



December 4, 2018

556862

Mr. Jim Lightbody, CEO
British Columbia Lottery Corporation
2940 Virtual Way
Vancouver, BC V2C 1E2

Re: Source of Funds Declaration Identification Threshold

Dear Jim:

I am writing in response to the November 2, 2018 memo the British Columbia Lottery Corporation's (BCLC) Anti-Money Laundering (AML) unit shared with the Gaming Policy and Enforcement Branch (GPEB). The memo presents an amended policy aimed at better addressing risks of money laundering in gambling facilities by reducing the threshold for ascertaining customer identity from \$9000 to \$3000.

I would like to thank you for the opportunity to review the proposal and provide feedback. I appreciate BCLC's efforts to be responsive to ever-changing risks and align with international standards. GPEB supports this initiative, and I would appreciate BCLC keeping GPEB apprised of any improvements or implications related to the implementation of this new policy.

To ensure successful implementation of the policy, I recommend BCLC consults with service providers as they will be directly impacted by its introduction. I also recommend BCLC inform the AML Deputy Minister's Committee prior to implementing the proposed policy.

I look forward to further collaboration between our organizations to ensure the integrity of gambling and prevention of money laundering in the province. Should you have any questions or concerns, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "MacLeod".

Sam MacLeod
Assistant Deputy Minister and General Manager
Gaming Policy and Enforcement Branch
Ministry of Attorney General

**Ministry of
Attorney General**

Gaming Policy and
Enforcement Branch
Assistant Deputy
Minister's office

Mailing Address:
PO BOX 9311 STN PROV GOVT
VICTORIA BC V8W 9N1
Telephone: [REDACTED]
Facsimile: [REDACTED]

Location / Courier Address:
Third Floor, 910 Government Street
Victoria, BC V8W 1X3

Web: www.gaming.bov.bc.ca