

---

**From:** Wanamaker, Lori PREM:EX  
**Sent:** Saturday, December 15, 2018 11:26 AM  
**To:** Pecknold, Clayton PSSG:EX  
**Subject:** Re: Fwd: German: Money Laundering

Hi Clayton. You can rest assured that I do not support any of the contractors having access to confidential policing information or pursuing any manner of investigation. I have been concerned about "tip lines" since the outset.

I believe the Expert Panel is interested in understanding process and approach. They should be focused on regulatory gaps that contribute to ML.

If it goes further than this, let me know and I will nip it in the bud.

Lori

Sent from my BlackBerry — the most secure mobile device

**From:** [REDACTED]  
**Sent:** December 15, 2018 9:05 AM  
**To:** [REDACTED]  
**Subject:** Fwd: German: Money Laundering

I sent this to Doug this am. Sending to you Lori as Shauna has approached me for a "contact" in the RCMP for your contractor. Some of the advice to Doug may be relevant.

The conundrum we find ourselves in is contractors looking for information from the federal force on a federal mandate and in the case of German and Lepard unwilling to do it through our (PSSG) authority and structure yet operating as free agents under the aegis of government. In Germans case he is apparently out there running down tips from a government portal under what authority I don't know. Plus there is a leaked federal RCMP report that may yet prove to be a breach of federal SOI act and a stayed federal prosecution that may or may not be linked to ongoing provincial investigations. Public commentary and contractors should in my view be constrained by those considerations.

In any event we will continue to give our advice but I suggest we should all be a little uncomfortable the aspects of the MAG initiative noted above.

MoF project seems much more structured from the documents I saw and Shauna and I will talk Monday. Perhaps AG side can be encouraged to adopt some of that structure.

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** December 15, 2018 at 7:51:42 AM PST  
**To:** [REDACTED]  
**Subject:** German: Money Laundering

Good Morning Doug.

Our staff were talking Friday further to the conversation you and I had earlier in the week. I am a little concerned that there is some confusion at the staff level so I thought a written approach for you and I might assist. I apologize for the length of the email but I am a little concerned there is misinformation and misconceptions floating around. I hope to clarify.

I understand Mr German is requesting access to RCMP protected information some of which is in the public domain allegedly from an unauthorized disclosure.

As we discussed there are mechanisms under the Police Act and Policing agreements for the SG or Director to enter into secure written arrangements with the RCMP in aid of the administration of justice and public safety in the province. This ensures adherence to the written agreements and statutory framework for both the province and the federal government. This also ensures clarity of roles and authorities vis a vis federal and provincial areas of responsibility, with respect to SG vs AG responsibilities and to ensure security of information, adherence to federal TB security standards, the Security of Information Act and our agreement with Canada as per PSBs present designation as Chief Security Officer for federal/provincial sharing of sensitive information. All of which apply to varying degrees depending on the underlying facts and context.

As discussed if there is a broad government direction to conduct an examination of money laundering in any sector of the economy there may well be very sound public policy reasons to engage some of these authorities under the direction and oversight of the SG and within legal parameters.

I have not been involved in Mr Germans engagement so I can't comment on how the forgoing would dovetail with his contract and mandate. If for example he has been given an unfettered independent mandate it would likely be inconsistent to use the Police Act as he would then be accountable through PSSG for aspects related to our mandate. In that case the best course of action would be for him to make representations/requests directly to the RCMP as a contractor citing his mandate and legal authorities etc. He would address that to the Commanding Officer.

I would note two points of caution for you to consider. If for example there is some thought to the AG writing directly to the RCMP seeking "Protected" or above information. (That holding federal information security designation) you will want sound legal advice on the authorities and responsibilities associated with such a request. Plus as that "report" referred to in the media was apparently disclosed without authorization there may or may not be an internal investigation underway. This is only conjecture on my part though you as a former police officer you may well have similarly speculated.

In a similar cautionary vein my staff has alerted me to concerns related to FOI and privacy of the information Tip portal. I assume you have those issues on your radar as well. I don't see it within my mandate to address the technical and legal aspects of a MAG initiative but if, for example, a future criminal investigation/prosecution failed because proper evidence handling or disclosure procedures were not followed on a tip or information (or no proper action was taken on a tip and a person suffered harm) that would engage PSSG regulatory oversight and expose government to liability.

Finally as we discussed this week, a few months ago when the media discourse commenced I commissioned a BN for our minister on priority setting related to organized crime (including money laundering of course) and the structures in place nationally to identify and validate those priorities for both federal and provincial organized crime resources. This BN was done in collaboration with E division Federal and Serious Organized Crime and was intended to ensure the SG had the best possible factual information and advice before him in the face of commentary and other statements in the public realm. As discussed we are vetting this BN to see if it can be shared with the broader DM ML committee through the DSG. I believe it may assist in understanding the structures in place related to F/P/T empirical intelligence led priority setting. We will provide the vetted (if any) copy through the DSG.

That said Doug, irrespective of public discourse (and apologies for stating the obvious) the bottom line is

that AML (Economic Integrity) has never left its place within the scope of the federal policing mandate. It, like all priorities, is balanced against other priorities such as drug and firearms related violence, Outlaw Motorcycle Gangs, transnational cartels and counter terrorism/national security. The National and Provincial targeted enforcement priority setting takes this into account. While respective governments set broad strategic direction these tactical priorities are set by the senior police experts of this country in line with their constitutionally protected independence. That's as it should be.

The issue is one of capacity. There has been a considerable concern over the past number of years with respect to federal ability to deliver on this mandate. My office, other PTs, RCMP leadership and successive provincial ministers have all expressed concern to the present and past federal governments about the erosion of federal policing capacity. Indeed when the former premier led a delegation to Ottawa of which I was part during the opioid task force she made it very public (using RCMP data we endorsed to her) that B.C. was seeing a 25 percent reduction in federal policing. That was in fact a conservative number which I believe was as high as 30 percent at its peak.

The reason for the reductions were rooted primarily in the convergence of the former conservative governments Deficit Reduction Action Plan (DRAP), structural deficits in National Police Services (NPS) and the emergence of serious National Security threats, domestic radicalization and returning foreign fighters or "travellers". The previous commissioner stated clearly to parliament proximate to the tragedy of the Hill that other federal work was suffering due to capacity. At the same time provinces and territories were focussed on gang related violence and serious violent crime as frankly they are now. Provincial resources are and should be focussed on gang related violence (the irredeemable tragedies of innocent people being caught in the crossfire of open air shootings) across the province, opioid related enforcement and harm reduction, and violence and exploitation of indigenous women and girls. The federal government should resource properly to its mandate as should we. (That's how the concept of cooperative federalism works in the policing realm) We have been resolutely advancing that to PSC for several years.

Hope this helps clarify the facts of matters and options available from PSB (subject to SG direction) to support and assist governments desire to study aspects of Money Laundering in an evidence based and public interest paramount manner within the federal/provincial framework.

On that basis PSB staff have been working well with your people and will of course continue to assist where requested while pursuing our existing public safety priorities as directed by our minister.

Again Doug. Hope this assists.

CP.

Sent from my iPhone