



Know your limit, play within it.

November 27, 2018

556626

Pat Ennis, Executive Director, Corporate Security and Compliance,
Great Canadian Gaming Corporation
95 Schooner Street
Coquitlam BC V3K 7A8

Dear Mr. Ennis,

As you are aware, the Gaming Policy and Enforcement Branch (GPEB) is responsible for the overall integrity of gambling in the province. Under section 34(1)(f)(i) of the Gaming Control Regulation, it is a condition of registration for gaming service providers to obey the standard operating procedures (BCLC Standards) and rules of play set out by the British Columbia Lottery Corporation (BCLC).

In January 2018, BCLC implemented the new Source of Funds Declaration policy (the Source of Funds Policy). The policy requires that:

Patrons presenting cash or cash equivalents such as certified cheques, or bank drafts for buy-ins totaling \$10,000 or more must produce a source of funds receipt from the remitting financial institution. The receipt must show the patron's name, the name of the financial institution that issued the cash, certified cheque, or bank draft, and the patron's bank account number.

This policy was formally incorporated into the BCLC Standards in September 2018. The Source of Funds Policy is an integral control in anti-money laundering efforts, and compliance with this policy is critical for upholding the integrity of gaming in BC.

As you are aware GPEB conducted an audit of transactions in August 2018 at the River Rock Casino and the Hard Rock Casino to verify compliance to the Source of Funds Policy issued by BCLC in January 2018. Our audit found non-compliance with this policy, specifically around incomplete or missing documentation required to substantiate the source of the patron's funds. The results of our audit were shared with you on October 30, 2018 and your response was received by GPEB on November 13, 2018.

As this policy has now formally been incorporated into the BCLC Standards for two months, GPEB expects full compliance as required under section 34(1)(f)(i) of the Gaming Control Regulation.

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**Ministry of
Attorney General**

Gaming Policy and
Enforcement Branch
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BCLC0006200

GPEB will be conducting a follow up audit at the River Rock Casino and the Hard Rock Casino in early 2019 to verify full compliance with this policy. Please be advised that any further findings of non-compliance will result in escalating administrative sanctions which could include additional conditions being imposed on your registration, fines, suspensions and/or cancellation of registration pursuant to sections 69(1)(a) and 68(c)(i) of the *Gaming Control Act*.

Sincerely,

A handwritten signature in black ink, appearing to read "MacLeod", written in a cursive style.

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

Cc: Rodney N. Baker, CEO, Great Canadian Gaming Corporation
Jim Lightbody, CEO, BC Lottery Corporation

GPEB is a 2018 recipient of the BC Public Service Top Work Unit Award