

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Daryl Tottenham, of 2940 Virtual Way, Vancouver, British Columbia, SWEAR THAT:

1. I am the Manager, Anti-Money Laundering (“AML”) Programs for British Columbia Lottery Corporation (“BCLC”), a participant in this Commission of Inquiry (the “Inquiry”), and as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where such facts and matters are stated to be made upon information and belief, and as to such facts and matters I verily believe them to be true.
2. I swear this affidavit to provide evidence to the Commission of Inquiry into Money Laundering in British Columbia pursuant to a summons issued to me pursuant to the *Public Inquiry Act*, and to correct earlier evidence I provided.
3. I prepared two earlier affidavits for use in this Inquiry, both sworn October 30, 2020.
4. At Exhibit 82 of my Affidavit #1, I attach a BCLC review of an audit conducted by the Gaming Policy Enforcement Branch (“GPEB”) in 2016 of provincially banned cash facilitators, also known as the “COMM-8669 Report”. As set out in Exhibit 82 of my Affidavit #1, the COMM-8669 Report reviewed 45 specific incidents and concluded that casino sites “knowingly accepted cash that they acknowledged was obtained from a banned individual and appeared of questionable source.” I understand the COMM-8669 Report is attached as Exhibit 21 to the Affidavit #1 of Rob Kroeker and Exhibit S to the Affidavit #1 of Len Meilleur in this Inquiry.
5. I testified at this Inquiry on November 4, November 5, and November 10, 2020. In the course of my examination by counsel for Rob Kroeker on November 10, 2020, I was

*QCTO*

asked about the COMM-8669 Report. In response to a question from counsel for Mr. Kroeker about the report, I stated as follows:


... in all instances I went back and basically opened each file and did a full review of the evidence, and what I could find of the video, anything that was in the file, and made a determination that in not one instance out of 45 was that information available and done in real time. It was all done after the fact through investigations.

6. I observed during the examination of Mr. Kroeker on January 26, 2021 that counsel for British Columbia asked Mr. Kroeker about a spreadsheet, marked as Exhibit 494, which appeared to include extracts from five BCLC incident reports that were the subject of COMM-8669. I understood from the examination that counsel for British Columbia was suggesting to Mr. Kroeker that the spreadsheet included incidents where a known banned cash facilitator was observed conducting a cash delivery in real time.
7. Following the conclusion of Mr. Kroeker's examination, I conducted a further review of all of the incidents described in the COMM-8669 report in order to determine whether any of the incidents appeared to involve the live monitoring and identification of a banned cash facilitators making a cash delivery to a casino patron. In conducting this review, I confirmed that with one possible exception (incident IN20150008232, described below), none of the 45 incidents appeared to involve an identified banned cash facilitator being live monitored during a cash delivery.
8. Following the conclusion of Mr. Kroeker's examination I also obtained and reviewed a copy of Exhibit 494, a document I had not previously reviewed.
9. Exhibit 494 includes excerpts from 5 BCLC incident reports for incidents that were included in the COMM-8669 report. The complete incident reports for these incidents are attached as follows:
  - a. Exhibit "1" is IN20150008232 [BCLC0016905];
  - b. Exhibit "2" is IN20150013008 [BCLC0016906];
  - c. Exhibit "3" is IN20150017636 [BCLC0016907];

- d. Exhibit "4" is IN20150020601 [BCLC0016908]; and
  - e. Exhibit "5" is IN20150025204 [BCLC0016909].
10. With respect to IN20150008232, reading the entire incident report together, it appears that the provincially banned cash facilitator was identified and monitored conducting a cash delivery in real time. In light of this, I acknowledge that my evidence provided on November 10, 2020, in which I stated that "in not one instance out of 45 was that information available and done in real time", may have been in error with respect to this particular incident.
  11. With respect to IN20150017636 and IN20150020601, although it appears that a cash delivery was observed in real time by a vehicle associated to a banned cash facilitator, in neither case was the driver of the vehicle making the delivery identified, either in real time or upon subsequent review.
  12. With respect to IN20150013008 and IN20150025204, in neither of these incidents was any cash delivery observed in real time:
    - a. In IN20150013008, there are two separate incidents described in the incident report. The first, involving a cash delivery, does not appear to have been live monitored. The second, which is excerpted in Exhibit 494 and appears to have been live monitored, does not include any observation of a cash delivery, nor is it followed by any cash buy-in by the patron. Rather, the patron was observed returning to the casino and receiving chips from a prior buy-in;
    - b. Similarly, in IN20150025204, there are two separate incidents described in the report. The first, involving a cash delivery, does not appear to have been live monitored. The second, which is excerpted in Exhibit 494 and appears to have been live monitored, does not observe any cash delivery by a banned cash facilitator or associate of a banned cash facilitator. Rather, the incident involves a well-known VIP patron dropping off another well-known VIP patron at the casino, which was captured in real time. There is no indication in the report that any exchange of cash or chips occurred as between these patrons.

13. In summary, it appears that in only 1 of the 5 incidents excerpted in Exhibit 494 was a banned cash facilitator identified and observed in real time conducting a cash delivery.
14. When swearing this affidavit, I was not physically present before the commissioner, but was linked with the commissioner utilizing video technology and following the process described in the Notice to the Profession, the Public and the Media, dated March 27, 2020.

SWORN BEFORE ME at via )  
videoconference with affiant in Abbotsford, )  
British Columbia and the Commissioner in )  
Vancouver, British Columbia, on )  
11/02/2021. )

  
\_\_\_\_\_  
A commissioner for taking affidavits for  
British Columbia )

  
\_\_\_\_\_  
DARYL TOTTENHAM

**DIANA SEPULVEDA**  
*Barrister and Solicitor*  
**Hunter Litigation Chambers**  
**Suite 2100 - 1040 West Georgia Street**  
**Vancouver, BC V6E 4H1**  
**Telephone: 604-891-2415**



THIS IS EXHIBIT "1" TO THE  
AFFIDAVIT OF DARYL TOTTENHAM  
SWORN BEFORE ME VIA  
VIDEOCONFERENCE WITH THE AFFIANT  
IN ABBOTSFORD, BC AND THE  
COMMISSIONER IN VANCOUVER, BC  
THIS 11<sup>th</sup> DAY OF FEBRUARY, 2021.



