

**GAMING POLICY AND ENFORCEMENT BRANCH**  
**INVESTIGATION DIVISION** **REPORT OF FINDINGS – 10/10/04**

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**Complaint of – Failure to Report**  
**Date of Complaint – 2010/06/21**  
**GPEB File – INV 32835**

**NAME: Paragon Gaming( Doing Business as) Edgewater Casino**

**BACKGROUND:**

On May 20<sup>th</sup> 2010 an anonymous email was sent to the General Manager of the Edgewater Casino Paul AHLUWALIA. The writer identified themselves as an employee of the Edgewater Casino. The person expressed concerns regarding the High Limit Hosts. An allegation was made that hosts were breaking rules and they had a close association with loan sharks. The writer further stated that the Edgewater turned a blind eye to loan sharking activity because it helped the bottom line.

The email expressed concern that there was a recent policy change and High Limit Hosts were able to accept tips. The position was a non union salaried position and non gratuity earning. The writer objected to High Limit hosts being able to accept tips. The matter was brought up to casino management but it wasn't resolved to the complainant's satisfaction.

The writer went on to describe a specific incident which occurred in the High Limit Room on May 18<sup>th</sup>. The High Limit Host on that date was identified as Cecilia. She was alleged to have assisted a high limit player known only as "eyebrows" by calling a loan shark after the player had lost all his bankroll.

The player was stated to have left the casino with a female loan shark after Cecilia made a call on her cellular phone to arrange the meeting. He returned approximately 1 hour later in the day to play in the High Limit Room.

"Eyebrows" had a change of luck and was consistently winning. At one point the player held up a chip as if to offer it as a tip to Cecilia. She said something to him in Mandarin and the offer was withdrawn.

A short while later Cecilia was summoned to step outside the High Limit Room by the alleged loan shark. The writer believed that an exchange took place out of sight of casino staff and that the tip was made in gratitude for arranging the introduction with the player to the loan shark.

General Manager of the Edgewater Casino Paul AHLUWALIA requested that Farzad AMEDI investigate the allegations to see if they had merit. AMEDI is the Surveillance Manager for Paragon Gaming and is responsible for all their gaming venues including the Edgewater Casino. AMEDI reviewed the surveillance footage and also had surveillance managers at the Edgewater review the video and they found no evidence to support the allegations.

The matter was concluded as unfounded and the email was not forwarded to the Gaming Policy and Enforcement Branch and no Form 86 was submitted.

On June 20TH 2010 a second email was sent. It was directed to Doug Morrison who is the Manager of Casino Security and Surveillance for BCLC as well as Rich Coleman who is the Cabinet Minister for Housing and Social Development, Shane Simpson the NDP critic for Housing and Social Development and Jon Woodward a CTV reporter who has done recent reports on gaming related issues in the Province.

The email restated the same concerns which were expressed in the earlier email. The writer further expressed concern about the relationship between Edgewater High Limit Hosts and loan sharks. The writer further stated that the Edgewater Management as well as GPEB and BCLC have a "see no evil" attitude and are sweeping the matter under the rug.

#### **INVESTIGATION:**

I was notified of the complaint on June 21<sup>st</sup> 2010 by BCLC Investigator Stone Lee. He had become aware of the complaint that day.

I requested a copy of the ITRAK report which also contains the emails sent by "John Williams" I ran John Williams on registration and found there were no registered gaming workers by that name.

I sent an email to "John Williams" I explained that I was and that I am a sworn Police Officer with the Province and that I was responsible for maintaining the integrity of legalized gaming in the province. I requested that he contact me at the numbers that were provided.

The General Manager Paul AHLUWALIA is no longer working for the Edgewater casino and is no longer registered. He left his position before I had an opportunity to interview him. I contacted the manager of Surveillance Farzad AMEDI and advised that I was conducting a Post Registration investigation on the High Limit Host as well as the failure to report. I was advised that the matter was referred to AMEDI by the General Manager. He reviewed the surveillance video and found nothing to substantiate the allegations. AMEDI requested that Edgewater Surveillance Manager Rosamond SMITH as well as surveillance supervisors review the video to determine if there was an exchange of chips on May 18<sup>th</sup>. They all found that there was no evidence to support the claims made in the emails.

AMEDI stated that the allegations appeared unfounded and because the complainant was anonymous the matter was not reported to GPEB. A written statement was obtained from AMEDI.

I attended the Edgewater Casino on June 23<sup>rd</sup> 2010 and reviewed the available surveillance footage. The video shows the High Limit Host Cecilia on May 18<sup>th</sup> 2010, she appeared to be speaking with the patron "eyebrows". The video then shows Cecelia summoned outside by the female who was described as a loan shark. They then left the High Limit room together. Once outside there is no hand to hand exchange and there is nothing suspicious observed on camera. They appeared to be speaking briefly then they returned to the High Limit room.

I requested a copy of all the surveillance video. I then requested a complete list of all High Limit Room staff that were on afternoon shifts on May 18<sup>th</sup> 2010. I learned that High Limit Host Cecilia is actually Hio-Peng (Cecilia) NG. I contacted her by phone and an interview was arranged for June 28<sup>th</sup> 2010 at GPEB headquarters in Burnaby. NG was asked if she has a company cellular phone. She stated she uses her own phone and the Edgewater pays her bill because she uses it for work. She was requested to bring her detailed billing to the interview.

On June 28<sup>th</sup> 2010 I received a response from "John Williams". He was not interested in meeting face to face and in his own words much of what he has to say would be considered hearsay and he had no irrefutable proof.

