

Incident File Full Report

[Incident File #IN20200006443](#)

Record Creation Details

Date/Time Occurred: 1/29/2020 6:23 PM
Day of Week Occurred: Wednesday
Date/Time Created: 1/29/2020 7:12 PM
Date/Time Closed: 2/ 5/2020 9:28 AM
Closed By: stolee

Department: Surveillance
Owner: jjnorman
Operator ID: jjnorman
Operator Name:
Personnel ID:
Card Number:
Job Position
Secondary Operator:

Location of Incident:

Property: River Rock (GCC)
Location: Casino Floor-River Rock (GCC)
Sublocation: RYBX 03

Details of Incident:

Daily Log #: DL20200087098
Type: Gaming
Specific: Unusual Financial Transaction
Category: Unsubstantiated
Incident Status: Closed
Synopsis: UFT - SID 123838 [REDACTED] B/I \$4k (200 x \$20's) on RYBX03. WS10.
- C5077 at 17:46:40 drop off. (White lexus)

Checklist: - Section 86 Form
At 19:53hrs; B/I \$2K (20's) on RYB07. Total B/I: \$6K. WS10. (jjn)

Narrative:

Created On	Created By	Modified On	Modified By
1/29/2020 7:12 PM	jjnorman		

UFT - SID 123838 [REDACTED] B/I \$4k (200 x \$20's) on RYBX03. WS10.
- C5077 at 17:46:40 drop off. (White lexus)

Executive Brief:

Participants Involved:

Subject

Full Name: [REDACTED] Company:
Role: Info From

Police Contacted: Taken From Scene: Police Contacted Result :

Reporting Party:

Supervisor:

Supplemental Entries:

SP20200015669 Attached by malianza on Jan 29, 2020 19:14

Description

Surveillance was advised of a large buy-in using \$20 denominational bills. Patron: [PERSONAL INFO] (SID 123838) - listed occupation "Owner Detail Business". No Incidents and No associates. International phone number and local address.

Although this amount is below FINTRAC-LCT reportable threshold and BCLC SOF requirements, there are some areas of this transaction that could be considered unusual.

- 1. It is unknown if [PERSONAL INFO] occupation deals primarily in small denominational bills but could be considered unusual.
2. Bills bound with elastic bands has been an indicator that funds used did not originate from a recognized financial institution, such as a bank, atm, or global cash&win.
3. It would be considered unusual and unlikely that a BC Casino would issue small denominational bills for large casino disbursements.
4. The bills were packaged in \$2K bundles - which has been an indicator that funds may be from questionable sources.
5. [PERSONAL INFO] occupation could be considered vague.

Footage shows the following with times approximate:

At 17:46 [PERSONAL INFO] is dropped off on property just off River Rd by a white SUV (possibly Lexus). Lexus does not enter valet nor does it come into clear camera view (GC way/River Rd). [PERSONAL INFO] is carrying an item as he enters resort doors and enters lobby washroom.
At 17:55 [PERSONAL INFO] enters casino east entrance accessing his phone as he walks westbound on the gaming floor.
At 17:57 [PERSONAL INFO] puts on a facemask (surgical mask), briefly enters washroom before beginning to write on a Baccarat tracking sheet at RYB01.
At 18:14 [PERSONAL INFO] removes two bundles of his pockets at RYBX03 and places them on the table for buy-in. DLR removes the elastic bands and begins the count.
At 18:25 DLR completes the count for a total of \$4K (200x\$20). [PERSONAL INFO] receives chips and walks around to various tables, marking numbers on the Baccarat tracking card. His gaming activity is limited, with bets ranging at ~\$20 wagers.
At 19:48 [PERSONAL INFO] removes a bundle of \$20s from his jacket pocket and places it on RYB01 for table buy-in. DLR removes the elastic band and completes the count for a total of \$2K (100x\$20). [PERSONAL INFO] receives 2x\$1K chips and places the chips in his pocket. [PERSONAL INFO] continues to remain at RYB01.
At 21:40 [PERSONAL INFO] accesses his phone and was last seen walking off site on No3 Rd.

Footage JAN20\UFT\20-06443

MLIANZA
30068

SP20200019222 Attached by stolee on Feb 4, 2020 12:26

Description

The individual and associates of the individual who conducted the transaction(s) have no adverse media, court records or are a subject of request by a Law Enforcement agency.

Additional rationale includes:

Reporting Party:

Supervisor:

- No receipt was presented at the time of transaction (patron was not asked to source the funds)
- Patron may be unaware of requirement to source funds via receipts.
- Established/known business relationship
- Lack of established history in BC Casinos makes it premature to assume the money could be of questionable sources or related to money laundering
- Amounts involved could reasonably be obtained via ATM/bank account withdrawal
- Lack notable industry indicators
- No prior substantiated Unusual Financial Transaction (UFT) incidents on file
- No irregularities were noted in patrons play, was putting reasonable amounts at risk relative to the buy in amount(s)
- Patrons occupation may reasonably source wealth when considering amounts involved, frequency of play etc.
- Patrons occupation may reasonably source a certain amount of cash.
- Patron arrived at the casino with the funds used on his/her person.

SUMMARY:

RE: Refused SOF Request. writer reviewed this incident.

The directive requires receipts for all buy ins or accumulated buy ins reaching or exceeding \$10,000 in a rolling consecutive 24hr period.

On Feb/05/2020 writer reviewed this incident, surveillance footage shows that on the date of Jan/29/2020 at 1747:48 hrs patron identified as [PERSONAL INFO] (SID#123838) arrived alone at the hotel lobby, [PERSON] appears to be on foot from Great Canadian Wa.

At 1814:33 hrs [PERSON] was seen buying in on RYBX3 for \$4,000 in \$20 bills and begins to play on various tables.

At 1947:54 hrs [PERSON] bought in for \$2,000 in \$20 bills on RYB7 and continues to play. (it is noted that patron was not approached as the buy-in amount is well under the SOF requirement.)

In this case [PERSON] was able to buy-in for total of \$6,000 in \$20 bills which is well under the \$10,000 threshold therefore [PERSON] was not approached for receipt.

A review of [PERSON] subject profile was done, [PERSON] has no previous incident on file, [PERSON] have been generating LCTR since Aug/2012.

The investigator has determined that these circumstances are not suspicious and lack notable industry indicators therefore unless further information comes to light that may suggest [PERSON] or the funds he used on this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

Reporting Party:

Supervisor:

SP20200019222 Attached by stolée on Feb 4, 2020 12:26

SP2020001922

2 - Continued-

The category has been amended the report details to UFT / Unsubstantiated.

Stone LEE
BCLC Investigator

SP20200019725 Attached by sbEEKSMA on Feb 5, 2020 12:03

Description File has been reviewed and the circumstances of this file do not meet the reporting requirements for FINTRAC reporting therefore can be concluded this point without further action.

SBEEKSMA
BCLC - AML Project Specialist

SP20200045912 Attached by stolée on Jun 17, 2020 14:46

Description As a result of the closure of BC Casinos due to the COVID 19 pandemic, BCLC's AML unit took this opportunity to conduct a review of all incidents reported by casino service providers as unusual at BC Casinos from 2019-JAN-01 to date to ensure accuracy and completeness.

Files are also being assessed to ensure adequate evidence is present to support the incident being categorized as "unsubstantiated".

Where incidents are lacking supporting evidence/rationale for the unsubstantiated categorization historical STR's will be submitted.

On the above date this file was reviewed and it has been confirmed the circumstances of this incident do not meet the requirements for FINTRAC reporting therefore can be concluded this point without further action.

Stone LEE
BCLC Investigator

Reporting Party:

Supervisor: