



Royal Canadian Mounted Police    Gendarmerie royale du Canada  
Criminal Operations    Opérations criminelles

October 2, 2020

Ms. Brenda-Butterworth-Carr  
Assistant Deputy Minister and Director of Police Services  
Policing and Security Branch  
Ministry of Public Safety & Solicitor General

Via Email: **Personal Info**

**Subject: CIFA Resources and Funding**

Dear Ms. Butterworth-Carr:

Dating back to 2018, CFSEU-BC's JIGIT engaged with public and private stakeholders at the provincial and federal level to address challenges combatting money laundering at casinos in BC. This initiative, which evolved into Project Athena, was successful in bringing together the private sector, law enforcement, government, and regulator community and had success in making it more difficult to launder money through BC Casinos.

In October 2019, CROPS – FISOC initiated a new project known as Project E-Neutralize to be the RCMP's response the Cullen Commission of Inquiry into Money Laundering in BC. E-Neutralize was developed with a three pillar approach to support the Cullen Commission:

- Pillar 1 – Past state: disclosure of existing RCMP materials to support the Commission;
- Pillar 2 – Current state: working with business lines and existing AML regime on previous AML recommendations and coordinating RCMP response to the Commission including identification of SMEs and preparation of witnesses;
- Pillar 3 – Future state: forward looking to develop new solutions to combat money laundering including research on international best practices on use of more advanced models, legislation and laws in order to make recommendations to the Commission in these areas.

In December 2019, E-Neutralize further evolved and advanced Project Athena to a Permanent Public-Private Partnership, renamed the Counter Illicit Finance Alliance of BC (CIFA-BC) as a key solution to combat money laundering in BC.

Resources from the BC RCMP, RCMP National Headquarters, the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), the Department of Finance Canada, and the Financial Crime Coordination Centre (FC3) (formerly known as ACE) are working closely to develop a national model that is connected and aligned with the federal anti-money laundering regime and current public-private initiatives therein, while also ensuring that CIFA-BC, is tailored to the unique regional context of BC.

CIFA-BC set an ambitious but realistic goal of being ready for implementation for November 2020, by dividing development and setting milestones in four phases:

1. Research, Introduction and Endorsement – March 2020 to May 2020 - COMPLETED
2. Consultation and Engagement – May 2020 to August 2020 - COMPLETED
3. Model Development – August 2020 to November 2020 – AHEAD OF SCHEDULE
4. Implementation – November 2020

Four employees have been temporarily assisting with the development of CIFA-BC as per the timeline below and are expected to be required as noted:

January 2020 to present: The Sergeant Team Leader of JIGIT (position 00051929), who founded Project Athena, was backfilled by CDRS prior to a secondment to E-Neutralize to develop Athena to a permanent PPP alliance as the Director of Development. For consistency and to ensure successful implementation of CIFA-BC, it is requested that this resource should transition to the Director of Operations for year one of operations (no later than the end of calendar 2021).

May 2020 – present: One Corporal in E Division Major Crimes (position 00023613), with previous background working in FSOC Financial Integrity, was secondment to E-Neutralize. The member was identified as the Manager of Development to functionally progress engagement and consultation with identified stakeholders. For consistency and to ensure successful implementation of CIFA-BC, it is requested that this resource should transition to the Manager of Operations for year one of operations (no later than the end of calendar 2021).

May 2020 – present: CFSEU-BC identified an OCABC contract employee (position 8077) to complete disclosure request from the Cullen Commission for all Project Athena records. This request took a number of months and the resource learned the administrative side of Project Athena and many lessons learned, best practices and required changes for records management of a PPP. For consistency and to ensure successful implementation of CIFA-BC, it is requested that this resource should transition to the Records Manager for year one of operations (no later than the end of calendar 2021).

June 2020 – present: Recognizing a need for business support and research, a PSE on a 90 day casual contract with relevant work experience and a Master's degree was identified as being under-employed in Special I as an intercept monitor (50713), due to COVID. This employee is being utilized for business support, research and completing analytics for one to three days a week. To ensure successful implementation of CIFA-BC, this resource would transition to conduct research and analytical work when CIFA-BC operationalizes. For consistency and to ensure successful implementation of CIFA-BC, it is requested that this resource should transition to a temporary contract Strategic Research Analyst for year one of operations (no later than the end of calendar 2021).

As we draw close to the completion of Phase Three of CIFA-BC development which has included: completion of the CIFA model, CIFA framework, and conclusion of focus groups with 37 identified stakeholders, I note that the development of CIFA-BC would not have been possible without the above noted resources. In follow up to our recent conversation, I acknowledge that these temporary assignments cannot continue without the approval of the Assistant Deputy Minister and Director of Police Services Policing and Security Branch. In my role of Criminal Operations Officer for Federal, Investigative Services and Organized Crime, I am seeking: i) continued support in principle for the CIFA-BC initiative, and ii) approval for the continued temporary use of the four resources noted above within CROPS FISOC, in order to develop CIFA-BC through to implementation and operations while a permanent funding source is identified. I am in discussion with RCMP National Headquarters, Federal Policing to secure resources that would contribute to CIFA-BC on a permanent basis and hope to have a positive resolution on this matter by the end of this year. I also recognize that should the Province of BC wish to consider long-term involvement in CIFA-BC, a complete business case will be required once any Federal contribution has been identified.

Should you have further questions, please do not hesitate to contact me.

Thank you for your consideration,



Assistant Commissioner Dwayne McDonald  
Criminal Operations Officer  
Federal, Investigative Services & Organized Crime  
RCMP "E" Division

Personal Info

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