

**To:** Scott, Douglas S AG:EX **PERSONAL INFORMATION**  
**Cc:** Richard Fyfe **PERSONAL INFORMATION**  
**From:** Jim D. Lightbody  
**Sent:** Fri 13/04/2018 1:24:35 AM  
**Subject:** Request by Ministry of Finance  
[STR and Table Performance.pdf](#)

Doug,

Attached is a report that provides context and background to help Ministry of Finance's question around the effect of lower STR numbers and \$value on Table Drop (Revenue before player winnings).

I can also report that BCLC's Table net win revenue in fiscal 17/18 was up over the previous year.

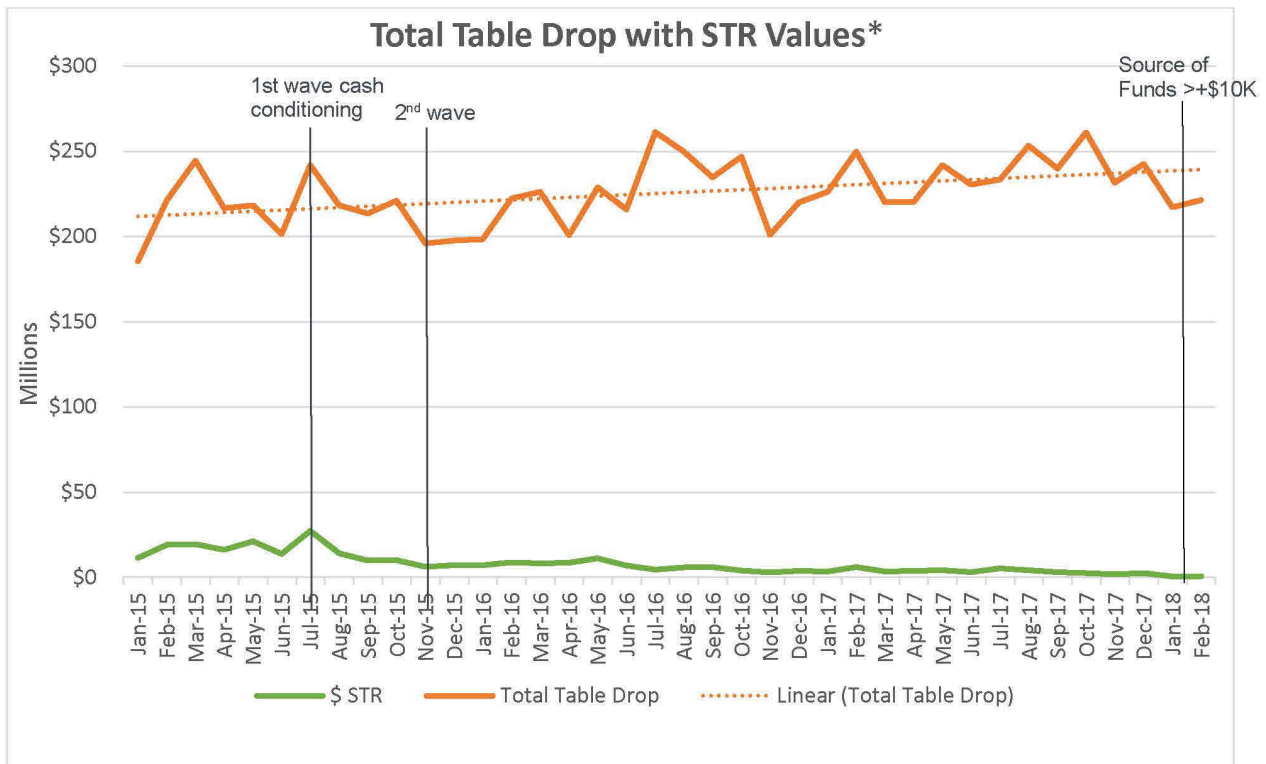
If you or they have further questions, please advise.

Jim

# Suspicious Transaction Reports (STR) and Table Performance

April 12, 2018

Since 2015, the total number, total value and average value of STR has been trending down, while total table drop has continued its upward trend.



\* All data presented in table form below.

## Key points:

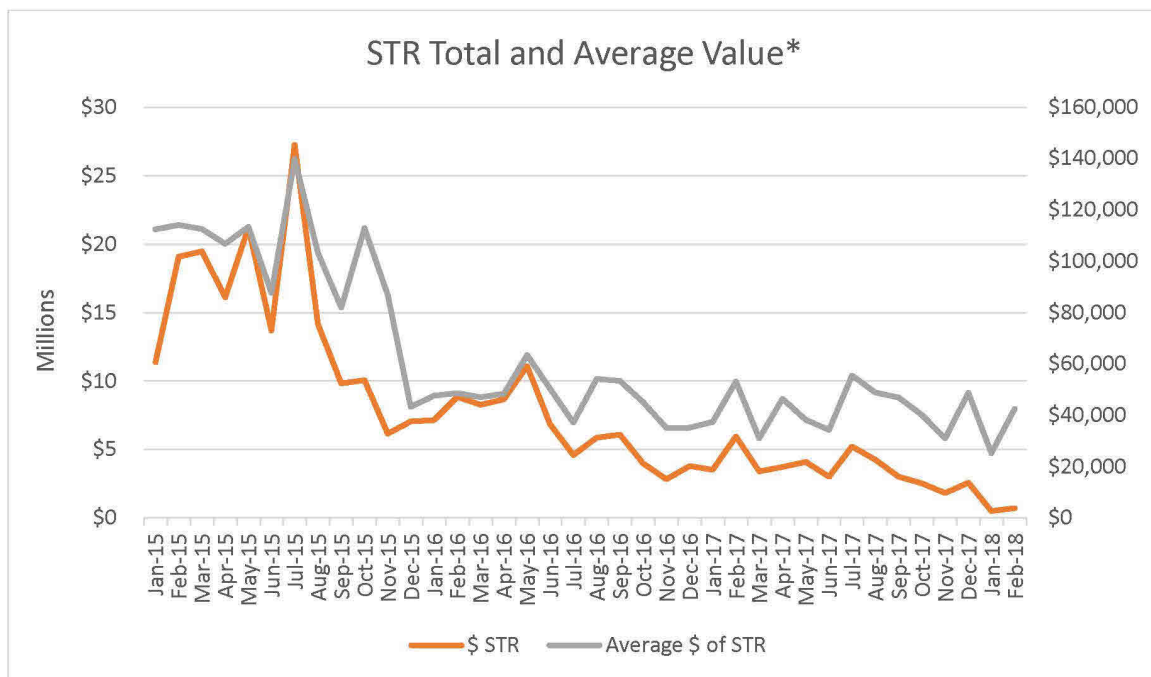
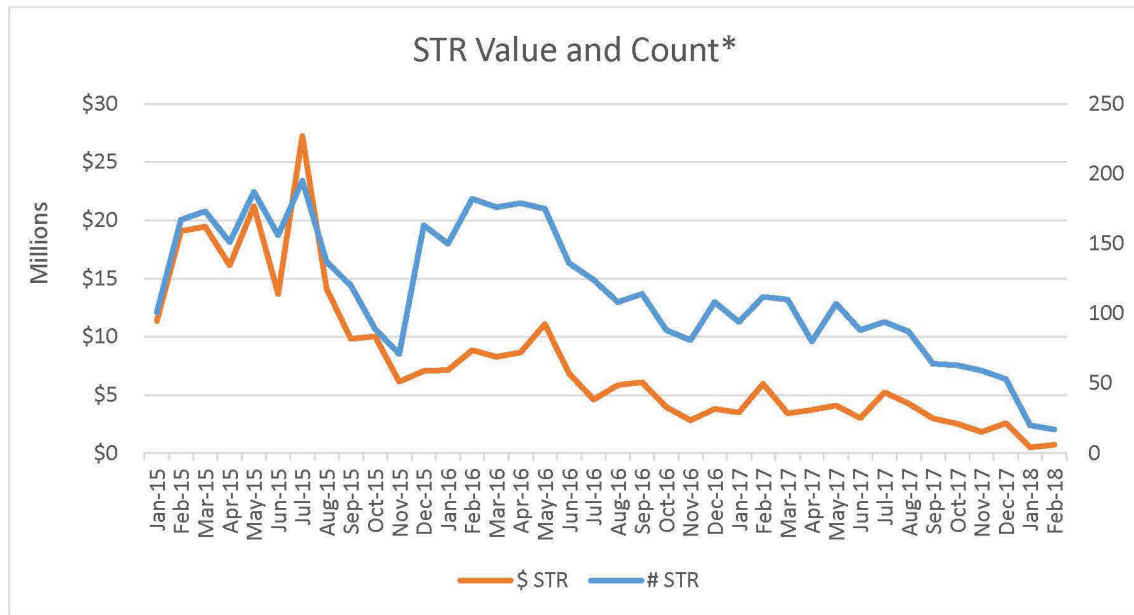
In April 2015, BCLC initiated a sourced-cash condition program to address the unexplained increase in un-sourced cash and chips being brought into lower mainland casinos. As part of its AML due diligence screening process, BCLC Investigators interviewed certain VIP players to determine the origin of their cash and chips. If a player was unable to prove source of funds, or BCLC suspected or received information that the source of funds originated from underground banking operations, or suspected proceeds of crime, the player was immediately placed on "sourced cash conditions" and would only be allowed to buy-in if they could provide the service provider cash cage with an original receipt sourcing the funds as follows;

- A bank draft, EFT, certified or Casino Cheque (as defined under policy)
- Cash drawn from an accredited Financial Institution
- Cash drawn at the gaming facility using Global Cash, Debit at Cage, ATM

or that the source of funds originated from;

- Cash verified as from a recent sourced Casino Disbursement
- Chips verified as from a recent sourced Casino Disbursement
- Dollar value of STR has decreased (as have counts – see next table)

Jan 10, 2018 – Implemented Source of Funds Declaration for cash deposits of \$10,000 or more as per Peter German's interim recommendation to BCLC.



\* All data presented in table form below.

#### Key points:

- Both the count, total value and average value of STR have been decreasing since 2015, with a significant drop in the second half of the year when BCLC began cash conditioning players.
- Not only are there fewer STR, the ones that are reported are decreasing in value.

Month	# STR	\$ STR	Total Table Drop	\$ STR as a % of Total
Jan-15	101	\$11,356,965	\$185,417,014	6.1%
Feb-15	167	\$19,064,854	\$221,147,991	8.6%
Mar-15	173	\$19,462,764	\$244,375,305	8.0%
Apr-15	151	\$16,123,855	\$216,608,331	7.4%
May-15	187	\$21,201,775	\$218,186,402	9.7%
Jun-15	156	\$13,676,465	\$201,344,040	6.8%
Jul-15	195	\$27,243,150	\$241,888,750	11.3%
Aug-15	137	\$14,138,565	\$218,164,623	6.5%
Sep-15	120	\$9,825,950	\$213,405,914	4.6%
Oct-15	89	\$10,045,281	\$220,930,949	4.5%
Nov-15	71	\$6,159,039	\$195,892,062	3.1%
Dec-15	163	\$7,055,010	\$197,654,842	3.6%
Jan-16	150	\$7,149,960	\$198,290,501	3.6%
Feb-16	182	\$8,847,035	\$222,322,359	4.0%
Mar-16	176	\$8,271,680	\$226,148,655	3.7%
Apr-16	179	\$8,653,255	\$200,745,010	4.3%
May-16	175	\$11,096,690	\$228,732,489	4.9%
Jun-16	136	\$6,853,117	\$215,754,977	3.2%
Jul-16	124	\$4,601,405	\$261,176,104	1.8%
Aug-16	108	\$5,850,500	\$249,726,100	2.3%
Sep-16	114	\$6,081,832	\$234,568,406	2.6%
Oct-16	88	\$3,969,055	\$246,717,806	1.6%
Nov-16	81	\$2,836,569	\$200,837,162	1.4%
Dec-16	108	\$3,800,280	\$219,896,314	1.7%
Jan-17	94	\$3,507,455	\$226,231,338	1.6%
Feb-17	112	\$5,948,770	\$249,814,715	2.4%
Mar-17	110	\$3,410,960	\$219,979,501	1.6%
Apr-17	80	\$3,715,810	\$220,153,775	1.7%
May-17	107	\$4,095,101	\$241,729,928	1.7%
Jun-17	88	\$3,020,060	\$230,312,458	1.3%
Jul-17	94	\$5,216,080	\$233,368,366	2.2%
Aug-17	87	\$4,254,290	\$253,317,319	1.7%
Sep-17	64	\$3,000,605	\$239,804,737	1.3%
Oct-17	63	\$2,530,020	\$261,022,645	1.0%
Nov-17	59	\$1,828,050	\$231,477,360	0.8%
Dec-17	53	\$2,582,140	\$242,634,757	1.1%
Jan-18	20	\$505,199	\$217,174,414	0.2%
Feb-18	17	\$721,630	\$221,439,676	0.3%