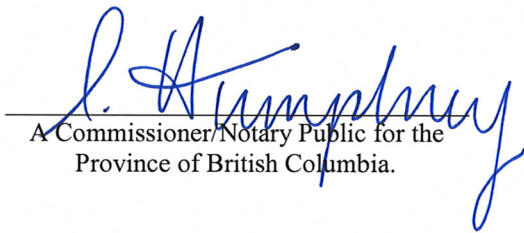
Reporting Party:

Supervisor:

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "GG"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ^{21st}_{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200006109

Record Creation Details	
Date/Time Occurred:	1/27/2020 11:51 PM
Day of Week Occurred:	Monday
Date/Time Created:	1/28/2020 9:56 AM
Date/Time Closed:	1/31/2020 2:58 PM
Closed By:	glau
Department:	Surveillance
Owner:	malianza
Operator ID:	malianza
Operator Name:	
Personnel ID:	
Card Number:	
Job Position:	
Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 07

Details of Incident:

Daily Log #: DL20200081992
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: SID 87711 [REDACTED] B/I \$9K (50s) at MDB 7 as per DS Elaine
 Checklist: - Section 86 Form
 Narrative:

Created On	Created By	Modified On	Modified By
1/28/2020 9:56 AM	malianza		
SID 87711 [REDACTED] B/I \$9K (50s) at MDB 7 as per DS Elaine			

Executive Brief:

Participants Involved:

Subject

Full Name:	[REDACTED]	Company: CEO - Fuan Mining Company
Role:	Patron	

Full Name:	[REDACTED]	Company:
Role:	Patron	

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

Supplemental Entries:

SP20200014846 Attached by malianza on Jan 28, 2020 09:57

Description

Surveillance noticed a large buy-in for:

[REDACTED] (SID 87711) who has a listed occupation as "housewife" and address of [REDACTED]

[REDACTED] and her associate,

[REDACTED] (SID 73504) who has a listed occupation as "Owner Trading Business of Raw Materials" and address [REDACTED]

Although [REDACTED] has limited FINTRAC level gaming history at BC-RRCR Casino and [REDACTED] appears to be a seasonal player, there are some areas of this transaction that could be considered unusual.

1. [REDACTED]'s occupation does not readily aid in sourcing her level of wealth. 3.1.16 Client's occupation does not match the level or type of play with no known explanation for the difference
2. [REDACTED] has one associate; however, their although there relationship is unknown.
3. [REDACTED] and [REDACTED] remove some bills from their buy-in, which allows the individual buy-in totals to fall below FINTRAC-LCT reportable threshold and BCLC SOF requirements. 3.1.24 Client appears to be structuring amounts to avoid record keeping, client identification or reporting thresholds. 3.1.25 Client appears to be collaborating with others to avoid record keeping, client identification or reporting thresholds
4. [REDACTED] used a bundle of bills that were bound with elastic bands that did not originate from a recognized financial institution, such as a bank, atm, global cash&win and the transaction occurred outside usual banking hours. 3.1.11 Client has access to large amounts of cash after banking hours on short notice
5. It would be considered unusual for a BC Casino to issue a large casino disbursement using \$50 denominational bills.
6. [REDACTED] and [REDACTED] buy-in are suspected of originating from the same source and will be documented in this report. The combined total will exceed FINTRAC-LCT reportable threshold and BCLC reporting requirements.
7. [REDACTED]'s occupation could aid in sourcing a level of wealth; however, the occupation could be considered vague. 3.1.26 Client provides doubtful or vague information
8. Although [REDACTED] has been involved in previous UFT reports, most recently, IN20190064704 unsubstantiated report, could demonstrate the [REDACTED] is a seasonal player.
9. [REDACTED] has one associate who has recently received a BCLC Prohibition (SID 51134). 3.1.4 Client has known associates who are deemed suspicious by the gaming facilities

Footage shows the following with times approximate:

At 23:33 [REDACTED] arrives on site with [REDACTED] (SID 73504) in a Porsche Cayenne (l/p GM827J) south parkade.

[REDACTED] enters salon and [REDACTED] enters casino east entrance on her phone, continues to MapleLeaf and then to Dogwood Baccarat Room on her phone.

At 23:44 [REDACTED] removes some \$50 denominational bills from the bundle and places the bundle of \$50 bound with elastic bands at MDB27 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). [REDACTED] receives chips and begins to game.

At 23:41 [REDACTED] on her phone at the back wall before removing some \$50s from her bundle and places the bundle bound with elastics for table buy-in. DLR completes the count for a total of \$9K (180x\$50).

After receiving chips, [REDACTED] accesses her phone at 23:58 in Dogwood Baccarat Room and again at 00:03 outside Maple Leaf Baccarat Room. [REDACTED] has not participated in gaming activity.

At 00:29 [REDACTED] enters salon and begins gaming alongside [REDACTED] at MDB27, albeit with \$100

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

SP20200014846 Attached by malianza on Jan 28, 2020 09:57

SP2020001484

6 - Continued-

denominational chips.

At 01:00 [REDACTED] removes high value chips (\$500 and \$1000) from her pocket and chip changes 6x\$500 and receives 3x\$1K chips. [REDACTED] also passes some \$1K chips to [REDACTED] [REDACTED] places these \$1K chips into her pocket.

At 04:55 [REDACTED] chips changes 45x\$1K and receives 9x\$5K chips.

At 05:05 [REDACTED] cashes out 8x\$5K chips at CD19 and receives 400x\$100 bills. [REDACTED] does not cash out and is on her phone during [REDACTED] casino disbursement.

Total buy-in of \$18.9K using 378xC\$50 denominational bills.

[REDACTED] is the driver of the Porsche.

Footage JAN20\UFT\20-06109

MLIANZA

30068

SP20200016717 Attached by glau on Jan 31, 2020 14:57

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Refused SOF Request.

2020-JAN-27

Patrons [REDACTED] (f) SID #887711 and [REDACTED] (m) SID # 73504 arrived together at the Riverrock casino. [REDACTED] and [REDACTED] started off gaming separately and eventually gamed to the same Bacarrat table. [REDACTED] bought in for \$9,900 (198x\$50) to start his gaming at MDB27. [REDACTED] bought in for \$9,000 (180x\$50) at MDB7. [REDACTED] buys in but leaves the table without gaming.

[REDACTED] eventually meets up with [REDACTED] at MDB27 and started gaming. [REDACTED] eventually cashes out for \$45,000 and leave the casino with [REDACTED]. [REDACTED] did not cash out her chips.

SURVEILLANCE:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006109

SP20200016717 Attached by glau on Jan 31, 2020 14:57

SP2020001671

7 - Continued-

2020-JAN-27/28

At 23:33 - [REDACTED] arrives on site with [REDACTED] (SID 73504) in a Porsche Cayenne (l/p GM827J) south parkade.

23:44 - [REDACTED] removes some \$50 denominational bills from the bundle and places the bundle of \$50 bound with elastic bands at MDB27 for table buy-in. DLR completes the count for a total of \$9.9K (198x\$50). [REDACTED] receives chips and begins to game.

23:41 - [REDACTED] on her phone at the back wall before removing some \$50s from her bundle and places the bundle bound with elastics for table buy-in. DLR completes the count for a total of \$9K (180x\$50).

After receiving chips, [REDACTED] accesses her phone at 23:58 in Dogwood Baccarat Room and again at 00:03 outside Maple Leaf Baccarat Room. [REDACTED] has not participated in gaming activity.

At 00:29 - [REDACTED] enters salon and begins gaming alongside [REDACTED] at MDB27, albeit with \$100 denominational chips.

At 01:00 - [REDACTED] removes high value chips (\$500 and \$1000) from her pocket and chip changes 6x\$500 and receives 3x\$1K chips. [REDACTED] also passes some \$1K chips to [REDACTED] [REDACTED] places these \$1K chips into her pocket.

At 04:55 - [REDACTED] chips changes 45x\$1K and receives 9x\$5K chips.

At 05:05 - [REDACTED] cashes out 8x\$5K chips at CD19 and receives 400x\$100 bills. [REDACTED] does not cash out and is on her phone during [REDACTED] casino disbursement.

CONCLUSION:

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

In this case patron identified as [REDACTED] (SID#73504) had bought-in for \$9,900 in \$50 bills which is under the \$10,000 threshold with-in the 24 hrs therefor patron was not approached for receipt. Patron [REDACTED] also had bought-in for \$9,000 in \$50 bills which is under the \$10,000 threshold with-in the 24 hrs therefor patron was not approached for receipt also. The total buy in for both [REDACTED] and [REDACTED] were \$18.9K using 378xC\$50 denominational bills.

There were no irregularities detected in either [REDACTED] or [REDACTED]s play in the casino.

Although [REDACTED] and [REDACTED] was able to buy-in for \$9,900 and \$9,000 and was not approached for provide receipts, it does not make the cash they used or these circumstances suspicious.

A review of [REDACTED]s subject profile was done. [REDACTED] has no substantiated UFT on file. [REDACTED] have been generating LCTR since Nov/2009 with past buy-in ranging from \$8500 to \$230,000 per gaming session.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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BCLC0016421.04

Incident File Full Report

Incident File #IN20200006109

SP20200016717 Attached by glau on Jan 31, 2020 14:57

SP2020001671

7 - Continued-

A review of [REDACTED]'s subject profile was done. [REDACTED] has 2 incidents on iTRAK. One incident 2019-7549 shows [REDACTED] passing chips to [REDACTED] [REDACTED] also have 2 LCTs.

