COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Caterina (Cathy) Cuglietta, with a business address of 74 Seymour Street W, Kamloops, BC, V2C 1E2, AML Business Intelligence Analyst for British Columbia Lottery Corporation, MAKE OATH AND SAY THAT:

- 1. I am employed as an Anti-Money Laundering ("AML") Business Intelligence Analyst for 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 swear this affidavit further to my Affidavit No. 1 sworn in this Commission of Inquiry.
- 3. Attached as **Exhibit** "A" is a true copy of an excel spreadsheet I prepared for use in the Cullen Commission of Inquiry into Money Laundering in British Columbia, which summarizes BCLC's suspicious transaction reporting and large cash transaction ("LCT") reporting to the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC"). I prepared this spreadsheet under the direction and supervision of Ms. Bamra and with the assistance of Brad Rudnicki, AML Intelligence Specialist for BCLC, using data obtained from BCLC's internal databases.
- 4. Page 1 of Exhibit "A" provides a monthly breakdown of the total dollar value and total number of LCT Reports submitted by BCLC to FINTRAC for casino transactions for the period September 2009 to March 2020.
- 5. Page 2 of Exhibit "A" provides a monthly breakdown of the total dollar value and total number for all suspicious transaction reports ("STRs") submitted by BCLC to FINTRAC

for the period January 2014 to November 2020. Prior to 2014, STR data was saved by BCLC in a different manner, such that compiling monthly data breakdowns is technically possible but would require a very time-consuming and personnel-intensive manual review and count of records.

- 6. The data summarized at page 2 of Exhibit "A" includes STRs associated with land-based gaming facilities, as well as eGaming STRs and external request STRs, which are STRs that are filed by BCLC based on information received from law enforcement or identified through adverse media. External request STRs include the entirety of a patron's total historical dollar value of buy-ins, and do not relate to a single transaction. The STR data for April 2020 to November 2020, when land-based casinos and community gaming centres were closed due to the COVID-19 pandemic, is primarily attributable to eGaming and external request STRs. I am informed by Daryl Tottenham, Manager, AML Programs for BCLC, that some of the STR data for April 2020 to November 2020 is also attributable to some land-based gaming facility STRs that were filed as a result of BCLC conducting follow-up reviews of past transactions.
- 7. I make this Affidavit for use in the Cullen Commission of Inquiry into Money Laundering in British Columbia, and for no other purpose.

SWORN BEFORE ME at Kamloops,	
British Columbia, on MARCH 34, 2021.	

A commissioner for taking affidavits for

British Columbia

CATERINA (CATHY) CUGLIETTA

Robert Connolly
Senior Legal Counsel
British Columbia Lottery Corporation
74 W. Seymour St.
Kamloops, BC V2C 1E2

THIS IS **EXHIBIT "A"** TO THE AFFIDAVIT OF CATERINA (CATHY) CUGLIETTA SWORN BEFORE ME AT KAMLOOPS, BC THIS _____ DAY OF MARCH, 2021

A Commissioner/Notary Public for the Province of British Columbia

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LCT Dollar Value

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2008											_	
2009												
2010	\$22,312,778	\$31,814,575	\$21,305,230	\$28,919,921	\$28,593,737	\$22,752,170	\$29,464,861	\$28,756,916	\$29,513,717	\$36,666,005	\$31,216,580	\$30,943,990
2011	\$26,693,831	\$43,292,099	\$37,337,628	\$31,611,099	\$36,432,120	\$32,785,933	\$32,151,686	\$27,305,274	\$30,913,165	\$32,371,809	\$29,968,769	\$27,453,550
2012	\$42,813,315	\$53,120,247	\$40,429,075	\$28,747,720	\$30,128,087	\$37,968,110	\$44,234,608	\$40,872,326	\$28,587,604	\$38,250,822	\$48,234,322	\$59,031,419
2013	\$40,561,481	\$66,445,734	\$44,402,524	\$45,793,262	\$64,758,058	\$55,730,345	\$72,951,749	\$66,425,421	\$86,547,776	\$98,448,270	\$60,516,935	\$48,082,509
2014	\$76,178,502	\$123,108,206	\$95,022,480	\$101,633,025	\$122,985,035	\$106,683,141	\$77,493,195	\$122,228,143	\$89,858,361	\$107,353,084	\$83,267,500	\$78,792,871
2015	\$58,483,012	\$95,197,337	\$110,632,244	\$86,172,676	\$85,166,441	\$71,878,541	\$104,214,227	\$76,627,301	\$80,326,546	\$77,998,962	\$65,583,408	\$55,864,733
2016	\$57,072,335	\$76,493,140	\$83,021,277	\$64,151,582	\$84,821,753	\$71,091,438	\$92,586,445	\$46,132,224	\$44,144,673	\$44,913,487	\$36,845,032	\$38,347,268
2017	\$40,249,347	\$52,610,470	\$38,779,652	\$39,610,698	\$43,807,244	\$42,038,429	\$45,187,699	\$46,578,065	\$37,675,408	\$43,841,375	\$41,618,438	\$42,174,250
2018	\$18,350,874	\$14,716,449	\$17,011 <u>,</u> 015	\$15,092,370	\$15,322,118	\$15,253,545	\$12,588,873	\$15,125,016	\$13,381,839	\$14,332,913	\$11,893,507	\$10,767,620
2019	\$9,576,523	\$9,935,787	\$9,182,969	\$8,535,183	\$9,460,441	\$10,296,018	\$11,378,056	\$11,844,775	\$11,873,035	\$14,032,533	\$12,083,343	\$11,914,235
2020	\$11,137,935	\$13,805,345	\$6,220,450	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0