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

Daryl

5

Incident File Full Report

[Incident File #IN20150008232](#)

<b>Data/Time Occurred:</b>	2/14/2015 1:52 PM	<b>Record Creation Details</b>	
<b>Day of Week Occurred:</b>	Saturday	<b>Department:</b>	Surveillance
<b>Date/Time Created:</b>	2/14/2015 2:33 PM	<b>Owner:</b>	ddogra
<b>Date/Time Closed:</b>		<b>Operator ID:</b>	ddogra
<b>Closed By:</b>		<b>Operator Name:</b>	
		<b>Personnel ID:</b>	
		<b>Card Number:</b>	
		<b>Job Position:</b>	
		<b>Secondary Operator:</b>	

**Location of Incident:**

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

**Details of Incident:**

<b>Daily Log #:</b>	DL20150149695
<b>Type:</b>	Gaming
<b>Specific:</b>	Unusual Financial Transaction
<b>Category:</b>	Redacted - FINTRAC
<b>Incident Status:</b>	Closed
<b>Synopsis:</b>	Cash counter used for a buy in of \$ 300 K in \$ 20 bills CD 19 SID 100893 going to MDB 73 PTZ 3400 M 405.

**Checklist:**

	15000 X \$ 20 bills = \$ 300,000
	- Section 86 Form
	Redacted - FINTRAC

**Narrative:**

Created On	Created By	Modified On	Modified By
2/14/2015 2:34 PM	ddogra		
Cash counter used for a buy in of \$ 300 K in \$ 20 bills CD 19 SID 100893 going to MDB 73 PTZ 3400 M 405.			
15000 X \$ 20 bills = \$ 300,000			

**Executive Brief:**

Reporting Party:

Supervisor:

6

Incident File Full Report

Incident File #IN20150008232

Participants Involved:

Personnel

Full Name:	DOGRA, Deepak	Property:	River Rock (GCC)
Role:	Documenter	Department:	Surveillance
Full Name:	BEEKSMA, Steve	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC

Subject

Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Other		
Full Name:	[REDACTED]	Company:	Gold Bay Construction Group
Role:	Patron		

Supplemental Entries:

SP20150022794 Attached by bcastil on Feb 14, 2015 14:34

Description At approximately 13:15hrs. on February 14, 2015, Surveillance was Live Monitoring [REDACTED] (SID: 100893). It appeared that he had lost all his Chips and was observed using his Phone. He was monitored as he exited Salon Prive and waited on the Resort 3rd Floor.

At approximately 13:35hrs., he proceeded down to the Resort Valet Area and continued to wait. At 13:46hrs., a white Toyota Sienna with BCLP: 603 MMK. Paul JIN (SID: 118418) exited the vehicle and retrieved a black luggage from the back of the vehicle. The luggage was then handed over to [REDACTED]

Paul JIN then reentered the vehicle and drove off-site. [REDACTED] proceeded back to Salon Prive.

At 13:47hrs. [REDACTED] presented Cash on CD19, taken out from the black luggage. Cash Count started shortly. The Count was separated into 3 Parts. The first part finished at 13:57hrs. - 5,000 x \$20 for \$100K. The Slip was taken to MDB73.

At 14:00hrs., [REDACTED] received Chips at MDB73 - 20 x 5K. He started gaming and was observed wagering significantly.

The second part of the Count finished at 14:17hrs. - 5,000 x \$20 for another \$100K. The second Slip was taken to MDB73 when [REDACTED] received another 20 x 5K.

The third part of the Count finished at 14:32hrs. - 5,000 x \$20 for another \$100K. The third Slip was taken to MDB73 when [REDACTED] received 20 x 5K.

Total buy-in of \$300K in \$20's - (15,000 x \$20)

Form 86 sent.

Reporting Party:

Supervisor:

*DAH*

Incident File Full Report

Incident File #IN20150008232

SP20150022794 Attached by bcastil on Feb 14, 2015 14:34

SP2015002279

4 - Continued-

Footage saved at:  
M:February 2015Week 2/SFT/

Bench CASTIL  
Surveillance Supervisor  
#61729

SP20150023871 Attached by sbeeksm on Feb 16, 2015 12:19

Description On the evening of 2015-FEB-14 a male casino patron identified as [REDACTED] produced \$300K (all in CDN \$20 bills) for play in River Rocks VIP room.

[REDACTED] had the cash delivered to him by a POI/Banned individual visually identified as JIN, Paul King (DOB 1967-DEC-10). JIN arrived on site operating a late model Toyota Sienna van (white, with BCLP 603MMK).

[REDACTED] approached the van and acquired a large gym bag (on wheels) from JIN who removed it from the back hatch of the van.

This vehicle has been involved in numerous other recent incidents of a similar nature.

BCLC previously confirmed RO information for this vehicle as follows:

Leased by 0820490 B.C. Ltd.  
The associated POD# [REDACTED]  
Chadwick Sydney Martin BELLWOD (m)  
DOB: [REDACTED]

On 2015-FEB-16 incident footage was reviewed. The footage supports what has been documented in this report.

Incident details:

Circumstances begin on 2015-FEB-14 at approx 1315hrs with [REDACTED] seemingly losing the balance of his chips in the casinos high limit room. He no cash buy in leading up to this suggesting he had chips from a previous visit or acquired chips from an unconfirmed source. Surveillance reports he was observed using his cell phone an eventually exited to the resorts driveway at approx 1335hrs where he waited.