Later the same day I conducted an interview with Cecilia NG at GPEB offices in Burnaby. She stated that several months earlier the Edgewater Casino changed policy and allowed High Limit Hosts to accept tips. They were considered a part of Guest Services and it was felt they should be rewarded for the work they do which included duties away from the casino not during work hours. Cecilia stated the High Limit players were given her cellular number and she would be contacted directly to arrange tables or to assist with matters not directly related to her Edgewater duties such as interpreting documents.

She stated that the regular casino staff were upset with the change in policy because they felt their tips were reduced because the money was going to the High Limit Hosts. The policy was changed again, High Limit Hosts were allowed to accept tips but it had to be at their station outside the High Limit room and not in plain view of the rest of the staff.

Cecilia remembered the incident on May 18<sup>th</sup> 2010. She stated the player referred to as "eyebrows" spoke Mandarin to her and offered her a tip. She told him in Mandarin that she was not allowed to accept tips. She stated she spoke to him in Mandarin because he does not speak English.

NG stated she does not recall speaking with the female and she stated she did not accept or was offered anything from her. She does not know the identity of the female.

NG stated she does not arrange meetings between patrons and loan sharks. She stated that if a player exhausts his bankroll they are instructed to speak with the patron and subtly suggest it was not their day and that they should come back another time. If they persisted to continue playing she would advise them about the Global Cash Advance machine in the Bistro. The machine has a no limit, the money available depends on the individual's credit history.

NG brought with her the detailed billing for her cellular phone. There were no outgoing calls made during the time she was alleged to have called a loan shark for "eyebrows".

On July 5<sup>th</sup> 2010 I sent a letter to every employee who was working the High Limit Room on the afternoon shift on May 18<sup>th</sup> 2010. I received very few responses with most contacting me to advise they saw nothing unusual.

One employee Eugene Olereismo called me on July 15<sup>th</sup>. He stated that "eyebrows" was in the High Limit room earlier in the day on May 18<sup>th</sup> and lost. He returned later around the same time as a group of females.

Olereismo remembered that "eyebrows" was winning and he tipped the other players at the table but not the dealers. He picked up a chip and it appeared as if he was offering it as a tip to Cecilia.

Words were exchanged in Chinese and "eyebrows" passed the chip to one of the females. A short time later the female and the High Limit Host left the room. He did not see an exchange because he remained in the High Limit room. Olereismo assumed an exchange occurred between the two females once they left the High Limit room. Olereismo does not know who the female is and has no knowledge whether she is a loan shark.

Attempts to identify the female have been unsuccessful. There was no incident created on May 18<sup>th</sup> so there is no close up taken and no suitable video to obtain a still photo for circulation.

There was a possible identification on "eyebrows". He was possibly identified as [REDACTED]. He has noticeably prominent eyebrow and resembles the person in the surveillance video. [REDACTED] has no history on ITRAK for activity consistent with loan sharking. He has a limited history for large cash transactions. His phone number is no longer in service and he did not respond to a letter.

**FINDINGS GENERAL:**

There is no evidence to suggest that a High Limit Host had arranged a meeting between a patron and a loan shark.

- Surveillance video was reviewed and there was no exchange between the host and patron.
- Cecilia NG'S cellular phone records were obtained and there were no outgoing phone calls made when the loan shark was allegedly called to attend the Edgewater Casino.
- Letters were sent to all casino staff on duty on the day of the alleged offence. They were promised anonymity and no one came forward with evidence which would support the claims made in the emails.
- The writer of the emails wished to remain anonymous but he/she did correspond via emails. In subsequent correspondence he/she admitted that much of the evidence he/she had to give was hearsay and speculated as to what had occurred when the participants were out of his/her view.
- Cecilia NG was interviewed and denied ever arranging meetings between loan sharks and casino patrons.
- The writer of the email appears to have a strong bias. He/she expressed dissatisfaction that Edgewater policy had changed to allow High Limit Hosts to accept tips. This appears to be the motivating factor as to why he/she came forward.

**CONCLUSION:**

The allegations that a High Limit Host at the Edgewater Casino arranged a meeting between a patron and a loan shark are unfounded. There was no evidence to support the allegations made anonymously in the email sent on May 20TH 2010 or the subsequent email sent June 20TH 2010.

The Edgewater investigated the complaint and when they could find no video evidence they concluded the matter as unfounded allegations from an anonymous source.

Loan sharking is a serious offence which could seriously undermine the integrity of legalized gaming in the province. Loan sharking is reportable to the Gaming Policy and Enforcement Branch under Section 86 of the Gaming Control Act.

The allegations related to a specific event and should have been reported to GPEB for further investigation. The writer of the emails had stated that the Edgewater was complicit in allowing loan sharking to occur.

The allegations were serious and must be conducted by an independent third party. The investigation must be free of actual or perceived conflict of interest. Whether the Edgewater Casino responded appropriately and proportionately to the gravity of the incident is brought into question when they investigated themselves. This became evident in the subsequent email sent on June 20TH 2010 alleging that the complaints weren't being taken seriously.

The failure to notify is an error in judgment and there is no evidence to suggest there was any intention to deliberately withhold the information from GPEB. The Edgewater has an excellent history of reporting as required.

This information is forwarded to GPEB Registration for their attention. All collected investigational material including the audio/video discs will be forwarded all with the GPEB Investigation file.

NFAR by GPEB Investigations

Concluded Here

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