Sep	1047	18592930
Oct	1509	29765325
Nov	1243	21143625
Dec	1253	25549515

LCT Counts

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2008												
2009												
2010	1224	1563	1314	1386	1497	1409	1403	1530	1350	1766	1781	1753
2011	1400	1985	1526	1443	1595	1522	1489	1462	1582	1679	1721	1713
2012	2227	2125	1618	1517	1541	1817	1877	1659	1490	1860	1706	2088
2013	1882	2743	2228	2150	2288	2000	2387	2439	2576	2556	2137	2063
2014	2347	3488	2965	2785	2898	2917	2672	2986	2774	3359	2762	2767
2015	2442	3239	3124	2710	3226	2997	3597	3144	2601	3118	2813	2644
2016	2593	3405	3523	2929	3582	3447	3455	3177	3133	3128	2712	2512
2017	2888	3518	2735	2879	3116	3005	2886	3355	2776	3104	3188	3167
2018	1504	1100	1221	1093	1220	1167	1015	1187	1064	1131	913	885
2019	773	728	733	691	729	806	912	891	908	979	924	885
2020	851	931	493	0	0	0	0	0	0	0	0	0

STR Value

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2014	\$12,216,267	\$15,906,115	\$11,408,160	\$9,969,136	\$19,437,985	\$18,420,990	\$12,548,825	\$18,565,015	\$19,042,255	\$22,564,981	\$17,495,614	\$17,706,989
2015	\$13,100,125	\$23,734,974	\$19,462,764	\$16,123,855	\$21,201,775	\$13,701,465	\$27,893,150	\$14,038,545	\$10,535,970	\$10,585,181	\$6,209,039	\$7,255,010
2016	\$7,484,960	\$9,007,035	\$8,271,680	\$8,548,200	\$11,160,345	\$7,078,917	\$4,759,965	\$5,608,500	\$6,604,612	\$4,077,055	\$3,025,469	\$3,831,380
2017	\$3,533,455	\$6,073,770	\$3,435,960	\$4,601,050	\$4,226,343	\$3,374,650	\$5,393,630	\$4,304,290	\$3,030,605	\$2,826,520	\$1,828,050	\$2,672,140
2018	\$605,700	\$792,049	\$440,500	\$387,580	\$254,510	\$133,000	\$373,359	\$794,348	\$1,006,730	\$240,250	\$218,125	\$274,399
2019	\$247,036	\$223,720	\$1,096,289	\$207,369	\$317,875	\$1,854,225	\$289,595	\$232,992	\$141,400	\$20,570,789	\$28,225,666	\$473,017
2020	\$2,251,815	\$453,426	\$245,533	\$90,098	\$519,741	\$4,957,091	\$3,404,067	\$14,065,369	\$7,830,956	\$184,057	\$266,548	n/a

STR Counts

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2014	109	153	103	98	130	139	111	152	151	182	159	149
2015	110	173	173	151	187	157	197	136	125	93	72	164
2016	160	184	176	179	173	139	129	108	121	94	82 .	110
2017	96	116	111	87	114	93	95	88	65	66	59	55
2018	21	20	14	22	22	13	36	45	29	28	21	28
2019	23	23	14	19	27	20	27	34	17	28	22	28
2020	22	38	27	13	4	8	20	15	9	9	15	n/a