[REDACTED]'s occupation does not readily aid in sourcing her level of wealth. [REDACTED] stated that she is a housewife. Due to the lack of history in BC casinos for [REDACTED], the writer is unable to link any suspicious funds to her.

As for [REDACTED] his stated occupation as an owner of a raw material trading company could reasonable explain his SOF/SOW.

There is no information to indicate that [REDACTED] or [REDACTED]'s funds were likely sourced from the proceeds of crime or that their activities at the Riverrock Casino on 2020-JAN-27/28 was anything other than an attempt at legitimate gambling.

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

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

Gerald Lau

BCLC AML Investigations

SP20200018308 Attached by sbEEKSMA on Feb 3, 2020 06:29

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

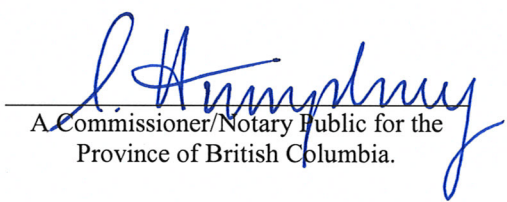
Supervisor:

Printed: 10/7/2020 2:37 PM

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BCLC0016421.05

THIS IS **EXHIBIT "HH"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ^{21st}~~21st~~^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200006138

Incident Details		Record Creation Details	
Date/Time Occurred:	1/24/2020 12:17 AM	Department:	Surveillance
Day of Week Occurred:	Friday	Owner:	malianza
Date/Time Created:	1/28/2020 12:48 PM	Operator ID:	malianza
Date/Time Closed:	1/31/2020 2:53 PM	Operator Name:	
Closed By:	glau	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	MDB 03

Details of Incident:

Daily Log #:	DL20200069521			
Type:	Gaming			
Specific:	Unusual Financial Transaction			
Category:	Unsubstantiated			
Incident Status:	Closed			
Synopsis:	[REDACTED] (no SID) \$7k cash BI (100x\$20s 100x\$50s) D/S John c1141			
Checklist:	- Section 86 Form			
Narrative:	Created On	Created By	Modified On	Modified By
	1/28/2020 12:48 PM	malianza		
	[REDACTED] (no SID) \$7k cash BI (100x\$20s 100x\$50s) D/S John			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC
Full Name:	GAJIC, Velibor	Property:	River Rock (GCC)
Role:	Notified	Department:	Tables
Full Name:	SUE, Randy	Property:	River Rock (GCC)
Role:	Other	Department:	Operations
Full Name:	LU, Hou (Michael) Cai	Property:	River Rock (GCC)
Role:	Other	Department:	Tables

Subject

Full Name:	[REDACTED]	Company:	JIN XIN Construction Company
Role:	Patron		

Supplemental Entries:

SP20200014898 Attached by malianza on Jan 28, 2020 12:49

Description Surveillance noticed buy-ins associated with an unknown male individual which falls below FINTRAC-LCT reportable threshold and BCLC SOF requirements. Although this individual may have an occupation that could aid in sourcing his wealth, there are some areas of this transaction that could be considered unusual.

(1) Buy-ins fall below and outside reportable thresholds (2) Patron is picked up and dropped off by various vehicles at different times of the day (3) Transactions fall outside usual banking hours (4) Patron does not cash out chips (5) Individual and associates are unknown (6) SOF and SOW is yet to be confirmed.

Patron name: [REDACTED] (no known subject ID)
 Patron Encore Card Acct: 2798387 - WuLuMUQi BC CAN
 Associates: 2 x UNAF - UNAF1 (possibly wife) and UNAF2 (possibly daughter).

2020 JAN 21 - DL20200060560 @ 00:27 total buy-ins reach \$9.8K in mixed bills (\$100s and \$50s).

Available footage shows the following with times approximate: Jan 20 @ 23:45 [REDACTED] receives chips from his \$3K (30x\$100) MDB08 table buy-in and continues to game. Jan 21 @ 00:25 VIP Host SUE speaks with [REDACTED] who counts \$50 denominational bills, removes some from his bundle, and places \$50s for table buy-in. Count completed for \$1.8K (36x\$50) [REDACTED] receives chips and continues to game. Jan 21 @ 01:02 [REDACTED] and associates enter an awaiting Mercedes (l/p unavailable) outside west entrance and driven off site via No3 Rd. Driver appears to be an UNAF.

2020 JAN 22 - DL20200064754 @ 12:30 total buy-ins reach \$9.8K in mixed bills (\$100s, \$50s and \$20s).

Available footage shows the following with times approximate: Jan 22 @ 12:05 [REDACTED] and

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

SP20200014898 Attached by malianza on Jan 28, 2020 12:49

SP2020001489

8 - Continued-

associates are dropped off by an unknown individual in Mercedes SUV (l/p not available). Driver appears to be an UNAM.

At 12:10 [REDACTED] counts \$100s and \$50s and UNAF1 passes bundle of \$20s (bills were bound elastics) to [REDACTED] [REDACTED] passes all currency to dealer for table buy-in at MDB05. DLR completes the count for a total of \$7K (100x\$20, 60x\$50, 20x\$100).

[REDACTED] receives chips and begins to game.

At 15:25 [REDACTED] and his associates are outside east entrance on their phone and appear to be waiting for someone.

From 15:33 to 15:51 UNAF2 makes several transactions at two ATM machines with [REDACTED] and UNAF1 nearby. All three individuals periodically view their cellphones during the transactions. After the transactions, UNAF1 passes all currency to [REDACTED]

At 16:10 [REDACTED] places \$3K (30x\$100) at MDB05 for table buy-in; however, DSV LU speaks with [REDACTED] and [REDACTED] removes 2x\$100 bills from the buy-in. DLR completes the count for a total of \$2.8K (28x\$100), with [REDACTED] receiving chips and begins game play.

At 16:42 Mercedes SUV (l/p JF807H) enters west parkade and parks in a location that [REDACTED] and associates were last seen before a Mercedes SUV leaves site.

2020 JAN 24 - DL20200069521 - JAN 24 @ 00:17 total buy-ins reach \$7K in mixed bills (\$100s, and \$50s).

Available footage shows the following with times approximate: Jan 23 @ 23:50 Mercedes (l/p JF807H) enters west parkade and [REDACTED] exits driver side with UNAF2 as passenger. [REDACTED] places a losing \$500 chip wager on MDB05 and [REDACTED] and UNAF2 access their phones. Jan 24 @ 00:00 [REDACTED] counts mixed bills and places \$7K in mixed bills for table buy-in at MDB03, using \$50s and \$20s denominational bills which were separated by individual elastic bands. DLR removes elastic bands, and completes the count for \$7K (100x\$50 and 100x\$20). [REDACTED] receives chips and begins game play.

At 01:53 [REDACTED] chip changes 32x\$500 for 16x\$1K.

At 02:00 [REDACTED] exits casino west entrance with UNAF2 and drives UNAF2 off site in Mercedes SUV. [REDACTED] does not cash out chips.

2020 JAN 27 - Review shows [REDACTED] on site at 10:45 dropped off outside west entrance by a (possible) Toyota sedan enter casino west entrance with UNAF1, sits at MDB05, removes chips from his pocket (\$1K chips value) and begins to game. During this gaming sessions [REDACTED] wins approximately \$25K in chips at MDB05. [REDACTED] leaves the table, counts his chips, puts them in his pocket (15:28) and does not cash out these chips before leaving site. [REDACTED] and his UNAF are picked up by an Honda sedan (l/p unavailable) outside west entrance at 15:45.

Images of individual [REDACTED] his two female associates and vehicles attached to media for reference.

Subject File-LNU opened for [REDACTED] and comment to attempt to identify [REDACTED] on his next visit.

Footage JAN20\UFT\20-06138

MLIANZA
30068

SP20200014923 Attached by malianza on Jan 28, 2020 14:11

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:37 PM

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BCLC0016422.03

Incident File Full Report

Incident File #IN20200006138

SP20200014923 Attached by malianza on Jan 28, 2020 14:11

SP2020001492

3 - Continued-

Description *Update 2020-JAN-28*

Surveillance noticed UNAM on site and requested TGM GAJIC to attempt to identify the individual in question. GAJIC approached and obtained necessary information.

Footage added to folder.

MLIAZNA

30068

SP20200016715 Attached by glau on Jan 31, 2020 14:53

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No direct involvement in substantiated UFT incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY: Incident noted, details reviewed.

RE: Buy In below reportable threshold

Name: [REDACTED]

BCID: CHN Passport # [REDACTED]

BCLC SID: 287786

DOB: [REDACTED]

Address: [REDACTED]

Home Phone Number: N/A

Occupation: N/A

Encore/ Gold Card: N/A

ITRACK profile (Started in 2020-JAN-28)) – 1 Incidents, 1 UFTs, 2 Media

LCT – None

SUMMARY:

New Patron [REDACTED] (SID # 287786) was gaming at the Riverrock Casino in Richmond, BC. [REDACTED] was at the casino on Jan 21, 22, 24 and 27 2020. [REDACTED] was observed by surveillance to

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

SP20200016715 Attached by glau on Jan 31, 2020 14:53

SP2020001671

5 - Continued-

be gaming at the Baccarat Tables. There was nothing unusual detected regarding [REDACTED]'s gaming. [REDACTED] was seen in the casino with an older female (LNU1) and a younger female (LNU2). Casino staff believed that LNU 1 might be [REDACTED]'s wife and LNU 2 might be [REDACTED]'s daughter.

