

Kim Fitzpatrick

From: Paul Dadwal
Sent: Wednesday, [Redacted - RCMP] 9:02 PM
To: Ross Alderson
Subject: Re: [Redacted - RCMP]

Ross,

This is great.

I'll call you tomorrow to try and arrange a time for coffee.

Been crazy busy.

Thx
Paul

Sent from my BlackBerry 10 smartphone on the Rogers network.

From: Ross Alderson
Sent: Wednesday, [Redacted - RCMP] 2:32 PM
To: Jeffrey, Kevin
Cc: Hussey, Joel; Dadwal, Paul; Daryl Tottenham
Subject: FW: [Redacted - RCMP]

FOR INFORMATION

We have information that some Casino players are obtaining cash (in mixed bills) from a money exchange in [Redacted - RCMP] called [Redacted - RCMP]. It is registered with FINTRAC as a MSB so at face value this appears a legitimate business.

However on [Redacted - RCMP] an individual [Redacted - RCMP] bought in for \$97,465.00 in mixed denomination bills at the Grand Villa and produced a receipt that from this cash exchange. The denominations were 200 x \$50, 3003 x \$20's; 1 x \$5. On [Redacted - RCMP] the same individual then bought in for \$170,005 at the Grand Villa. The denominations were 1200 x \$50, 5500 x \$20's; 1 x \$5. Both amounts according to receipts originated from a currency exchange for Chinese Yuan. (approx. \$1.5 million YUAN)

The individual has a local address however from a previous interview states his source of wealth is China based. So based on Chinese flight of capital laws it is unknown how that much Chinese currency made its way into Canada.

As per the BCLC directive to the Casino the source the funds was from a legitimate source (money exchange) so the buy in was accepted but obviously there are circumstances here which seem 'unusual.'

As a follow up on [Redacted - RCMP] I had two of our AML investigators attend [Redacted - RCMP] to validate the receipts were legitimate.

[Redacted - RCMP] acknowledged the receipts were from their location (confirmed on their computer system).

Redacted - RCMP acknowledged they do give out \$20's. Denominations they give out are allegedly Redacted - RCMP
Redacted - RCMP

Contrary to what we have been told by some patrons Redacted - RCMP

Specifics of the location are attached as per my analysts email.

I find it unusual that a Money exchange would 1. Carry that much cash on site and 2. Provide those types of denominations.

Regards

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC, V5M 0A6

PERSONAL INFORMATION

•Yes, and...•

PERSONAL INFORMATION

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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.

From: Brad Rudnicki
Sent: Thursday, Redacted - RCMP 3:16 PM
To: Ross Alderson
Subject: Redacted - RCMP

Ross,

It is registered with FINTRAC but I did notice the addresses are different between BC registry services (attached) and the FINTRAC registration (below).

Redacted
- RCMP

[FINTRAC MSB Information:](#)



FINTRAC - Money services business (MSB) registry search

- Obligations ▾
- Guidance ▾
- Reporting to FINTRAC ▾
- Reporting entities ▾
- Financial intelligence ▾
- Public

Home → MSB → Search by name → Name search results → MSB details

MSB Search

- Search by name
- Search by address
- Name search results
- XML report

Detailed information

- MSB details
- Branch details

MSB details



Brad Rudnicki

PERSONAL INFORMATION

•Yes, and...•

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Kim Fitzpatrick

From: Daryl Tottenham
Sent: Wednesday, [Redacted - RCMP] 9:38 AM
To: Paul Dadwal
Cc: Ross Alderson
Subject: FW: Money Exchange receipts
Attachments: 20160706061703265.pdf

Morning Paul,

I am sending you copies of the 3 most recent money exchange receipts we have received from patrons at River Rock which Ross has spoken to you about. The receipt from [Redacted - RCMP] is not a great copy but the details you need are visible. As this place has been described as [Redacted - RCMP], it is very possible that notwithstanding they are registered with Fintrac, they may not be reporting all transactions which would be a compliance issue and make them subject to penalties from Fintrac if confirmed. The reporting period for LCT's (Large cash transactions) is 15 days therefore they would have to report the cash pay-outs within that 15-day period to be compliant with the Act. For any suspicious transaction that should be reported to Fintrac, they have 30 days to file.

It might be very interesting to contact Fintrac after the 15 day window has elapsed and see if [Redacted - RCMP] actually filed LCT reports for these disbursements. We will be keeping copies of all money-exchange receipts we get from VIP patrons moving forward and our analysts will be doing OSINT dives on each business as well so we will keep your group apprised of what we find that may have value to you.

Regards,
Daryl

Daryl Tottenham Ba, CAMS
Manager, AML Programs
Corporate Security & Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC V5M 0A6

PERSONAL INFORMATION

●Yes, and...●

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups in B.C.

-----Original Message-----

From: Daryl Tottenham [Redacted - RCMP]
Sent: Wednesday, July 06, 2016 6:17 AM
To: Daryl Tottenham
Subject:

This E-mail was sent from "RNPCA445" (Aficio MP C4500).

Scan Date: 07.06.2016 06:17:02 (-0700)

Queries to: [Redacted - RCMP]

Redacted
- RCMP

Redacted
- RCMP

Redacted
- RCMP