

**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:

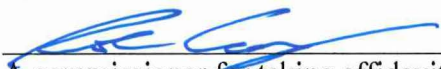
1. I am employed as an Anti-Money Laundering (“AML”) Business Intelligence Analyst for British Columbia Lottery Corporation (“BCLC”), and as such have personal knowledge of the facts and matters in this affidavit. Where I make statements in this affidavit that are not within my personal knowledge, I 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 8th, 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 8th DAY OF MARCH, 2021



A Commissioner/Notary Public for
the Province of British Columbia

STR Value

	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>
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

	<i>Jan</i>	<i>Feb</i>	<i>Mar</i>	<i>Apr</i>	<i>May</i>	<i>Jun</i>	<i>Jul</i>	<i>Aug</i>	<i>Sep</i>	<i>Oct</i>	<i>Nov</i>	<i>Dec</i>
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