[REDACTED] was observed buying in for \$9,800 on Jan 21, \$ 9,800 on Jan 22 and \$7,000 on Jan 24. All of [REDACTED]'s buy ins were mixed bills (\$100s, \$50s and \$20s).

On 2020-JAN-27, [REDACTED] wins \$25K in chips at MDB05 and left the casino without cashing out.

SURVEILLANCE:

2020-JAN-20

23:45 hrs - [REDACTED] receives chips from his \$3K (30x\$100) MDB08 table buy-in and continues to game.

2020-JAN-21

00:25 hrs - [REDACTED] buys in for \$1.8K (36x\$50)

00:27 hrs - total buy-ins reach \$9.8K in mixed bills (\$100s and \$50s).

2020-Jan-22

12:10 hrs - 7K buy in (100x\$20, 60x\$50, 20x\$100) at MDB05.

12:30 hrs - Total buy-ins reach \$9.8K in mixed bills (\$100s, \$50s and \$20s).

15:33 hrs - LNU 2 makes several transactions at two ATM machines with [REDACTED] and LNU 1 nearby. All three individuals periodically view their cellphones during the transactions. After the transactions, LNU 2 passes all currency to [REDACTED]

16:10 hrs - [REDACTED] buys in for \$2.8K (28x\$100).

2020-JAN-24

00:17 hrs - [REDACTED] buy-ins reach \$7K in mixed bills (\$100s, and \$50s).

2020-JAN-27

10:45 hrs - Arrived at Casino. Gamed until 15:45 hrs. [REDACTED] won \$25K and left the casino. [REDACTED] did not cash in his chips.

CONCLUSION/ACTIONS TAKEN

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006138

SP20200016715 Attached by glau on Jan 31, 2020 14:53

SP2020001671

5 - Continued-

The writer has reviewed the information provided by the casino and noted that [REDACTED] has no previous iTRAK history. [REDACTED] appears to be a new patron or possibly visiting the area with his family. [REDACTED] was seen in the casino with an older female LNU 1 (Possibly Wife) and a younger female LNU 2 (Possibly Daughter). Casino Surveillance observed LNU 2 obtaining cash from ATM to give to [REDACTED] for gaming purposes.

There was nothing unusual noted in [REDACTED]'s gaming. [REDACTED] risked appropriate amounts on each hand based on his gaming habits. There are no indications that the cash that [REDACTED] came with is related to any criminal activities. Because [REDACTED] has no history in BC casinos, it is impossible to link the cash that [REDACTED] had to any illegal activities.

Due to no iTRAK history, there is no information to indicate that [REDACTED]'s funds were likely sourced from the proceeds of crime or that his activity at The Riverrock Casino was anything other than an attempt at legitimate gambling.

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

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

Gerald Lau

BCLC AML Investigations

SP20200018310 Attached by sbEEKSMA on Feb 3, 2020 06:31

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

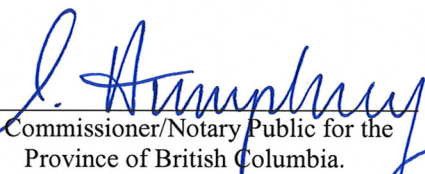
Supervisor:

Printed: 10/7/2020 2:37 PM

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BCLC0016422.06

THIS IS **EXHIBIT "II"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200006443

Date/Time Occurred: 1/29/2020 6:23 PM		Record Creation Details	
Day of Week Occurred: Wednesday		Department: Surveillance	
Date/Time Created: 1/29/2020 7:12 PM		Owner: jjnorman	
Date/Time Closed: 2/ 5/2020 9:28 AM		Operator ID: jjnorman	
Closed By: stolee		Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation: RYBX 03

Details of Incident:

Daily Log #: DL20200087098

Type: Gaming

Specific: Unusual Financial Transaction

Category: Unsubstantiated

Incident Status: Closed

Synopsis: UFT - SID 123838 [REDACTED] B/I \$4k (200 x \$20's) on RYBX03. WS10.
- C5077 at 17:46:40 drop off. (White lexus)

Checklist: At 19:53hrs; B/I \$2K (20's) on RYB07. Total B/I: \$6K. WS10. (jjn)
- Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/29/2020 7:12 PM	jjnorman		

UFT - SID 123838 [REDACTED] B/I \$4k (200 x \$20's) on RYBX03. WS10.
- C5077 at 17:46:40 drop off. (White lexus)

Executive Brief:

Participants Involved:

Subject

Full Name: [REDACTED] **Company:**

Role: Info From

Police Contacted: **Taken From Scene:** **Police Contacted Result :**

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006443

Supplemental Entries:

SP20200015669 Attached by malianza on Jan 29, 2020 19:14

Description Surveillance was advised of a large buy-in using \$20 denominational bills.
 Patron: [REDACTED] (SID 123838) - listed occupation "Owner Detail Business".
 No Incidents and No associates.
 International phone number and local address.

Although this amount is below FINTRAC-LCT reportable threshold and BCLC SOF requirements, there are some areas of this transaction that could be considered unusual.

1. It is unknown if [REDACTED]'s occupation deals primarily in small denominational bills but could be considered unusual.
2. Bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution, such as a bank, atm, or global cash&win.
3. It would be considered unusual and unlikely that a BC Casino would issue small denominational bills for large casino disbursements.
4. The bills were packaged in \$2K bundles - which has been an indicator that funds may be from questionable sources.
5. [REDACTED]'s occupation could be considered vague.

Footage shows the following with times approximate:

At 17:46 [REDACTED] is dropped off on property just off River Rd by a white SUV (possibly Lexus). Lexus does not enter valet nor does it come into clear camera view (GC way/River Rd). [REDACTED] is carrying an item as he enters resort doors and enters lobby washroom.

At 17:55 [REDACTED] enters casino east entrance accessing his phone as he walks westbound on the gaming floor.

At 17:57 [REDACTED] puts on a facemask (surgical mask), briefly enters washroom before beginning to write on a Baccarat tracking sheet at RYB01.

At 18:14 [REDACTED] removes two bundles of his pockets at RYBX03 and places them on the table for buy-in. DLR removes the elastic bands and begins the count.

At 18:25 DLR completes the count for a total of \$4K (200x\$20). [REDACTED] receives chips and walks around to various tables, marking numbers on the Baccarat tracking card. His gaming activity is limited, with bets ranging at ~\$20 wagers.

At 19:48 [REDACTED] removes a bundle of \$20s from his jacket pocket and places it on RYB01 for table buy-in. DLR removes the elastic band and completes the count for a total of \$2K (100x\$20). [REDACTED]

receives 2x\$1K chips and places the chips in his pocket. [REDACTED]

continues to remain at RYB01.

At 21:40 [REDACTED] accesses his phone and was last seen walking off site on No3 Rd.

Footage JAN20\UFT\20-06443

MLIANZA

30068

SP20200019222 Attached by stoele on Feb 4, 2020 12:26

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006443

SP20200019222 Attached by stolee on Feb 4, 2020 12:26

SP2020001922

2 - Continued-

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

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

On Feb/05/2020 writer reviewed this incident, surveillance footage shows that on the date of Jan/29/2020 at 1747:48 hrs patron identified as [REDACTED] (SID#123838) arrived alone at the hotel lobby, [REDACTED] appears to be on foot from Great Canadian Wa.

At 1814:33 hrs [REDACTED] was seen buying in on RYBX3 for \$4,000 in \$20 bills and begins to play on various tables.

At 1947:54 hrs [REDACTED] bought in for \$2,000 in \$20 bills on RYB7 and continues to play. (it is noted that patron was not approached as the buy-in amount is well under the SOF requirement.)

In this case [REDACTED] was able to buy-in for total of \$6,000 in \$20 bills which is well under the \$10,000 threshold therefore [REDACTED] was not approached for receipt.

A review of [REDACTED]s subject profile was done, [REDACTED] has no previous incident on file, [REDACTED] have been generating LCTR since Aug/2012.

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

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:38 PM

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BCLC0016423.03

Incident File Full Report

Incident File #IN20200006443

SP20200019222 Attached by stolee on Feb 4, 2020 12:26

SP2020001922

2 - Continued-

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

Stone LEE

BCLC Investigator

SP20200019725 Attached by sbeeksma on Feb 5, 2020 12:03

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045912 Attached by stolee on Jun 17, 2020 14:46

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

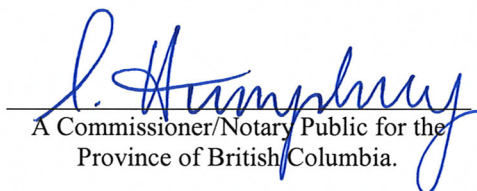
Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "JJ"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ~~21st~~^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200006510

Record Creation Details

Date/Time Occurred:	1/27/2020 9:47 PM	Department:	Surveillance
Day of Week Occurred:	Monday	Owner:	malianza
Date/Time Created:	1/30/2020 12:10 AM	Operator ID:	malianza
Date/Time Closed:	1/31/2020 2:48 PM	Operator Name:	
Closed By:	jklam	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation:

Details of Incident:

Daily Log #: DL20200081681

Type: Gaming

Specific: Unusual Financial Transaction

Category: Unsubstantiated

Incident Status: Closed

Closing Remarks: jl

Synopsis: SID 16422 BI \$8k (7.5k 20's - \$500 50's) on MDB25 (profile updated as per TGM Leon)

@2213 16422 cash b/i \$1.9k (50s) on MDB25 total accum \$9.9k - John

Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
1/30/2020 12:10 AM	malianza		

16422 BI \$9.9K (7.5K-20's - \$1.95K-50's) on MDB25 (profile updated as per TGM Leon)

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	[REDACTED]	Company:	Huang Ming Agriculture Co.
Role:	Patron		

Supplemental Entries:

SP20200015808 Attached by malianza on Jan 30, 2020 00:12

Description During a review, surveillance noticed the following transaction on 2020-JAN-27 that could be considered unusual.

Patron: [REDACTED] (SID 16422) - listed occupation - "CEO-Huang Ming Agriculture Co."

Although [REDACTED] could have access to a level of wealth with funds coming from a recognized financial institution, [REDACTED] has been involved in six (6) incidents involving exchange of cash/chips and unusual activity, albeit dated in 2011.

The following could be considered unusual:

1. Bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution such a bank, atm, or global cash&win.
2. BC casinos do not issue large casino disbursements using small denominational bills.
3. [REDACTED]'s lack of BC-RRCR Casino disbursements make it unlikely that these funds originated from a recent casino disbursement.
4. The method in which the bills were packaged (bundles of \$20 + elastics) has been an indicator funds are from questionable sources.
5. Although [REDACTED] has not visited RRCR, it appears he was aware of BCLC SOF requirements as he removes two bills from his buy-in that would meet/reach FINTRAC-LCT reportable threshold and BCLC SOF requirements.

Footage shows the following with times approximate:

At 21:10 [REDACTED] arrives on site as a passenger in a Tesla (possible l/p HS798X), [REDACTED] and UNAM enter casino east entrance and take elevator to salon.

At 21:25 [REDACTED] places brick of \$50s and \$20s at MDB25 for table buy-in. [REDACTED] keeps 1xbundle of \$50s in his pocket.

DLR removes elastic bands and completes the count for a total of \$8K (370x\$20 and 12x\$50).

[REDACTED] receives chips and begins game play. UNAM does not participate in gaming activity.

At 22:07 [REDACTED] removes a bundle of \$50s from his pocket, removes 2x\$50 and places the bundle of \$50s for table buy-in at MDB25. DLR removes elastic bands and completes the count for a total of \$1.9K (38x\$50). [REDACTED] receives chips and begins game play.

Footage JAN20\UFT\20-06510

MLIANZA
30068

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

SP20200016711 Attached by jklam on Jan 31, 2020 14:46

Description The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Amounts involved in line with or less than past buy in amounts
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

On 2020-JAN-27 at River Rock Casino, patron [REDACTED] (SID 16422) conducted buy-in just under reporting threshold, totaling \$9,900 comprised entirely of \$20 and \$50 bills.

RESULTS OF FOOTAGE REVIEW (all times approximate):

2020-JAN-27 – 21:10 hours – patron [REDACTED] (SID 16422) arrived to the site with an unidentified male associate, via blue Tesla vehicle at the valet, by the east entrance. The patrons proceeded to the Salon.

21:25 hours, table MDB25 – [REDACTED] arrives to the table and presents a stack of mix \$20 bills and \$50 bills (bounded by elastic bands) for buy-in. The buy-in totaled \$8,000 (370x\$20 bills, 12x\$50 bills) and patron commenced game play upon receiving chips. His associate accompanied him at the table however did not participate.

22:07 hours, table MDB25 – [REDACTED] conducted an additional buy-in of \$1,900 (38x\$50 bills). It was noted that patron kept \$100 (2x\$50 bills) from the bundle before presenting for buy-in. He continues to game play upon receiving chips.

22:15 hours, table MDB25 – Upon losing his bankroll, [REDACTED] departed from the table with his associate. No further footage or documentation provided on his departure from the site.

CONCLUSION/ACTION TAKEN:

Based on the above information a STR will not be submitted to FinTRAC at this time.

[REDACTED] is associated to sixteen (16) incidents in total, six (6) are unusual financial transactions (UFT), and 2 of which were assessed as substantiated (dated 2008-2009). [REDACTED] has generated eighty-nine (89) large cash transactions (LCT) in BCLC facilities since 2006-JAN.

The investigator assesses that no unusual transaction took place as presented in this incident. Given the overall review of the patron's gaming session, the patron was gaming legitimately with no irregularities found. Although patron bought in with large quantities of \$20 bills (a portion being

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200006510

SP20200016711 Attached by jklam on Jan 31, 2020 14:46

SP2020001671

1 - Continued-

\$50 bills), footage and incident details indicated patron arrived with the cash with the intention to use for his own gaming. Total buy-in was valued below the reporting threshold hence no receipts were asked. Patron had no cash outs as he lost his entire bankroll by end of gaming session. Review of subject profile and previous incidents involving [REDACTED] does not raise any AML concerns that can further this incident. No other suspicious indicators were identified at this time.

Jenny Lam

BCLC AML Investigations

SP20200018311 Attached by sbEEKSMA on Feb 3, 2020 06:32

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA

BCLC - AML Project Specialist

SP20200045202 Attached by jklam on May 28, 2020 15:14

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

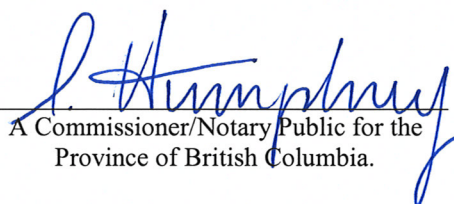
J.LAM

Investigator, BCLC AML Programs

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "KK"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ~~21st~~ ^{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200007634

Date/Time Occurred:	Redacted - RCMP	12:23 PM	Record Creation Details	
Day of Week Occurred:	Redacted - RCMP		Department:	Gaming Operations
Date/Time Created:	Redacted - RCMP	12:29 PM	Owner:	cng
Date/Time Closed:			Operator ID:	mkovacevic
Closed By:			Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position	
			Secondary Operator:	cng

Location of Incident:

Property: Parq Casino
 Location: Casino level 3
 Sublocation: MRYB 812

Details of Incident:

Daily Log #: DL20200102354
 Reference: ws#5
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Redacted - FINTRAC
 Incident Status: Closed
 Synopsis: Redacted - RCMP bought in for \$9,900 all in \$20's
 Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 12:30 PM	mkovacevic		
Redacted - RCMP bought in for \$9,900 all in \$20's			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200007634

Participants Involved:

Personnel

Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
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Role:	Documenter	Department:	BCLC
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Full Name:	KOVACEVIC, Menchie	Property:	Parq Casino
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Role:	Documenter	Department:	Surveillance
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Full Name:	NG, Charles	Property:	Parq Casino
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Role:	Info From	Department:	Tables
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Police Contacted:	Taken From Scene:	Police Contacted Result :
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Full Name:	LEI, Yvonne (Yifang)	Property:	Parq Casino
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Role:	Notified	Department:	Surveillance
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Subject

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

SP20200018587 Attached by mkovacevic on Redacted - RCMP 2:47

Description On gaming date Redacted - RCMP at approximately 12:23hrs, surveillance observed a buy ins on the table all in \$20's at MRYB812 for \$9,900. Shortly, surveillance received a call from Pit Manager Charles NG the identity of the patron. Surveillance followed the patron's activity in Jade EAST, he played 3 times with \$100 bet and coloured up \$10,000. He exited the salon and stayed briefly at Poker area and then he left via Douglas podium using elevator 6906 and exited at P3.

Redacted - RCMP bought in for \$9,900 all in \$20's.

Surveillance saved and review the time he arrived/left in the casino:

113948 arrived at P3 alone with his Redacted - RCMP

114938 went straight to Level3 but goes to Jade WEST / had smoke at smoking patio/ talked with the casino host and eventually

goes to Jade EAST.

120959 at the table MRYB812 Redacted - RCMP pulled bundles of \$20's from both side pockets of his black jackets, removed the 5x\$20 for \$100 just to record of not over \$10K LCT status.

122244 he received \$9,900 (9x\$1000/ 9x\$100)

123357- he coloured up \$10,000- (2X\$5000) and left the room, (did not cash out) stayed in poker area very briefly.

124203- he left the premises on the same car with chips on him.

All necessary footage was saved in the UFT folder.

Section #86 was filed to GPEB.

MKovacevic- 93733 (ws#5)

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200007634

SP20200018767 Attached by msdtehrani on [Redacted - RCMP] 18:15

Description Related footage is transferred to BCLC share drive AML Folder.
Massoud TEHRANI.

SP20200018816 Attached by cng on [Redacted - RCMP] 19:54

Description On gaming date [Redacted - RCMP] at approximately 12:25, I informed Surveillance that [Redacted - RCMP]
[Redacted - RCMP] bought in \$9,900 in all 20's on table MRYB812.

Charles NG
73169

SP20200019353 Attached by jklam on [Redacted - RCMP] 15:52

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

SP20200019353 Attached by jklam on Redacted - RCMP 5:52

SP2020001935

3 - Continued-



Redacted
- FINTRAC

B.C. Lottery Corporation file number(s) 2020-07634 refers.