-At approx 1344hrs the above described Toyota van arrives in the driveway and comes to a stop just before the entrance (pulling over to the side).

[REDACTED] approaches the vehicle and a male resembling JIN exited the drivers seat and accessed the back hatch. Surveillance was live monitoring at this point and both vehicle license plate and clear face shots of JIN were acquired.

JIN removes a large black gym bag from the back of the vehicle and sets it on the sidewalk for [REDACTED] who takes possession of it here [REDACTED] and JIN engage in brief conversation as [REDACTED] walks away wheeling the bag toward the hotel lobby.

Reporting Party: [REDACTED]

Supervisor: [REDACTED]



JIN returned to the van which departed the site at approx 1345hrs (it appeared JIN was the sole occupant).

-At approx 1347hrs [redacted] entered the casinos VIP Salon (from the hotel lobby side) and proceeded directly into the Salons private cashier room. He leaves the bag on the floor in the middle of the room as he takes a moment to figure out how to access it. Once he does he unloads approx 30 bricks of CDN \$20 bills (approx \$10K per brick) onto the counter for verification. Cashiers begin to count the money and [redacted] exits to the gaming floor to await his chips (leaving the bag behind).

The cash (later verified as totalling \$300K) is split into 3, \$100K transactions to expedite [redacted] receipt of chips.

-At approx 1358hrs [redacted] received the chips for the 1st \$100K on Midi-Baccarat table 73 in the newly renovated "Premier" section of the VIP Salon.

He bets the entire \$100K on the next hand which is lost then observes hands being dealt without bets while he waits for the next \$100K.

-At approx 1417hrs [redacted] receives the next \$100K in chips (on the same table). He bets all but \$5K on the outcome of the next hand which is won (essentially doubling his money [redacted] continues to gamble very aggressively wagering up to the table maximum of \$100K per hand.

-At approx 1432hrs [redacted] received the remaining \$100K (on the same table) completing his buy in transactions for the date.

Total cash was \$300K, 15,000X\$20 bills.

No further irregularities were observed on review or reported by the casino as it relates to [redacted] activity in the casino this date. He did not receiving any disbursements and according to table tracking docs attached to his LCT he lost the full \$300K by approx 2245hrs.

Conclusion:

Although [redacted] did appear to be gambling legitimately this date and has a history of doing so, there are elements of this incident that are unusual and add a level of suspiciousness to the circumstances.

Review of [redacted] casino history shows that transactions of this amount are not out of the ordinary for him however until approx 3-4 weeks ago he hadn't generated a casino record in nearly 2 years.

Redacted - FINTRAC  
Redacted - FINTRAC

Some of the suspicion relating to this incident is surrounding the cash itself and its possible questionable origins.

Substantial volumes of cash, particularly in smaller denominations, presented in bricks bound by elastics are a casino indicator of an unusual transaction and may suggest the cash could be of questionable origins.

According to casino records [redacted] had provided his occupation as a "Financial Manager". It's possible his specific source of wealth may have been lost in translation but "Financial Manager" does not provide any insight as to where [redacted] may have acquired such a large volume of cash.

The fact JIN was involved in the delivery of the \$300K [redacted] adds another level of suspicion and further suggests that [redacted] buy in cash comes from questionable origins.

Reporting Party:

Supervisor:

Att

SP20150023871 Attached by sbeeksma on Feb 16, 2015 12:19

SP2015002387  
1 - Continued-

**Redacted - FINTRAC**

██████ is on BCLC's list of High Risk Patron Profiles, under watch in the casino reporting system and will continue to be monitored when attending BC Casinos with reports generated and escalated as required.

S.BEEKSMA  
BCLC  
Casino Investigations

SP20150023885 Attached by sbeeksma on Feb 16, 2015 12:26

Description

**Redacted - FINTRAC**

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

S.BEEKSMA  
BCLC  
Casino Investigations

Reporting Party:

Supervisor:



10

Incident File Full Report

[Incident File #IN20150008232](#)

List of Attached Forms:

Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:

Printed: 1/27/2021 5:30 PM

Page 6 / 6

BCLC0016905.06



THIS IS EXHIBIT "2" TO THE  
AFFIDAVIT OF **DARYL TOTTENHAM**  
SWORN BEFORE ME VIA  
VIDEOCONFERENCE WITH THE AFFIANT  
IN ABBOTSFORD, BC AND THE  
COMMISSIONER IN VANCOUVER, BC  
THIS 11<sup>th</sup> DAY OF FEBRUARY, 2021.



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



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Incident File Full Report

[Incident File #IN20150013008](#)

Incident File Full Report		Record Creation Details	
Date/Time Occurred:	3/10/2015 5:04 PM	Department:	Surveillance
Day of Week Occurred:	Tuesday	Owner:	sroddick
Date/Time Created:	3/10/2015 5:15 PM	Operator ID:	sroddick
Date/Time Closed:		Operator Name:	
Closed By:		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 #:	DL20150232154
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Redacted - FINTRAC
Incident Status:	Closed
Synopsis:	SID 90767. B/I \$ 100K @ CD 19. To MDB 28. M 414
Checklist:	- Section B5 Form

Narrative:	Redacted - FINTRAC			
	Created On	Created By	Modified On	Modified By
	3/10/2015 5:15 PM	sroddick		
	SID 90767 - \$ 100K B/I (2970 x \$ 20 and 406 x \$ 100 bills) to MDB 28 (CD 19).			
	Created On	Created By	Modified On	Modified By
	4/15/2015 10:39 AM	administrator		
	Redacted - FINTRAC			

Executive Brief:

Reporting Party:

Supervisor:

BCLC0016906  
*[Handwritten Signature]*

Incident File Full Report

Incident File #IN20150013008

Participants Involved:

Personnel

Full Name:	WIEBE, Michael	Property:	River Rock (GCC)
Role:	Documentar	Department:	Surveillance
Full Name:	CLARK, Holly Jana	Property:	River Rock (GCC)
Role:	Documentar	Department:	Surveillance
Full Name:	WAKELAND, Jerome	Property:	Vancouver (BCLC)
Role:	Reporter	Department:	BCLC

Subject

Full Name:	[REDACTED]	Company:	Freelance at Home
Role:	Other		
Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Other		
Full Name:	[REDACTED]	Company:	Bo Hua Industry Steel Company
Role:	Patron		
Full Name:	[REDACTED]	Company:	Shan Yang Bing Wei Shoe Store
Role:	Patron		

Supplemental Entries:

SP20150036055 Attached by mhwiebe on Mar 10, 2015 17:55

Description At approximately 1700 Surveillance was made aware of a large buy in small bills by SID 90767 [REDACTED] The buy in consisted of 2970 x \$20.00 (\$59400.00) and 406 x \$100.00 (\$40600.00) totaling \$100,000.00 for play on MDB 28.

A review was done and the following determined;  
 [REDACTED] meets a white Bentley Coupe outside the south tower lobby and appears to remove a bag from the rear of the vehicle at 16:57. After retrieving the bag [REDACTED] proceed directly to the Salon cage private room arriving at 17:00 [REDACTED] count was complete at 17:13 and he received his chips on MDB 28 @ 1718. (20 x 5k). Significant play is noted.

At approximately 1812 Surveillance was made aware of a 2nd buy in [REDACTED] for \$200,000.00 (1000 x \$50, 500 x \$100, and 5000 x \$20.00) for play on MDB 28 a review was done and the following determined;  
 [REDACTED] arrives on site in VIP parking in the company of SID 8495 [REDACTED] at 18:10 [REDACTED] and [REDACTED] proceed directly to the Salon and [REDACTED] to the private cage arriving at 1812 [REDACTED] 1st completa at 1821 and he received his chips on MDB 28 at 1823 (20 x 5k) [REDACTED] second count was complete at 1831 and he received his chips on MDB 28 at 1835 (20 x 5k). Significant play was noted.

Footage saved to Y:\SDC\March2015\Week2\UFT\15-13008 and M:\RRSurv\March2015\Week2\UFT\15-13008

Reporting Party:

Supervisor:

13

Incident File Full Report

Incident File #IN20150013008

SP20150036055 Attached by mhwiebe on Mar 10, 2015 17:55

SP2015003605  
5 - Continued-

WIEBE  
24824

SP20150036238 Attached by hclark on Mar 11, 2015 01:37

Description Surveillance was informed of a \$200,000 buy in mostly in \$20 bills for SID #90767 [REDACTED] going to MDB28. A review was conducted and showed the following:

At approx. 2339 [REDACTED] uses his phone while gaming in the Phoenix room.

At approx. 2354 a white sedan that appeared to be the white Bentley driven by BCLC barred patron SID #118418 JIN Paul drives up River Road and stops just before the side walk across from the south hotel.

At approx. 2358 [REDACTED] exits the east lobby, meets up with the white sedan, and comes back into the Resort carrying a "Browns" bag [REDACTED] then heads directly to the Salon Prive cage where he removes two plastic bags containing bundles of \$20 bills from the browns bag for the buy in. The count was done in two parts. Bill breakdown for the first \$100,000 was 5000 x \$20 for a total of \$100,000. Bill breakdown for the second \$100,000 was 4 x \$5 bills, 6 x \$10 bills, 4803 x \$20 bills, 50 x \$50 bills, and 14 x \$100 bills for a total of \$100,000.

At approx. 0100 surveillance received an iLPR alert for JIN in the south parkade. Live monitoring commenced and observed the following:

At approx. 0103 the white Bentley LP #AD3336 (it appears to be JIN driving) drives up to the 4th floor VIP parking area and SID #85444 [REDACTED] approaches the car and talks to the driver.

At approx. 0108 [REDACTED] approaches and enters the vehicle. The Bentley the drives into a spot at the end of the floor, parks, and [REDACTED] exits the vehicle [REDACTED] then re-enters the casino and the Bentley drives off site. It could not be determined if [REDACTED] gave any chips to or received any chips from JIN.

At approx. 0234 [REDACTED] receives 40 x \$5000 chips, 1 x \$25 chip and 3 x \$5 chips for both portions of his buy in on MDB28 [REDACTED] then moves to MDB27 and continues gaming there. Updated form 86 sent.

saved to Y/M/MARCH/15: 15-13008  
CLARK Holly  
#29855

SP20150036438 Attached by jewakoland on Mar 11, 2015 12:48

Description **Redacted - FINTRAC**

The incidents noted by site staff are supported by reviewed reports and video footage.

On March 10, 2015 [REDACTED] conducted several gaming sessions at the River Rock casino with suspicious buy-ins totalling \$500,040. A vehicle registered to BCLC Barred Patron Paul King JIN delivered \$300,000 to [REDACTED] JIN is barred for 5 years for loan sharking activity.

Reporting Party:

Supervisor:

*[Handwritten signature]*

14

SP20150036438 Attached by jwakeland on Mar 11, 2015 12:48

SP2015003643  
8 - Continued-

**Redacted - FINTRAC**

It is unlikely that this amount of small denomination bills was obtained from a recognized banking institution.

The funds for \$300,000 worth of the buy-ins were delivered to the casino by a white Bentley Sedan outside of regular banking hours. The vehicle is registered to Paul King JIN, a BCLC barred patron for loan sharking activity.

The mix of small denomination bills is not consistent with [REDACTED]'s provided occupation of Steel Company Owner.

The passing of \$150,000 worth of chips from [REDACTED] to [REDACTED] appears to be an incident of shared play. In a related incident at the River Rock Casino [REDACTED] passed approximately \$90,000 worth of chips to [REDACTED] on March 8, 2015.

**Redacted - FINTRAC** Vancouver IPOC and local GPB Investigators

J. WAKELAND  
BCLC Investigator

SP20150036948 Attached by jwakeland on Mar 12, 2015 13:06

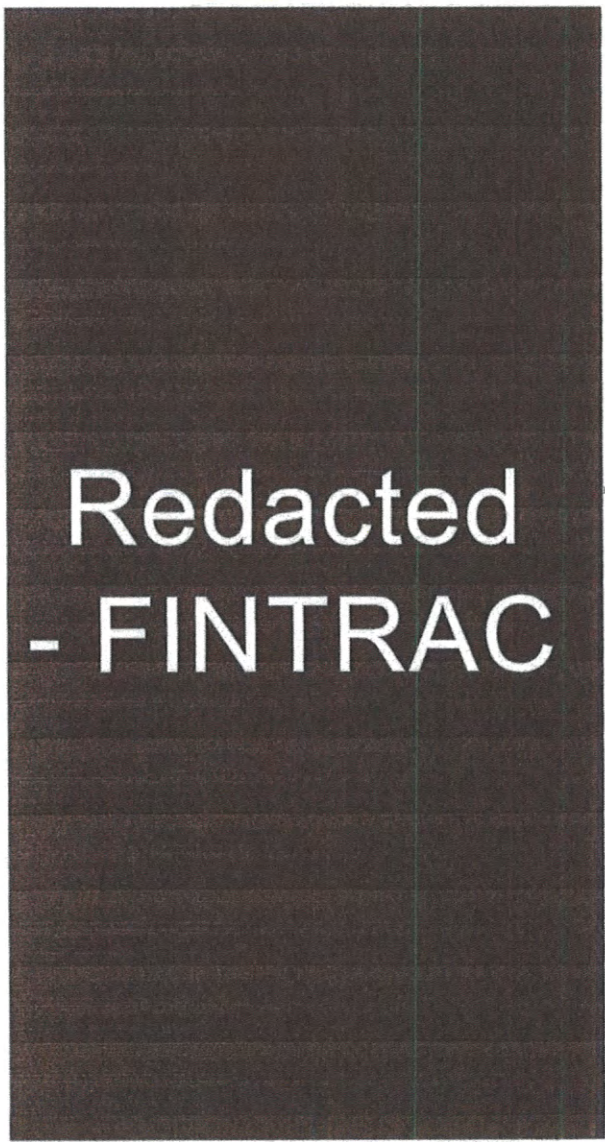
Description

**Redacted - FINTRAC**

Reporting Party:

Supervisor:

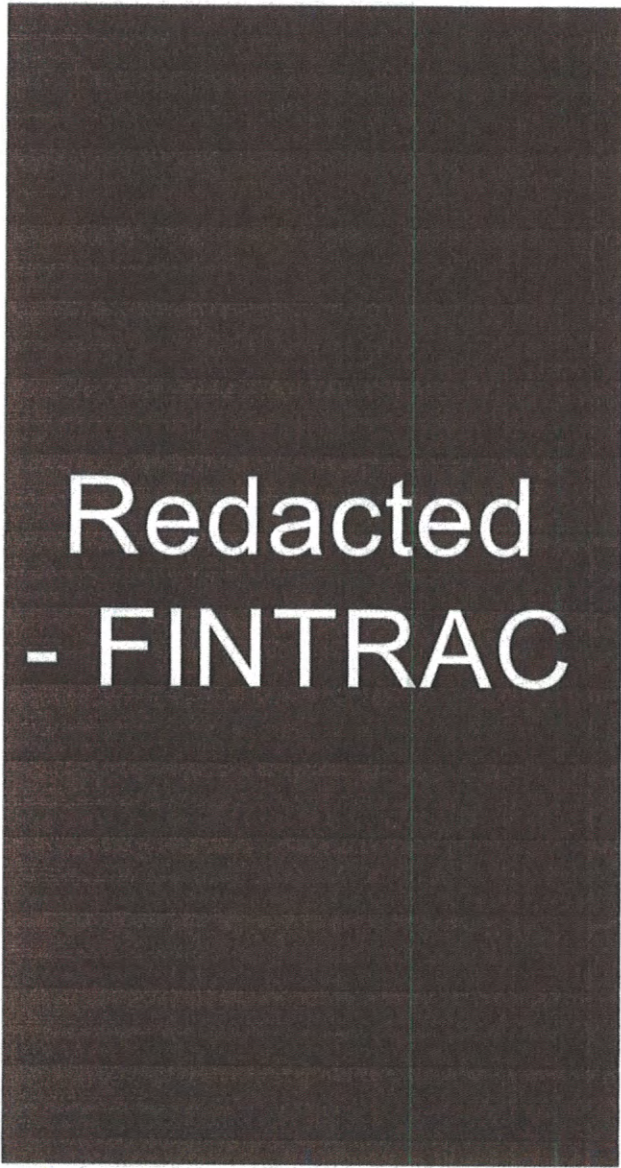




Reporting Party:

Supervisor:

16



Reporting Party:

Supervisor:

A handwritten signature in black ink, appearing to be "AKK", is located at the bottom right of the page.



J. WAKELAND  
BCLC Casino Security Investigator

Reporting Party:

Supervisor:

A handwritten signature in black ink, appearing to be "JAWA", is located below the BCLC0016906.07 text.

18

Incident File Full Report

[Incident File #IN20150013008](#)

List of Attached Forms:

Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:

Printed: 1/27/2021 5:30 PM

Page 8 / 8

BCLC0016906.08

*Att*

THIS IS EXHIBIT "3" TO THE  
AFFIDAVIT OF DARYL TOTTENHAM  
SWORN BEFORE ME VIA  
VIDEOCONFERENCE WITH THE AFFIANT  
IN ABBOTSFORD, BC AND THE  
COMMISSIONER IN VANCOUVER, BC  
THIS 11<sup>th</sup> DAY OF FEBRUARY, 2021.

A handwritten signature in blue ink, appearing to read "Dnsit", written over a horizontal line.

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

19

Incident File Full Report

Incident File #IN20150017636

		<u>Record Creation Details</u>	
Date/Time Occurred:	4/ 3/2015 4:50 PM	Department:	Surveillance
Day of Week Occurred:	Friday	Owner:	Ivan
Date/Time Created:	4/ 3/2015 4:50 PM	Operator ID:	Ivan
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

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Location of Incident:

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Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	MDB 24

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Details of Incident:

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Daily Log #:	DL20150314131								
Type:	Gaming								
Specific:	Unusual Financial Transaction								
Category:	Redacted - FINTRAC								
Incident Status:	Closed								
Synopsis:	Large buy in with small bills SID 90767								
Checklist:	- Section 86 Form								
	Redacted - FINTRAC								
Narrative:	<table border="0"> <tr> <td>Created On</td> <td>Created By</td> <td>Modified On</td> <td>Modified By</td> </tr> <tr> <td>4/ 3/2015 4:51 PM</td> <td>Ivan</td> <td></td> <td></td> </tr> </table> <p>Redacted - SID 90767 B/I 70K with 1000 x \$5, 1800 x \$10, 42 x \$50 &amp; 449 x \$100.</p>	Created On	Created By	Modified On	Modified By	4/ 3/2015 4:51 PM	Ivan		
Created On	Created By	Modified On	Modified By						
4/ 3/2015 4:51 PM	Ivan								

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150017636

Participants Involved:

Personnel

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

Subject

Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Accused		
Full Name:	[REDACTED]	Company:	
Role:	Accused		
Full Name:	[REDACTED]	Company:	Bo Hua Industry Steel Company
Role:	Patron		
Full Name:	[REDACTED]	Company:	Bosswell Consulting Co Ltd.
Role:	Patron		

Supplemental Entries:

SP20150049139 Attached by lwan on Apr 3, 2015 17:00

Description Surveillance was conducting a live monitoring of [REDACTED] at 1543 hrs when he entered The Hotel. He appears to be waiting for somebody/something and is seen accessing his phone few times during his stay. At 1622 hrs, a white Bentley bearing L/P AD333G, associated with JIN Paul SID 118418, pulls into The Hotel driveway driven by a male later identified as LNU SID 172925. [REDACTED] exits The Hotel and gets in the right front passenger seat. Vehicle is driven forward and stops outside Sea Harbor Restaurant. SID 172925 and [REDACTED] both exit the vehicle and SID 172925 removes a light colored plastic bag from the trunk and passes it to [REDACTED]. Vehicle is then driven off site and [REDACTED] heads to The resort with the bag. [REDACTED] meets up with [REDACTED] SID 16096 on 3/F west tower and both enter Salon. [REDACTED] heads to CD 19 private window and removes a white plastic bag from the bag and unwraps few bricks of bills wrapped by newspaper. He then removes more bills from another yellow plastic bag that was from the light colored bag. The breakdown was 1000 x \$5's; 1800 x \$10's; 42 x \$50's & 449 x \$100's totaling 70K. At 1649 hrs [REDACTED] receives 12 x 5K & 10 x 1K in chips on MDB 24 and starts to put substantial amount at risk.

Form 86 sent.

Footage saved to M & Y/APR/week 1/UFT/15-17636

L WAN  
25549

SP20150052270 Attached by beeksma on Apr 9, 2015 14:41

Description On the afternoon of 2015-APR-03 a male patron identified as [REDACTED] produced a total of \$70K in CDN currency for buying in at River Rocks VIP Salon (majority in small denomination bills).

Reporting Party:

Supervisor:

21

Incident File Full Report

Incident File #IN20150017636

SP20150052270 Attached by sbeeksmia on Apr 9, 2015 14:41

SP2015005227

0 - Continued-

█████ appeared to have had the money delivered to him by the driver of a vehicle described as a white Bentley sedan with BCLP AD3 33G driven by an unknown Asian male. This vehicle has been previously linked to a banned POJ identified as JIN, Paul King (DOB 1967-DEC-10). On this date it is driven by a heavy set Asian male that has been seen driving 2 vehicles associated to JIN on numerous incidents, he remains unidentified.

On 2015-APR-09 incident footage was reviewed. The footage supports what has been documented in this report.

Incident details:

Footage begins on 2015-APR-03 at approx 1543hrs with █████ entering the lobby of the South hotel and taking a seat here. While seated here waiting █████ is seen using his cell phone constantly.

-At approx 1608hrs █████ stands up and is seen looking out to the driveway then sitting back down.

-At approx 1622hrs █████ gets up and exits to the driveway. At the same time the above described Bentley enters the one-way driveway and stops to let █████ in to the passenger seat. The vehicle pulls forward and to the side in front of the Sea Harbour restaurant and both the driver and █████ exit meeting at the back of the vehicle. The unknown male driver accesses the vehicle trunk where he acquires a large off-white coloured plastic bag that he hands to █████ crosses River road to the resort side as the unknown male returns to the drivers seat and departs the site.

-At approx 1623hrs █████ enters the resorts hotel lobby and makes his way up to the casinos VIP Salons. At some point on his way he met with another male identified as █████ and both enter the VIP Salon together. █████ had no clear involvement in this incident other than simply entering the casino with █████.

-At approx 1625hrs █████ (and █████) entered the casinos VIP Salon and █████ proceeds directly into the private cashier room. In here █████ removed a white plastic bag from the off-white one and from it dumped out a bricks of cash wrapped in newspaper. He then removed a yellow bag from which he dumped out more cash (all cash was bound by elastic bands). Cashiers begin to verify the cash and █████ exits to the gaming floor to await his chips.

-By approx 1644hrs cashiers have completed counting █████'s money which totalled \$70K (1000X\$5, 1800X\$10, 42X\$50 and 449X\$100 bills).

█████ receives the chips on table 24 completing the buy in transaction.

No further irregularities were reported by the site or observed on review.

█████ did not receive any disbursements this date.

Conclusion:

Although █████ did appear to be gambling legitimately this date the circumstances detailed above suggest there are indicators of unusual/suspicious activity.

According to casino record █████ has previously provided his occupation as a "Mining Investor". The writer cannot confirm but it seems unlikely █████'s business would deal in substantial volumes of smaller denomination cash. Also cash bundled in bricks bound by elastic bands

Reporting Party:

Supervisor:

Printed: 1/27/2021 5:29 PM

Page 3 / 5

BCLC0016907.03

D MKG



SP20150052270 Attached by sbeeksma on Apr 9, 2015 14:41

SP2015005227  
0 - Continued-

suggests the money did not come from a recognized financial institution.

The cash deliveries and the possibility that JIN and/or associates were adds another layer of suspicion and brings the source of funds even more into question.

**Redacted - FINTRAC**

is on BCLC's list of High Risk Profile Patrons (HRPP) and will continue to be monitored when attending BC Casinos with reports generated and escalated as required.

S.BEEKSMA  
BCLC  
Casino Investigations

SP20150052271 Attached by sbeeksma on Apr 9, 2015 14:42

Description

**Redacted - FINTRAC**

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

S.BEEKSMA  
BCLC  
Casino Investigations

Reporting Party:

Supervisor:

List of Attached Forms:

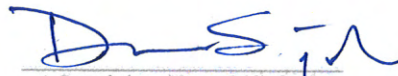
Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:



THIS IS EXHIBIT "4" TO THE  
AFFIDAVIT OF DARYL TOTTENHAM  
SWORN BEFORE ME VIA  
VIDEOCONFERENCE WITH THE AFFIANT  
IN ABBOTSFORD, BC AND THE  
COMMISSIONER IN VANCOUVER, BC  
THIS 11<sup>th</sup> DAY OF FEBRUARY, 2021.

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



24

Incident File Full Report

[Incident File #IN20150020601](#)

		<b>Record Creation Details</b>	
Date/Time Occurred:	4/18/2015 11:43 PM	Department:	Surveillance
Day of Week Occurred:	Saturday	Owner:	jhussey
Date/Time Created:	4/18/2015 11:45 PM	Operator ID:	tmarch
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	stansun

Location of Incident

Property:	Parq Casino
Location:	The Salons
Sublocation:	CD 09

Details of Incident

Daily Log #:	DL20150366150
Reference:	M2
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Redacted - FINTRAC
Incident Status:	Closed
Synopsis:	SID#26303 [Redacted] bought in for \$450,000 (\$296,000 in \$20 bills)
Checklist:	- Section 86 Form
	Redacted - FINTRAC
Narrative:	
	Created On      Created By      Modified On      Modified By
	4/18/2015 11:46 PM      tmarch
	SID#26303 [Redacted] bought in for \$450,000 (\$296,000 in \$20 bills)

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150020601

Participants Involved:

Personnel

Full Name:	MARCH, Tim (Timothy)	Property:	Parq Casino
Role:	Documenter	Department:	Surveillance
Full Name:	NORGAARD, Brandon	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	SUN, Stanley (Shan)	Property:	Parq Casino
Role:	Info From	Department:	Tables
Police Contacted:	Taken From Scene:	Police Contacted Result :	
Full Name:	JIAO, Amanda	Property:	Parq Casino
Role:	Notified	Department:	Surveillance
Full Name:	HANSON, Janet	Property:	Parq Casino
Role:	Reporter	Department:	Cage
<b>Subject</b>			
Full Name:	[REDACTED]	Company:	BeijingChengdangXinrui Const Co
Role:	Accused		
Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Accused		

Supplemental Entries:

SP20150057342 Attached by tmarch on Apr 19, 2015 00:16

Description On the above date at approximately 22:29 surveillance received an iLPR alert stating that BCLC prohibited SID#118418 Paul JIN (prohibited until 2017-NOV-05) was on site. Surveillance immediately attained a visual and noticed SID#2630: [REDACTED] exiting JIN's vehicle. At approximately 22:30 cage supervisor Janet HANSEN notified surveillance that [REDACTED] had dropped off a large quantity of \$20 bills at CD9 for a large table buy in. At approximately 22:42 [REDACTED] received \$200,000 in chips at MDB19. At approximately 22:38 [REDACTED] received another \$250,000 at MDB19.

[REDACTED]'s total buy-in was \$450,000  
 400x\$10 = \$4,000  
 14,800x\$20 = \$296,000  
 1,500x\$100 = \$150,000

20:50:13 [REDACTED] loses last hand off of buy-in occurring earlier in the day  
 20:50:40 exits The Salons, using his phone  
 22:19:52 exits The Salons and walks toward the Plaza of Nations/Taxi Loop

Reporting Party: [REDACTED]

Supervisor: [REDACTED]

*ADT*

26

Incident File Full Report

Incident File #IN20150020601

SP20150057342 Attached by tmarch on Apr 19, 2015 00:16

SP2015005734  
2 - Continued-

22:27:58 JIN drives on site via Pacific Boulevard in a white Bentley  
22:28:42 [REDACTED] exits JIN's car, seen carrying two bags  
22:29:10 [REDACTED] enters The Salons with two bags, money visible in bags  
22:29:30 [REDACTED] arrives at CD9 and places money on the counter  
  
22:30:29 JIN off site via Pacific Boulevard, did not stop on his way to the exit  
  
22:42:30 [REDACTED] receives \$200,000 in chips at MDB19  
23:38:20 [REDACTED] receives \$250,000 in chips at MDB19, immediately places the chips in his bag

Section 86 sent to GPEB

Followed on MON2/DVR30, MON11/DVR23, CAM1, 573, 576, 575 ,16, 307  
Footage saved to 'Suspicious Financial Transactions' folder under the incident number

Tim MARCH  
73729

SP20150057416 Attached by stansun on Apr 19, 2015 03:00

Description On Gaming date April 18, 2015, at about 22:30 [REDACTED] (26303) dropped off \$450K cash at Salon Cage for a LTBI, which contained:  
  
400x\$10 = \$4,000  
14,800x\$20 = \$296,000  
1,500x\$100 = \$150,000

\$450K was conducted by two LTBI slips at MDB19, \$200K and \$250K.

Stanley SUN  
61037

SP20150058151 Attached by tomlante on Apr 20, 2015 11:46

Description 2015-April-20 A review of this report was completed; Footage to be reviewed. Activity documented does appear to be unusual, [REDACTED - FINTRAC]

T. PLANTE BCLC  
Casino Investigations

SP20150058219 Attached by brnorgaard on Apr 20, 2015 13:59

Description April 20, 2015 - I have reviewed available footage with SU/S TEHRANI. Footage supports what the site has reported.

Observed is at 2050 hrs [REDACTED] is seen gaming and loses his initial bankroll of \$400,000 that he had bought in with at 1653 hrs earlier this date. Upon losing the last of his bankroll, [REDACTED] leaves the Salons and heads to the smoking area outside where he begins to use his cell phone.

Reporting Party:

Supervisor:

*[Handwritten signature]*

At 2219 hrs, [REDACTED] is seen leaving and walking towards the taxi loop area. Unfortunately, due to camera coverage limitations, it is unclear where [REDACTED] went.

At 2227 hrs, a white Bentley (BCLP: AD3 33G) arrives on site. This vehicle is registered to JIN, Paul King (SID: 118418) whom is currently BCLC Prohibited for activity consistent with loan sharking. As the driver never exits the vehicle, it is unclear if JIN is the driver or if it was one of his associates. The vehicle parks at the Valet loop, an [REDACTED] exits the passenger side carrying two bags (blue reusable bag/red paper shopping bag), both of which appear to be quite heavy from their contents.

[REDACTED] then proceeds into the Salons with the Bentley leaving site immediately after [REDACTED] exits.

[REDACTED] proceeds to the cash cage where he presents both bags for his buy in which totals

\$450,000, in mixed denomination bills as follows:

- \$400 x \$10 bills = \$4,000
- 14,800 x \$20 bills = \$296,000
- 1,500 x \$100 bills = \$150,000

Total = \$450,000

It is noted that the bills were bound with elastic bands and not arranged in a consistent fashion.

[REDACTED] then receives his chips in two separate installments as follows:

- \$200,000 at MDB 19 at 2242 hrs
- \$250,000 at MDB 19 at 2338 hrs

It is noted that upon receipt of the \$250,000 in chips [REDACTED] immediately places the entire amount into his shoulder bag.

At this time of writing [REDACTED] is still currently playing with chips from this buy in.

This incident is being deemed suspicious due to the large amount of small denomination bills (14,800 x \$20 bills/4,000 x \$10 bills) used to conduct the \$450,000 buy in. Furthermore, the bills were secured with elastic bands, nor were they organized in a consistent manner, which are indicators that the funds did not come from a recognized financial institution.

In addition [REDACTED] was dropped off by a vehicle registered to JIN just prior to his \$450,000 buy in, which calls into question the origin of the funds as JIN has a lengthy history of loan sharking activity.

Redacted - FINTRAC

Brandon Norgaard  
BCLC Casino Investigator  
215001

Reporting Party:

Supervisor:

*Jello*

28

SP20150058224 Attached by bnorgaard on Apr 20, 2015 14:09

Description

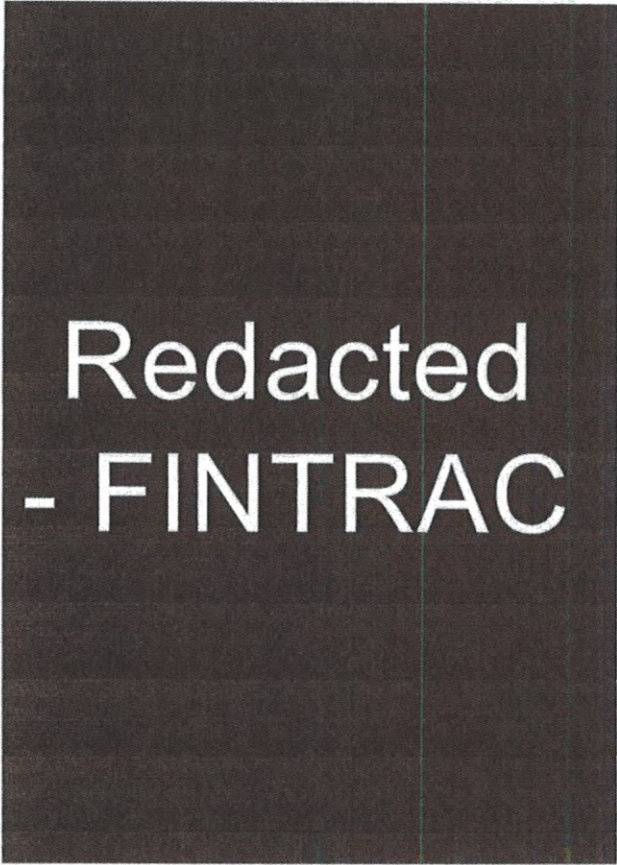


Reporting Party:

Supervisor:

*Handwritten initials*





Reporting Party:

Supervisor:

A handwritten signature in black ink is located below the page number.

List of Attached Forms:

Prefix	Form Name
A	Redacted - FINTRAC

Reporting Party:

Supervisor:

