

Affidavit #1 of S. Lee
Sworn on the 23rd day of October, 2020

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA

The Honourable Mr. Austin F. Cullen, Commissioner

AFFIDAVIT

I, Stone Lee, of 2940 Virtual Way, Vancouver, British Columbia, SWEAR THAT:

1. I am an investigator in the Anti-Money Laundering (“AML”) unit of the British Columbia Lottery Corporation (“BCLC”), a participant in this Commission of Inquiry, and as such, have personal knowledge of the facts and matters hereinafter deposed to, save and except where such facts and matters are stated to be made upon information and belief, and as to such facts and matters I verily believe them to be true.
2. I swear this affidavit to provide evidence to the Commission pursuant to a summons issued to me under the *Public Inquiry Act*.

Work History with Great Canadian Gaming Corporation (“Great Canadian”)

3. I began working in the gaming industry in 1997, as a dealer for Great Canadian at the Richmond Casino.
4. After approximately two years as a dealer at the Richmond Casino, I transferred to Great Canadian’s security and surveillance department and started working at the Holiday Inn Casino as a security officer in or around late 1998 or early 1999.
5. I eventually became a manager of surveillance at Great Canadian in approximately 2000, before leaving to join BCLC in 2008.

Observations at the Richmond Casino

6. When I started as a dealer in 1997 at the Richmond Casino, the table limit was \$500 for baccarat.

7. For the two years I worked as a dealer, I observed that most patrons playing at the baccarat table limit would buy-in for around \$5000. It was uncommon for patrons to buy-in for \$10,000 or more.
8. I recall one specific instance of a patron entering the casino with a bag of cash during the period I worked as a dealer at the Richmond Casino. A young Asian woman dumped \$10,000 in \$20s out of a Prada bag onto my table. The entire table was covered in \$20s, as dealers had to lay bills out on the table so that surveillance could see them when counting a buy-in. I do not recall if this woman played after buying in. This incident stood out to me because she appeared to be a teenager but I would not say this was unusual at the time.
9. As a dealer at the Richmond Casino, I also observed individuals hanging around the tables watching patrons play, but these individuals would not play themselves. As patrons lost money, they would often chase their losses and ask others around them to “help them out”. I understood this to be a request to borrow cash so that they could continue to play, and I understood that the individuals hanging around the tables would provide money to these patrons, either on the casino floor or outside of the casino. I did observe these individuals handing patrons money or chips on the casino floor on more than one occasion. At the time, this was not against the casino’s rules.
10. I and others working at the Richmond Casino would refer to these individuals who would hang around the tables as “loan sharks”, even though I was not aware of the specifics of these transactions. I did not, for example, know the rate of interest charged. I also generally did not witness these transactions as a dealer (except for those that occurred on the casino floor before me), but I would notice patrons who had lost their bankroll leave the casino and return a short time later with more cash.
11. I noticed these individuals but my job as a dealer was to focus on dealing and table security. At this time, there were strict rules about dealers interacting with patrons. Dealers had to speak exclusively in English and avoid certain topics of conversation (e.g., politics or religion). Interacting with patrons outside of the casino was strictly prohibited.

12. As a dealer, I also observed chip passing between individuals, which was not against the rules at the time. In my experience, there are two general types of chip passing. The first is when someone gives a chip to someone else to use. The second is when an individual is unable to place a bet and passes chips to another patron so that they can make a bet on their behalf. In baccarat, for example, there are multiple rows of players, and patrons in the back row who are unable to reach the table have to pass chips to individuals closer to the table in order to bet.

Observations at the Holiday Inn Casino

13. As a security officer at the Holiday Inn Casino, I also observed people who I would refer to as “loan sharks” at work. At the Holiday Inn Casino, these individuals would often sit in the lounge area as though it was their office.
14. I would see [PERSONAL INFORMATION] at the Holiday Inn Casino. I first became aware of Mr. [PERSON] when I noticed a Chinese player gambling heavily, placing \$20,000 bets in or around 1999. He had many people around him, including “loan sharks”. I did not know who he was until I later saw a photo of Mr. [PERSON] on the cover of a Chinese-language magazine with the headline, “China’s Most Wanted”, in or around that time.
15. I alerted my manager to Mr. [PERSON] identity but I am not aware of any action being taken in response to this. I cannot recall exactly who my manager was at this time.
16. It was around this time as a security officer that I first interacted with Gaming Policy Enforcement Branch (“GPEB”) investigators, such as Ed Rampone. I recall that Mr. Rampone and I would greet each other when he entered the casino before he walked to the surveillance room.
17. While I was a security officer at the Holiday Inn Casino, BCLC and GPEB investigators would visit the casino every few weeks, but never at the same time. BCLC and GPEB investigators did not usually speak to floor security staff like myself. I understood that these investigators were visiting the casino to investigate incidents.