Jenny LAM

BCLC – AML Investigations

SP20200019651 Attached by sbeeksma on Redacted - RCMP 08:03

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:39 PM

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BCLC0016425.04

Incident File Full Report

Incident File #IN20200007634

SP20200019651 Attached by sbeeksma on [Redacted - RCMP] 08:03

SP2020001965

1 - Continued-

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:39 PM

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BCLC0016425.05

List of Attached Forms:

Prefix

Form Name

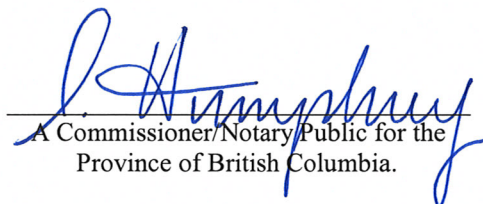
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Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "LL"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd

A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200008074

Incident Information		Record Creation Details	
Date/Time Occurred:	Redacted - RCMP 1:25 AM	Department:	Surveillance
Day of Week Occurred:	Redacted - RCMP	Owner:	anscott
Date/Time Created:	Redacted - RCMP 1:32 AM	Operator ID:	anscott
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: Parq Casino
Location: BOH Level 3
Sublocation: CD14

Details of Incident:

Daily Log #: DL20200108027
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Synopsis: Redacted - RCMP bought in \$9,900 in \$20s at CD12.
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 11:33 AM	anscott		
Redacted - RCMP bought in \$9,900 in \$20s at CD12.			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008074

Participants Involved:

Personnel

Full Name: POLIAKOV, Vladimir Property: Parq Casino

Role: Documenter Department: Surveillance

Full Name: SCOTT, Analyn Property: Parq Casino

Role: Documenter Department: Surveillance

Full Name: SAMARDZIC, Jela Property: Parq Casino

Role: Info From Department: Cage

Police Contacted: Taken From Scene: Police Contacted Result :

Full Name: VUONG, Stephanie (Linh Hue) Property: Parq Casino

Role: Info From Department: Tables

Police Contacted: Taken From Scene: Police Contacted Result :

Full Name: LEI, Yvonne (Yifang) Property: Parq Casino

Role: Notified Department: Surveillance

Subject

Full Name: Redacted - RCMP Company: Redacted - RCMP

Role: Patron

Supplemental Entries:

SP20200019714 Attached by anscott on Redacted - RCMP 11:34

Description On Redacted - RCMP at approximately 1125hrs, Cage Supervisor Jela SAMARDZIC and Floor Manager Stephanie VUONG reported of a \$9,900 buy in all in \$20s at CD14, and was permitted to buy and play at MDB302. Chips were received at 1136hrs at the same table.

A review pending....

WS4

ASCOTT

86103

SP20200019764 Attached by vpoliakov on Redacted - RCMP 3:29

Description On the date of Redacted - RCMP Surveillance conducted a tape review of Redacted - RCMP activity in the casino regarding a large cash buy-in in bills of small denomination (495x\$20 for \$9,900).

It was found that Redacted - RCMP arrived to the casino at approximately 11:15 driving a Redacted - RCMP which he parked in Parking P2, Stall #478. Redacted - RCMP took Douglass Elevator #11 to L3 gaming floor and moved to the Jade West, Salon#2. At 11:18 Redacted - RCMP retrieved two bundles of 20 bills from a

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008074

SP20200019764 Attached by vpoliakov on [Redacted - RCMP] 13:29

SP2020001976

4 - Continued-

pocket of his jacket and delivered them to the Cage, CD14. The bills we processed at CD13; CPV to MDB302 was issued for the full amount of \$9,900. At 11:30 [Redacted - RCMP] received chips for \$9,900 at MDB302. As well at 11:32 [Redacted - RCMP] coloured down at MDB302 2x\$5,000 chips, which he retrieved from his pocket.

[Redacted - RCMP] was observed playing at MDB302 a slow game with minimum play, average bets for \$500.

At approximately 12:57 [Redacted - RCMP] left MDB302 and delivered his chips for \$12,910 to the Cage for cash out. A verified win cheque #13783 was created for \$3,000; \$9,900 of the initial buy-in was returned to [Redacted - RCMP] in \$20 bills. At approximately 13:50 [Redacted - RCMP] repeated his buy-in for \$9,900 at MDB302. He collected his chips and immediately left MDB302 and Jade West in company of an unknown Asian male associate.

Pertinent footage has been saved to 'UTF' folder

A Section 86 Form sent to GPEB

V.POLIAKOV, #52488

SP20200019829 Attached by ylel on [Redacted - RCMP] 15:20

Description Footage transferred to BCLC shared drive.

Y Lei #34141

SP20200020316 Attached by jklam on [Redacted - RCMP] 12:04

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

SP20200020316 Attached by jklam on Redacted - RCMP 12:04

SP2020002031

6 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

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BCLC0016426.04

SP20200020316 Attached by jklam on [Redacted - RCMP] 12:04

SP2020002031

6 - Continued-



Redacted
- FINTRAC

B.C. Lottery Corporation file number(s) 2020-08074 refers.

Jenny LAM

BCLC – AML Investigations

SP20200020360 Attached by sbeeksma on [Redacted - RCMP] 13:21

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/ 7/2020 2:40 PM

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BCLC0016426.05

List of Attached Forms:

Prefix

Form Name

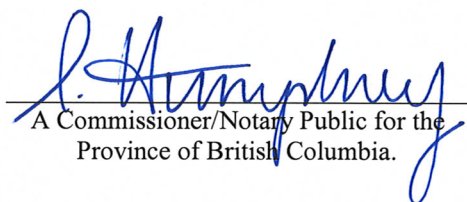
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Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "MM"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS ^{21st}_{22nd} DAY OF OCTOBER, 2020.


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200008140

Date/Time Occurred:	Redacted - RCMP	:16 PM	Record Creation Details	
Day of Week Occurred:	Redacted - RCMP		Department:	Surveillance
Date/Time Created:	Redacted - RCMP	:00 PM	Owner:	anscott
Date/Time Closed:			Operator ID:	anscott
Closed By:			Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position:	
			Secondary Operator:	

Location of Incident:

Property: Parq Casino

Location: Casino level 3

Sublocation: MDB 815

Details of Incident:

Daily Log #: DL20200108548

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Synopsis: Redacted - RCMP bought in for \$9,000 all in \$20s (450x\$20) on MDB815.

Checklist:

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
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Redacted - RCMP	3:00 PM	anscott
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Redacted - RCMP bought in for \$9,000 all in \$20s (450x\$20) on MDB815.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008140

Participants Involved:

Personnel

Full Name:	SCOTT, Analyn	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	NGUYEN, Thi Loan	Property:	Parq Casino
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	LEI, Yvonne (Yifang)	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

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

Ban/Watch Details

Full Name	Ban/Watch	Start Date	End Date
Redacted - RCMP	Watch	Redacted - RCMP	Permanent
Type Of Ban:		Notes:	
Reason For Ban:			
Identification:			

Supplemental Entries:

SP20200019894 Attached by anscott on Redacted - RCMP 15:02

Description On Redacted - RCMP at approximately 1416hrs, Pit Manager Thi Loan NGUYEN reported a buy in of \$9,000 all in \$20s (450x\$20) from patron Redacted - RCMP at MDB815.

Review shows the following events:

At 1333hrs Redacted - RCMP arrived in front of the casino driving Redacted - RCMP dropped off his car and headed to L3 gaming floor at Jade East taking escalator.

At 1406hrs Redacted - RCMP entered the washroom with Redacted - RCMP and went separate ways.

At 1409hrs Redacted - RCMP bought in \$9,000 all in \$20s at MDB815. Received his chips and walked out with Redacted - RCMP and went to the washroom by Lotus Lounge together at 1429hrs and got out together 1431hrs.

At 1431hrs Redacted - RCMP with Redacted - RCMP at the poker desk then later Redacted - RCMP went back at Jade East Salon.

At 1436hrs, MDB813, Redacted - RCMP just sat at the table, no play and left salon and went back at the

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200008140

SP20200019894 Attached by anscott on [Redacted - RCMP] 15:02

SP2020001989

4 - Continued-

poker desk.

At 1441-1447hrs, MDB813 [Redacted - RCMP] played with \$300-\$500 bet for just a few minutes.

At 1451-1459hrs, MDB815 [Redacted - RCMP] played for a few minutes with \$300 bet.

At 1459-15-08hrs, he was seen played at MDB813.

At 1527hrs [Redacted - RCMP] was seen heading out taking the escalator down to P1 where he waited for his car and driven off.

Section 86 sent to GPEB

Footage saved under UFT folder

WS1

ASCOTT

86103

SP20200020228 Attached by ylel on [Redacted - RCMP] 09:57

Description Footage has been transferred to BCLC shared drive.

Y Lei #34141

SP20200020919 Attached by jklam on [Redacted - RCMP] 14:38

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

Page 3 / 6

BCLC0016427.03

SP20200020919 Attached by jklam on Redacted -
RCMP 14:38

SP2020002091

9 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

Page 4 / 6

BCLC0016427.04

SP20200020919 Attached by jklam on Redacted -
RCMP 14:38

SP2020002091

9 - Continued-



Redacted
- FINTRAC

B.C. Lottery Corporation file number(s) 2020-08140 refers.

Jenny LAM

BCLC – AML Investigations

SP20200022481 Attached by sbeeksma on Redacted -
RCMP 07:01

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:40 PM

Page 5 / 6

BCLC0016427.05

List of Attached Forms:

Prefix

Form Name

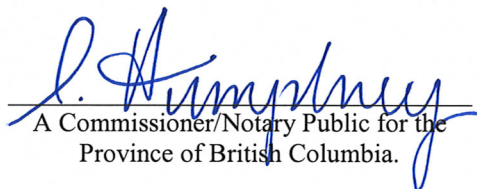
A

Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "NN"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200009014

Incident File Full Report		Record Creation Details	
Date/Time Occurred:	2/ 8/2020 8:10 PM	Department:	Surveillance
Day of Week Occurred:	Saturday	Owner:	jcheung
Date/Time Created:	2/ 9/2020 5:50 AM	Operator ID:	jcheung
Date/Time Closed:	2/12/2020 9:10 AM	Operator Name:	
Closed By:	glau	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)

Location: Casino Floor-River Rock (GCC)

Sublocation: RYB 01

Details of Incident:

Daily Log #: DL20200118964

Type: Gaming

Specific: Unusual Financial Transaction

Category: Unsubstantiated

Incident Status: Closed

Synopsis: SID 73504 B/I \$9.9K in 100's RYB01 @ 20:10H.

Checklist: - Section 86 Form

Narrative:

Created On	Created By	Modified On	Modified By
2/ 9/2020 5:50 AM	jcheung		
[REDACTED] (SID 73504) B/I \$9.9K in 100's RYB01 @ 20:10H.			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009014

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	[REDACTED]	Company:	CEO - Fuan Mining Company
Role:	Accused		
Full Name:	[REDACTED]	Company:	
Role:	Accused		

Supplemental Entries:

SP20200021910 Attached by jcheung on Feb 9, 2020 06:18

Description At approx 20:09hrs, surveillance was informed by DSV Roy of a 9.9K CDN (99 x \$100s) buy-in by [REDACTED] (SID 73504) on RBY 1.

Review showed the following:

19:46hrs - [REDACTED] arrived on site in a Grey Porsche Cayenne (LP: GW8 27J) as a passenger driving by [REDACTED] (SID 87711). The car was parked in the South Parkade P4 (Vip Parking).

19:51hrs - [REDACTED] entered via East Lobby and walked to RYB 1.

19:58hrs - [REDACTED] sat down at RYB 1.

20:03hrs - [REDACTED] places a bunch of \$100s onto RYB 1.

20:09hrs - The count finished and the grand total amount of the buy-in is 9.9K CDN (99 x \$100s) and [REDACTED] received 8 x \$1000s, 3 x \$500s, 4 x \$100s in chips.

20:13hrs - After [REDACTED] received his chips, [REDACTED] went to MDB 10 to game. By 20:51hrs, it was observed that [REDACTED] had lost all his chips.

After [REDACTED] lost all his chips, [REDACTED] was seen on the phone for an extended period of time.

21:43hrs - [REDACTED] walks out of East Lobby and stands by Concierge, still on his phone.

21:46hrs - [REDACTED] walks out of East Lobby.

21:47:08hrs - [REDACTED] goes into the passenger side of the same vehicle that he arrived in (looks to be driven by [REDACTED] left site after [REDACTED] left. Please ref to IN 20-09013 for more information.

21:48:08hrs - [REDACTED] exits the vehicle and walks back into East Lobby and goes straight to Salon.

21:51hrs - [REDACTED] enters Salon.

Reporting Party:

Supervisor:

SP20200021910 Attached by jcheung on Feb 9, 2020 06:18

SP2020002191

0 - Continued-

walks around Salon before settling down on MDB 30 to game. [redacted] was seen pulling out chips.

Footage saved: M:\02 FEB 2020\UFT

CHEUNG, Janson

68632

SP20200023696 Attached by glau on Feb 12, 2020 09:09

Description	The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.
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Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patron arrived at the casino with the funds used on his/her person.

RE: Cash/Chip Passing

Name: [REDACTED] (f)

BCID: BCDL # [REDACTED]

BCLC SID: 87711

DOB: [REDACTED]

Address:

Home Phone Number:

Occupation: housewife

Encore/ Gold Card:

ITRACK profile (Started in 2010-OCT-03) – 5 Incidents, 4 UFTs, 0 Substantiated, 8 Media, 1 vehicles, 1 Associates

LCTs (2) – Buy In total \$30,000. Disbursement \$45,000

Name (m)

BCID: CN Passport # [REDACTED]

BCLC SID: 73504

DOB: [REDACTED]

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009014

SP20200023696 Attached by glau on Feb 12, 2020 09:09

SP2020002369

6 - Continued-

Address: [REDACTED]

Home Phone Number:

Occupation: Owner – Hong De Xing JingGong Group (Raw material trading)

Encore/ Gold Card:

ITRACK profile (Started in 2010-OCT-03) – 5 Incidents, 4 UFTs, 0 Substantiated, 8 Media, 1 vehicles, 1 Associates

LCTs (66) – Buy in Range \$8500 - \$230,000. Buy In total \$2,198,195. Foreign Exchange \$165,261.81. Acct Deposit \$400,000. Disbursement \$2,112,150

SUMMARY: Incident noted, details reviewed.

2020-FEB-08

On this date, patron [REDACTED] (f) SID #87711 was seen arriving the Riverrock Casino in Richmond, BC with patron [REDACTED] (m) SID# 73504. [REDACTED] entered the casino and conducts a buy in for \$9,000 (all \$100s). [REDACTED] did not game but did take her chips and left the casino in the same vehicle. [REDACTED] also conducts a buy in at the same table (RYB1) for \$9,900 (all in \$100s).

[REDACTED] gamed at MDB 19 and lost all his chips [REDACTED] then goes out of the casino and meets up with [REDACTED] to possibly get more chips. [REDACTED] was seen shortly thereafter by surveillance pulling out chips for gaming.

2020-FEB-09

On this date, patrons [REDACTED] and [REDACTED] arrived at the Riverrock Casino. [REDACTED] goes to the Bacarrat room and buys in for \$9,900 (all in \$100s). [REDACTED] received chips and started gaming. [REDACTED] was seen by surveillance buying in for \$ 9,000. [REDACTED] receives the chips and exited the casino without gaming. [REDACTED] meets up later with [REDACTED] and [REDACTED] was seen by surveillance placing something (possibly Chips) into [REDACTED]s jacket.

After the transaction, both entered salon and began gaming ta MDB71. Both [REDACTED] and [REDACTED] were questioned and warned by casino security about their chip and cash passing. Both [REDACTED] And [REDACTED] did not have receipts to support their gaming fund.

SURVEILLANCE:

2020-FEB-08

19:46 hrs - [REDACTED] drove on site in a Grey Porsche Cayenne (LP: GW8 27J) and parked on South Parkade P4 (Salon VIP Parking) with [REDACTED] SID 73504) in the passenger seat.

19:51hrs - [REDACTED] entered via East Lobby and walked to RYB 1.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009014

SP20200023696 Attached by glau on Feb 12, 2020 09:09

SP2020002369

6 - Continued-

19:54hrs - She placed a bunch of \$100s onto the table for a buy-in.

19:58hrs - The count finished and the final count was 9K (all 100s). [REDACTED] received 7 x \$1000, 2 x \$500, 10 x \$100 in chips. After receiving her chips, [REDACTED] walked around Dogwood before making her way to her car and left site at 20:10hrs. [REDACTED] sat down at RYB 1.

20:03hrs - [REDACTED] places a bunch of \$100s onto RYB 1.

20:09hrs - The count finished and the grand total amount of the buy-in is 9.9K CDN (99 x \$100s) and [REDACTED] received 8 x \$1000s, 3 x \$500s, 4 x \$100s in chips.

20:13hrs - After [REDACTED] received his chips, [REDACTED] went to MDB 10 to game. By 20:51hrs, it was observed that [REDACTED] had lost all his chips. After [REDACTED] lost all his chips, [REDACTED] was seen on the phone for an extended period of time.

21:43hrs - [REDACTED] walks out of East Lobby and stands by Concierge, still on his phone.

21:46hrs - [REDACTED] walks out of East Lobby.

21:47 hrs - [REDACTED] goes into the passenger side of the same vehicle that he arrived in (looks to be driven by [REDACTED]). It looks like he was getting something. [REDACTED] left site after [REDACTED] left.

21:48 hrs - [REDACTED] exits the vehicle and walks back into East Lobby and goes straight to Salon.

21:51hrs - [REDACTED] enters Salon. [REDACTED] walks around Salon before settling down on MDB 30 to game. [REDACTED] was seen pulling out chips.

2020-FEB-09

14:14 hrs - [REDACTED] and [REDACTED] arrive on site in a Cayenne (l/p GW827J). [REDACTED] goes to salon premium baccarat room-MDB71 and buys-in \$9.9K (99x\$100). [REDACTED] enters main gaming floor and goes to Maple Leaf baccarat room-KKB35 and buys-in \$9K (90x\$100). [REDACTED] receives 7x\$1K and 4x\$500 in chips and leaves casino east entrance. [REDACTED] receives chips and begins to game at MDB71. [REDACTED] receives chips and leaves the casino and waits outside salon entrance.

14:27 hrs - Both [REDACTED] and [REDACTED] accessed their phone, with [REDACTED] leaving MDB71.

14:31 hrs - [REDACTED] exits the salon and opens his left jacket pocket and [REDACTED]s hand enters the jackpot pocket - it is suspected a transfer of chips occurred at this point from [REDACTED] to [REDACTED] and [REDACTED] enter salon and go to MDB71 and [REDACTED] continues to game.

CONCLUSION/ACTIONS TAKEN:

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

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009014

SP20200023696 Attached by glau on Feb 12, 2020 09:09

SP2020002369

6 - Continued-

In this case patron identified as [REDACTED] (SID#73504) had bought-in for \$9,900 on 2020-FEB-08 and \$9,900 on 2020-FEB-09. All of [REDACTED]'s buy in were with \$100s [REDACTED] was not approached to provide receipt as the buy ins were under the \$10,000 threshold within the 24 hr period.

[REDACTED] associate, [REDACTED] was also noted to have bought in for \$9,000 on 2020-FEB-08 and \$9,000 on 2020-FEB-09. All of [REDACTED]'s buy in were with \$100s also. [REDACTED] was not approached to provide receipt as the buy ins were under the \$10,000 threshold within the 24 hr period.

The writer noted that on 2 occasions, it appears that [REDACTED] was passing chips to [REDACTED] after [REDACTED] had lost all his buy ins while gaming.

Based on the facts, it appears that [REDACTED] is trying to avoid the 24-hour reporting threshold rule. [REDACTED] is working with [REDACTED] to avoid the threshold. It also appears that [REDACTED] is doing this more out of convenience.

A review of [REDACTED]'s subject profile was done. [REDACTED] has no substantiated UFT on file. [REDACTED] have been generating LCTR since Nov/2009 with past buy-in ranging from \$8500 to \$230,000 per gaming session.

It was noted in the report that on these dates, [REDACTED] had the following Buy ins and Disbursements:

2020-JAN-27	Buy in	\$9,900	Disbursement	\$40,000
LCT 20-4348				
2020-JAN-29	Buy in	\$20,000	Disbursement	\$95,000
LCT 20-4597				
2020-FEB-09	Buy In	\$0	Disbursement	\$20,000

Although [REDACTED] was unable to provide receipts to source his buy ins and appears to also be avoiding the 24hr reporting threshold, his recent disbursements could easily explain his SOF. The disbursements all came from the same casino. The casino would not be able to source [REDACTED]'s disbursement after 48 hrs. The \$95,000 disbursements (LCT 20-4597) could reasonably explain [REDACTED]'s SOF.

The writer reviewed [REDACTED]'s gaming habits and past buy ins. All appeared normal and in line with his past activities.

There is no information to indicate that [REDACTED] or [REDACTED]'s funds were likely sourced from the proceeds of crime or that their activities at the Riverrock Casino on 2020-FEB-08 and 2020-FEB-09 was anything other than an attempt at legitimate gambling.

X-Ref to 20-9013, 20-9079 and 20-9083.

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

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200009014

SP20200023696 Attached by glau on Feb 12, 2020 09:09

SP2020002369

6 - Continued-

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

Gerald Lau

BCLC AML Investigations

SP20200023705 Attached by sbEEKSMA on Feb 12, 2020 09:37

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements
for FINTRAC reporting therefore can be concluded this point without further action.

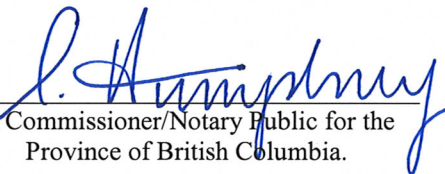
SBEEKSMA

BCLC - AML Project Specialist

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "OO"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200010193

Date/Time Occurred:		4:42 PM	Record Creation Details	
Day of Week Occurred:		Redacted - RCMP	Department:	Surveillance
Date/Time Created:		4:43 PM	Owner:	asekhon
Date/Time Closed:			Operator ID:	asekhon
Closed By:			Operator Name:	
			Personnel ID:	
			Card Number:	
			Job Position:	
			Secondary Operator:	

Location of Incident:

Property: Starlight Casino (GC)

Location: Casino Floor-Starlight Casino

Sublocation: MDB 10

Details of Incident:

Daily Log #: DL20200137021

Related Incidents: IN20200011366

Type: Gaming

Specific: Unusual Financial Transaction

Category: Redacted - FINTRAC

Incident Status: Closed

Synopsis: Redacted - RCMP Bought in for \$9820 all in \$20 bills

Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
Redacted - RCMP 4:43 PM	asekhon	Redacted - RCMP 4:48 PM	asekhon
Redacted - RCMP Bought in for \$9820 all in \$20 bills			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010193

Participants Involved:

Personnel

Full Name:	LAU, Gerald	Property:	Hard Rock Casino (GCC)
Role:	Documenter	Department:	BCLC
<hr/>			
Full Name:	PINEDA, Alfonso Esteban	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Cage
<hr/>			
Full Name:	SEKHON, Avsimran	Property:	Starlight Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

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

Supplemental Entries:

SP20200024966 Attached by asekhon on Redacted - RCMP 17:24

Description On Redacted - RCMP at approximately 16:35 hrs Surveillance received a call from Cage

Supervisor Alfonso PINEDA of a Large buy in of \$9,820 all in \$20 bills from patron Redacted - RCMP

Redacted - RCMP Surveillance observed the following.

16:16:08hrs Redacted - RCMP arrives on site in a Redacted - RCMP and parks in the RED zone of the underground parking lot. After parking Redacted - RCMP heads toward the main entrance.

16:18:44hrs Redacted - RCMP enters the Casino and goes up the escalator towards the Casino lobby.

16:19:31hrs Redacted - RCMP enter the Casino gaming floor and walks to wards the VIP room.

16:19:55hrs Redacted - RCMP enter the VIP room and walks towards the Casino cash cage.

16:21:56hrs Redacted - RCMP arrives at the VIP cash cage (CD11) and places a bundle of \$20 bills on the cash desk.

16:30:52hrs The bundle is counted in the Jet. Surveillance was informed by the Cage that the total buy-in for \$9,820. The breakdown as follow:

491 x \$20= \$9,820.00

16:45:42hrs Redacted - RCMP receives he's \$9,820 buy-in in chips at MDB10. The breakdown as follow:

19 x \$500= \$9,500.00

3 x \$100= \$300.00

4 x \$5= \$20

\$9,820.00

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010193

SP20200024966 Attached by asekhon on [Redacted - RCMP] 17:24

SP2020002496

6 - Continued-

[Redacted - RCMP] bought in for a total of \$9,920.00 and began his play at MDB10.

21:24:48hrs [Redacted - RCMP] chips out at MDB10. The breakdown as follows:

50x \$500= \$25,000

5x \$100= \$500

4x \$25= \$100

\$25,600

[Redacted - RCMP] receives \$25,600 in chips from MDB10. Break down as follows:

5x \$5000= \$25,000

1x \$500= \$500

1x \$100= \$100

\$25,600

21:27:23hrs [Redacted - RCMP] arrives at the VIP cash cage and places chips at the cash desk to cash out.

Breakdown as follow:

3x \$5000= \$15,000

1x \$500= \$500

1x \$100= \$100

1x \$25= \$25

\$15,625

21:31:31hrs [Redacted - RCMP] receives \$15,625 from the VIP cash cage. Break down as follow:

156x \$100= \$15,600

2x \$20= \$20

1x \$5= \$5

\$15,625

After receiving the cash [Redacted - RCMP] exits the VIP room.

21:32:22 [Redacted - RCMP] exits the gaming floor, and proceeds to the underground parking red zone, then enters the same vehicle he arrives in and drives off site.

END OF REPORT

Section 86 form sent

Footage saved in Y:\Suspicious Financial Transaction [Redacted - RCMP] 10193 02-14-20 [Redacted - RCMP]

[Redacted - RCMP] \$9,820

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010193

SP20200024966 Attached by asekhon on [Redacted - RCMP] 17:24

SP2020002496

6 - Continued-

Avsimran SEKHON
GPEB 89186

SP20200027686 Attached by glau on [Redacted - RCMP] 12:53

Description



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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BCLC0016430.04

SP20200027686 Attached by glau on

Redacted -
RCMP

 12:53

SP2020002768

6 - Continued-



Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

Page 5 / 8

BCLC0016430.05

SP20200027686 Attached by glau on Redacted - RCMP 12:53

SP2020002768

6 - Continued-

Redacted
- FINTRAC

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

Page 6 / 8

BCLC0016430.06

SP20200027686 Attached by glau on [Redacted - RCMP] 12:53

SP2020002768

6 - Continued-

Redacted - FINTRAC

B.C. Lottery Corporation file number(s) 2020-10193 refers.

Gerald Lau

BCLC – AML Investigations

SP20200028156 Attached by sbeeksma on [Redacted - RCMP] 6:45

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

SP20200030824 Attached by jaddison on [Redacted - RCMP] 12:12

Description

[Redacted - RCMP]

- Surveillance uploaded this file for GPEB to the FTP server this date.

Reporting Party:

Supervisor:

List of Attached Forms:

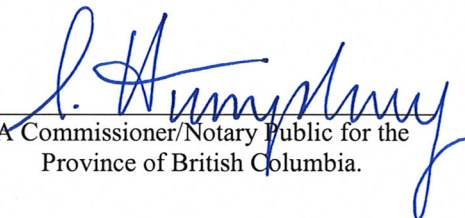
Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "PP"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.

22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200010661

		Record Creation Details	
Date/Time Occurred:	4:40 AM	Department:	Surveillance
Day of Week Occurred:	Redacted - RCMP	Owner:	ldawatis
Date/Time Created:	5:47 AM	Operator ID:	ldawatis
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

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

Details of Incident:

Daily Log #: DL20200142298
Reference: WS2
Type: Gaming
Specific: Unusual Financial Transaction
Category: Redacted - FINTRAC
Incident Status: Closed
Synopsis: Unknown, Asian, Male has accumulated \$8,120 in cash buys in all in \$20 bills.
Checklist: - Section 86 Form

Redacted - FINTRAC

Narrative:

Created On	Created By	Modified On	Modified By
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Redacted - RCMP	5:47 AM	ldawatis	
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Unknown, Asian, Male has accumulated \$8,120 in cash buys in all in \$20 bills.

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010661

Participants Involved:

Personnel

Full Name:	DAWATIS, Louie	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	LAM, Jenny	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	NG, Charles	Property:	Parq Casino
Role:	Info From	Department:	Tables

Police Contacted: Taken From Scene: Police Contacted Result :

Full Name:	ZUNIGA, Alberto	Property:	Parq Casino
Role:	Notified	Department:	Surveillance

Subject

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

Ban/Watch Details

<u>Full Name</u>	<u>Ban/Watch</u>	<u>Start Date</u>	<u>End Date</u>
Redacted - RCMP	Watch	Redacted - RCMP	Permanent

Type Of Ban:

Notes:

Reason For Ban:

Identification:

Supplemental Entries:

SP20200025955 Attached by Idawatis on Redacted - RCMP 05:51

Description On Redacted - RCMP at approximately 04:40 hrs, Pit Manager NG, Charles informed Surveillance that a Patron now being referred to as, Redacted - RCMP has accumulated \$8,120 (\$20x406) in cash buy ins. According to NG, the Patron was allowed to buy and will be returned all his \$20s bills upon cash out. His play was briefly watched and he was wagering on average \$300.

A tape review of his activities found the following:

03:14 hrs - Patron arrived on site on foot via the JW Marriot Entrance Doors by himself.

03:17 hrs - Patron conducts a \$3,120 cash buy in all in \$20s at MDB312.

03:57 hrs - Patron conducts a \$5,000 cash buy in all in \$20s at MDB312.

Patron is still as of 06:59 hrs.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200010661

SP20200025955 Attached by ldawatis on [Redacted - RCMP] 05:51

SP2020002595

5 - Continued-

Station #2.

A section 86 report has been sent to GPEB.

Available footage saved in "UFT" folder under the incident number.

Surveillance Operator

DAWATIS, Louie

GPEB#76441

SP20200026345 Attached by azuniga on [Redacted - RCMP] 00:53

Description Subject stopped playing at 0942hrs cashing out \$4,065 at Cd13 and left off site at 0948hrs on foot via the JW Marriott Entrance Doors by himself.

AZUNIGA

85044

SP20200027077 Attached by ylel on [Redacted - RCMP] 11:33

Description Footage has been transferred to BCLC shared drive.

Y Lei #34141

SP20200028838 Attached by jklam on [Redacted - RCMP] 11:25

Description

Redacted
- FINTRAC

Reporting Party:

Supervisor:

SP20200028838 Attached by jklam on Redacted -
RCMP 11:25

SP2020002883

8 - Continued-



Redacted
- FINTRAC

B.C. Lottery Corporation file number(s) 2020-10661 refers.

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:44 PM

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BCLC0016431.04

Incident File Full Report

Incident File #IN20200010661

SP20200028838 Attached by jklam on [Redacted - RCMP] 11:25

SP2020002883

8 - Continued-

Jenny LAM

BCLC – AML Investigations

SP20200028852 Attached by sbEEKSMA on [Redacted - RCMP] 12:16

Description On the above date copies of this reports narrative were transferred to the SFTP for GPEB, JIGIT.

S.BEEKSMA

BCLC

AML Project Specialist

Reporting Party:

Supervisor:

List of Attached Forms:

Prefix

Form Name

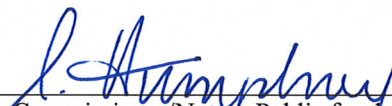
A

Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS **EXHIBIT "QQ"** TO THE
AFFIDAVIT OF STEVEN BEEKSMA
AFFIRMED BEFORE ME AT VANCOUVER, BC
THIS 21st DAY OF OCTOBER, 2020.
22nd


A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report

Incident File #IN20200016347

		Record Creation Details	
Date/Time Occurred:	3/10/2020 9:21 PM	Department:	Surveillance
Day of Week Occurred:	Tuesday	Owner:	jmontero
Date/Time Created:	3/10/2020 9:22 PM	Operator ID:	jmontero
Date/Time Closed:	3/11/2020 1:43 PM	Operator Name:	
Closed By:	lcousins	Personnel ID:	
		Card Number:	
		Job Position	
		Secondary Operator:	

Location of Incident:

Property: River Rock (GCC)
 Location: Casino Floor-River Rock (GCC)
 Sublocation: MDB 31

Details of Incident:

Daily Log #: DL20200217000
 Type: Gaming
 Specific: Unusual Financial Transaction
 Category: Unsubstantiated
 Incident Status: Closed
 Synopsis: [REDACTED] SID 56671) B/I \$9.7K in \$50 bills on MDB31.
 Checklist: - Section 86 Form
 Narrative:

Created On	Created By	Modified On	Modified By
3/10/2020 9:22 PM	jmontero		

[REDACTED] SID 56671) B/I \$9.7K in \$50 bills (194 x \$50s) on MDB31.

Executive Brief:

Participants Involved:

Personnel

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

Subject

Full Name: [REDACTED] Company: JiYu investment Ltd.
 Role: Accused

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016347

Supplemental Entries:

SP20200040218 Attached by jmontero on Mar 10, 2020 21:30

Description At approximately 21:15 hours on March 10, 2020, surveillance noticed a large buy-in on MDB31 comprised of \$50 bills. The buy-in totaled \$9,700 and was from patron [REDACTED]

[REDACTED] has an extensive history of UFT incidents and is associated to a number of high risk patrons. [REDACTED]'s occupation - Company Shareholder at Jiyu investment ltd. - may account for the source of wealth, but does not account for why [REDACTED]'s buy-in was in small denominations.

Review showed [REDACTED] arrive on site at the south parkade at 21:06 as a passenger in a black BMW SUV BCLP: JW138B. They park on P4 and [REDACTED] exits on the passenger side. Three other Asian male individuals exit the vehicle. No passes or exchanges are seen.

At 21:11 hours, [REDACTED] presents a bundle of \$50 bills on MDB31 held together by rubber bands. After the buy-in is accepted and [REDACTED] receives his chips, he gambles normally.

Footage saved M:/2020/03 March 2020/UFT. Section 86 form sent.

Justin MONTERO
Surveillance Relief Supervisor
83905

SP20200040607 Attached by lcousins on Mar 11, 2020 13:38

Description The individual who conducted the transaction(s) has no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Established/known business relationship
- Checked associates, past incidents, Large Cash Transaction (LCT), Open Source Intelligence (OSINT) etc where applicable
- Amounts involved in line with or less than past buy in amounts
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Confirmed Source Of Wealth (SOW) via OSINT report:
 - Confirming occupation/company.
 - Confirming residential ownership.
 - Any other wealth indicators contained within the OSINT.
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20200016347

SP20200040607 Attached by lcousins on Mar 11, 2020 13:38

SP2020004060

7 - Continued-

On 2020-MAR-10 [REDACTED] (m) (SID#56671) presented 194x\$50=\$9.7 for buy in at RRCR. Surveillance at the site has deemed the buy in suspicious. [REDACTED] was not asked for a receipt by site staff.

Incident details (all times are approximate):

2020-03-10 (INC200016347)

21:06 hrs

[REDACTED] (SID#56671) arrived on site at the south parkade as a passenger in a black BMW SUV BCLP: JW138B. The vehicle was parked on P4 and [REDACTED] exited on the passenger side. Three other Asian male individuals also exited the vehicle. No passes or exchanges observed.

21:11 hrs

The four men crossed over the Skywalk and proceeded directly to the Salon where [REDACTED] removed a bundle of \$50 bills (sorted) from his inside left pocket. [REDACTED] removed an elastic and a number of bills from the bundle and placed the remaining bills on MDB31 for buy in. After the count the buy in was confirmed to be \$9,700.

21:21 hrs

[REDACTED] received his chips, moved to MDB 26 to join his colleagues.

No irregularities were noted in [REDACTED]s play.

[REDACTED] was noted to be putting reasonable amounts at risk.

[REDACTED] has been placed on sourced cash chip conditions as he appears to be avoiding receipting requirements.

[REDACTED] will be monitored moving forward with matters escalated as deemed appropriate.

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

L. Cousins

BCLC AML Investigations

SP20200041485 Attached by sbEEKSMA on Mar 13, 2020 11:22

Description

File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

\$9500 in \$50's, player placed on conditions as a preventative measure.

SBEEKSMA

Reporting Party:

Supervisor:

Printed: 10/7/2020 2:54 PM

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BCLC0016446.03

Incident File Full Report

Incident File #IN20200016347

SP20200041485 Attached by sbeeksma on Mar 13, 2020 11:22

SP2020004148

5 - Continued-

BCLC - AML Project Specialist

SP20200045687 Attached by lcousins on Jun 10, 2020 15:52

Description

As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

L. Cousins

BCLC AML Investigations

Reporting Party:

Supervisor: