

Questions:

1. Generally - provide further information on Robinson's reach out to OSFI and CBA re. wholesale changes to bank drafts. Specifically - provide the name of the individual Ben Robinson reached out to at OSFI; what did he hear back from OSFI, if anything?
2. (surrounding conversation about RCMP DOC_ID 1190): Emanating from Project Athena were there any RCMP or federal government efforts taken to ensure ("lobby for") legislative/regulatory amendments on bank drafts. Or were there any other measures (other than amendments) considered in respect of the use of bank drafts?

OSFI

On October 26, 2018, Sgt. Ben ROBINSON phoned Erin FEENEY from the Office of Superintendent of Financial Institutions (OSFI) to inform her of problems with bank drafts. Sgt. ROBINSON spoke to FEENEY and explained that bank drafts were vulnerable to exploitation in the context of the casino environment. He also explained Project Athena and advised that HSBC changed their drafts after learning about the vulnerabilities. Sgt. ROBINSON sensed FEENEY was receptive to the topics discussed and that she understood the purpose behind putting the purchaser's name on a bank draft. FEENEY advised she would talk about it internally and get back to Sgt. ROBINSON.

Sgt. ROBINSON does not have record or recollection of any return correspondence from FEENEY or OSFI.

(Sgt. ROBINSON's notes pg. 131)

CBA

On November 6, 2018, Sgt. ROBINSON and Staff Sergeant Joel HUSSEY presented to Canadian Bankers Association (CBA) representatives on the exploitation of bank drafts and explained the rationale for bank drafts to include the purchaser's name on the draft. The presentation took place at the CIBC office at 400 Burrard Street in Vancouver. Attendees at the meeting included BMO, CIBC, TD, Scotiabank, HSBC and Canada Western Bank.

(Sgt. ROBINSON's notes pg. 147)

On April 16, 2019, Sgt. ROBINSON spoke to Malcolm CHIVERS from the CBA about Project Athena. Sgt. ROBINSON inquired about CBA's attendance at the next Project Athena meeting, and offered to present in person to the CBA. CHIVERS advised that he would review the material [believed to be a reference to Project Athena material, which included explanation about the exploitation of bank drafts], contact the necessary people and follow-up with Sgt. ROBINSON. Sgt. ROBINSON found communicating with CHIVERS a challenge because he provided partial answers and did not sound forthcoming about knowledge of Project Athena.

(Sgt. ROBINSON's notes pg. 57 and 59)

*Sgt. ROBINSON attempted to contact CHIVERS, via phone and email, on numerous occasions before April 16, 2019.

Other

On December 11, 2018, Sgt. ROBINSON and Staff Sergeant HUSSEY presented to the Money Laundering Contact Group on the exploitation of bank drafts by underground banking and the need for bank drafts to include the purchaser's name on the draft to avoid easy exploitation. The meeting took place at RBC's office at 200 Bay Street in

Toronto. Attendees included Compliance Officers and Executives from the major banks in Canada, the RCMP, FINTRAC, and the Department of Finance Canada. In addition to Sgt. ROBINSON and S/Sgt. HUSSEY, the other RCMP representatives in attendance were C/Supt. Mark FLYNN, Supt. Peter PAYNE, and Francois MATHIEU.

(Sgt. ROBINSON's notes pg. 0 – email print out)

General

The impending disclosure of Sgt. ROBINSON's Project Athena material, which consists of administrative material of information resources of business value from January 1, 2018 to February 6, 2020, provides further reference to the above-mentioned efforts as well as other efforts and measures considered with respect to bank drafts. This includes reference to the undertaking by Melanie CHAUVIN, RCMP Analyst Supervisor from National Headquarters, to advance awareness with the CBA. It also includes efforts by the Gaming Policy Enforcement Branch (GPEB) to advance memorandums from the BC Attorney General to the CBA, which Sgt. ROBINSON did not support.

*** Of note, on June 10, 2020, Joseph MARI from Scotiabank informed Sgt. ROBINSON that CBA representatives met the week prior regarding changes to bank drafts. MARI advised that Scotiabank intended to make changes to their drafts.