18. When I moved into surveillance, I began to work more closely with BCLC staff as the casino would be audited by BCLC every three months for compliance with BCLC's policies and procedures. Moreover, all BCLC investigators at this time were retired police officers. Many did not understand gaming intricately and had difficult identifying cheating. I would walk these investigators through our surveillance videos to explain what they were seeing.

Great Canadian's Response

19. While I was still working at the Holiday Inn Casino, policies were instituted prohibiting individuals from loitering near high limit rooms and tables if not playing. I understand that the purpose of this policy was to prevent the "loan sharks" from hanging around the VIPs.
20. When I worked for Great Canadian and reported loan sharking incidents to the casino operation manager on duty, I was often met with resistance from management, who said these reports could not be proven. Because of this, while I was never directed to ignore the "loan sharks", I believed that management at Great Canadian thought they should be tolerated. One particular manager who I recall denying my reports of loan sharking incidents was Ken Stratton, who was the general manager of the Holiday Inn Casino at the time.
21. I recall an incident in or around 2000 when Great Canadian security personnel pulled a series of individuals who I understood to be "loan sharks" off the casino floor and escorted them through the Holiday Inn Casino to a lounge where Adrian Thomas, then a Vice President at Great Canadian, was located. I became aware of this incident because I reviewed the surveillance operator monitor station that contained footage of this incident the next day.
22. I also recall a later incident as a surveillance manager when I reported a loan sharking incident that resulted in **PERSONAL INFORMATION** being banned by Great Canadian from Great Canadian's casinos. I do not recall the substance of the report that led to the banning.

23. Following the banning, I was informed by my supervisor, Glen Warner, that Mr. Stratton had become irate with Mr. Warner because patrons would be unable to get cash when they needed it with individuals like this banned. I reported Mr. Stratton's comments to my director, Doug Morrison (who was then still working at Great Canadian). I am not aware whether any action was taken in response to this.

Beginning of Tenure as a BCLC Investigator

24. I applied to BCLC after I became a surveillance manager with Great Canadian because the prospects for further promotion at Great Canadian were limited.
25. I applied several times to be a BCLC auditor but was not successful. I then applied to be a BCLC investigator, but was not optimistic because I understood that all BCLC investigators were former police officers. Nevertheless, I was hired into the role in 2008.
26. My role as an investigator was casino investigations. I would review reports submitted by service provider staff through iTrak (a BCLC casino reporting system) as well as daily logs, which would track incidents and occurrences not significant enough to generate a report.
27. Based on my experience as a casino surveillance manager, I knew how incidents could be missed or reported incorrectly in the daily log (and not as a more detailed incident report) and so I would look for this type of reporting activity when I first joined BCLC.
28. Initially, I was assigned to Edgewater Casino, Hastings Racecourse, and Cascades Casino. Because of my surveillance background, I was also tasked with providing training on report writing and FINTRAC reporting to new casino staff.
29. When I was first hired, money laundering was not a focus of my investigations. Money laundering was not part of the reporting criteria at the time iTrak was developed. Loan sharking, however, was a concern. As betting limits increased, buy-ins increased and I observed that the "loan sharks" appeared to be lending more and more when I reviewed incident reports and surveillance footage. Based on my review of incident reports at this

time, I observed that the “loan sharks” appeared to be lending upwards of \$100,000 at a time.

30. I encountered suspected loan sharking activity at Edgewater. For a time, every chip passing incident was reported as loan sharking. This eventually led to over-reporting and a warning card system for chip passing was instead later implemented by BCLC. Patrons who were chip passing would receive a warning card, and after three warning cards, the patron would be suspended.
31. I saw little activity related to suspected money laundering or loan sharking at Hastings Racecourse, where there were no table games. My opinion is that it is not feasible to launder money through slot machines as it would take too long to feed large amounts of small denomination bills through a machine, as the slot machine would automatically lock and alert surveillance when that occurred.
32. Similarly, I saw little activity related to suspected money laundering or loan sharking at Cascades Casino, where there were fewer high limit players. I dealt primarily with public safety incidents at Cascades Casino (e.g., disorderly conduct).

River Rock Casino Resort (“River Rock”)

33. In or around March 2012, I was transferred from Edgewater to River Rock. At this time, it was not out of the ordinary to see two to three cash buy-ins of \$300,000 or \$400,000 per night at River Rock. These buy-ins seemed suspicious to me because of the amount of cash involved and the fact these transactions often contained small denominations and I and the other investigators assigned to River Rock reported them to our managers, FINTRAC, GPEB, and law enforcement as required.
34. I was assigned to River Rock with BCLC investigators Ross Alderson and Steve Beeksma.
35. I recall Great Canadian’s general manager of River Rock, Rick Duff, frequently complaining to me and other BCLC employees about BCLC’s loan sharking and other bans because he thought these bans were bad for business.

36. I recall Mr. Alderson investigating and interviewing a patron beginning in March 2012, who was buying in for up to \$100,000 with \$20s, hardly playing, and then cashing out and leaving. On or about April 4, 2012, this patron returned to River Rock, bought in for approximately \$100,000 with \$20s and wanted to leave after 30 minutes of play. Mr. Alderson instructed Great Canadian staff to pay him out in \$20s instead of a higher denomination.
37. I recall shortly after this incident Mr. Duff yelling at Mr. Alderson and telling him not to direct Mr. Duff's staff (I do not recall whether I was personally present or if I was informed of this by Mr. Alderson afterwards). I do not have notes of this particular event.
38. Attached as Exhibits "A", "B", and "C" are true copies of Incident Files #IN20120015337, #IN20120016413, and #IN20120016586, which documents these incidents involving this patron from March to April 2012 (BCLC0016470, BCLC0016471, and BCLC0016472).
39. At our next monthly BCLC investigators meeting on April 18, 2012, Mr. Alderson, Mr. Beeksma, and I were pulled out of the meeting by Gord Friesen, BCLC's Manager of Casino Investigations, and brought to Terry Towns' office. Mr. Towns, BCLC's Vice President of Corporate Compliance and Security, and Mr. Friesen were present along with Bryon Hodgkin, BCLC's Director of Corporate Security.
40. I recall Mr. Towns stating that he wanted to "get everyone on the same page" and that two high limit players passing chips is not commercial and therefore not suspicious. He also told myself, Mr. Alderson, and Mr. Beeksma that we were not police officers and to stop speaking to patrons. We were instructed that it was Great Canadian staff who should speak with patrons.
41. Mr. Towns never instructed us that it was not our job to investigate money laundering.
42. Afterwards, Mr. Alderson, Mr. Beeksma, and I had a separate conversation with Mr. Friesen where Mr. Friesen stated that while he agreed with what we were doing (i.e., interviewing patrons, passing out warning cards, and issuing bans), "this is political."

43. I made notes of this meeting shortly afterwards. Attached as Exhibit "D" are a true copy of my notes of this meeting (with redactions) (BCLC0016362 at 4-5). Attached as Exhibit "E" is a true copy of the agenda for the April 18, 2012 meeting that we were pulled out of to go see Mr. Towns (with redactions) (BCLC0016362 at 6). I note that this agenda contains a typo and that the meeting actually occurred in 2012, not 2011. Furthermore, I do not recall Mr. Towns presenting on chip passing, even though it was an agenda item. My recollection is that Mr. Towns stayed in his office during the meeting and Mr. Alderson, Mr. Beeksma, and I were pulled out halfway through the meeting.
44. This was the only instance I recall during my time at BCLC where I was told to back off on investigations.
45. Soon after this meeting, Mr. Alderson was promoted and transferred to BCLC's Vancouver office as Manager of eGaming Investigations, while Mr. Beeksma and I continued to be assigned to River Rock.

Paul Jin

46. On or around September 20, 2012, I initiated the first banning of Paul Jin, for 14 days.
47. Mr. Jin started as one of the "loan sharks". I was familiar with him from River Rock, and I recall that it seemed like he knew everyone in the casino. I noticed as I reviewed incidents not related to Mr. Jin that he was constantly in the background. Eventually, I noticed that Mr. Jin had a pattern of buying in and not cashing out and I began to suspect that he was lending chips and cash to patrons.
48. On or around September 26, 2012, Mr. Jin was barred for one year. Attached as Exhibit "F" is a true copy of the one year barring letter and notice of prohibition that were served on Mr. Jin (BCLC0012814-15).
49. About a week after he was barred, I recall reviewing an iTrak incident file about an unidentified male I later identified as Mr. Jin following someone in the Starlight Casino. Attached as Exhibit "G" is a true copy of Incident File #IN20120045514, which documents this incident (BCLC0016473).

50. On or around November 7, 2012, Mr. Jin was barred for five years. Attached as Exhibit "H" is a true copy of the five year barring letter that was served on Mr. Jin (BCLC0012816-17).
51. Mr. Jin owned a white Toyota Sienna, which was well-known to BCLC investigators. After the five-year ban was imposed, we would spot Mr. Jin's vehicle in casino parking lots delivering cash to patrons, both in person and on video. It was not always Mr. Jin conducting the deliveries personally. Mr. Jin had associates who would often drive and deliver cash for him. Because of this, his associates soon began receiving five-year bans from BCLC as well.
52. I recall another incident on or about February 27, 2015 where Maggie Chiu, a Gateway VIP host, and Bill Lang, who was in charge of Gateway's VIP program, met with Mr. Jin and others outside of the Starlight Casino. I became aware of this incident as I was tasked with reviewing incidents and surveillance footage at the Starlight Casino for that particular day. Attached as Exhibit "I" is a true copy of the incident report for this incident (BCLC0015449).
53. On or about April 10, 2015, I interviewed Mr. Lang with another BCLC investigator, Tom Caverly, about the February incident. Mr. Lang claimed that he had no idea what Mr. Jin looked like and would not know him if he was standing in front of him. Mr. Lang stated that he had met with these individuals to discuss investing in and expanding Gateway's VIP rooms and services. I was not able to interview Ms. Chiu because she was not available when I requested to meet with her and I was subsequently transferred to River Rock. Attached as Exhibit "J" are a true copy of my notes from my interview of Mr. Lang (with redactions) (BCLC0016362 at 70-71).
54. I believe that all of these incidents were communicated to GPEB.

Hard Rock Casino Vancouver ("Hard Rock")

55. I was transferred from River Rock to Hard Rock in 2014.

56. Hard Rock was significantly different from River Rock. The amount of cash and table play was significantly lower at Hard Rock than River Rock, as were the number of high limit players.

Changes after Mr. Towns' Retirement

57. I recall things changing at BCLC after Mr. Towns retired.
58. Mr. Alderson was promoted again to Director, AML & Investigations and he put ten of the biggest casino players in British Columbia on cash conditions. Attached as Exhibit "K" is a true copy of an email from Ross Alderson imposing these conditions (with redactions) (BCLC0008927-28).
59. Investigators were directed to start interviewing patrons. These interviews related to: (1) River Rock's outstanding chip liability and related chip swap; and (2) patrons being put on cash conditions.
60. I conducted the vast majority of patron interviews as part of the cash conditions program because most of the patrons interviewed speak Mandarin and I am fluent in Mandarin and can translate.
61. Before an interview, we would review the patron's history on iTrak and why the patron had been identified for an interview (e.g., chip passing, refusal to provide information, inability to verify source of wealth). Interviews were always conducted with two investigators present. An interview plan is drafted beforehand. The two investigators would then meet with the patron in a private setting at the casino. An interview summary, which was similar to an informal transcript of the interview, would then be prepared for our manager (Mr. Tottenham) for review. These summaries are then saved on a secured drive.
62. Some of the patrons I interviewed would tell me about what they described as an "underground banking system" used by some patrons. This system allowed patrons who had the means to play but could not get their money out of China to do so. My understanding of how this system worked, based on these interviews, is that patrons

would transfer money from a bank located in China to another Chinese account owned by the underground bank, and when the patron travelled to Canada, the underground bank would provide Canadian cash to the patron.

63. I observed that cash in casinos began to decline rapidly after 2015. I believe this was in part a result of BCLC's sourced cash conditions and patron interview programs. Due to these programs, the "loan sharks" were now unable to provide cash to high-limit patrons on sourced cash conditions that they can use in the casino as they were unable to provide bank receipts (from within 48 hours) for these funds. The same was true for unsourced chips – they were not usable by these patrons without verifying their source.

Money Services Businesses Investigation

64. On or about June 24, 2016, Mr. Beeksma and I were instructed by Mr. Tottenham to attend a money services business in Richmond to verify a cash receipt that had been provided by a patron. Attached as Exhibit "L" is a true copy of an email from Mr. Tottenham reporting on our findings (BCLC0004231).

Lisa Gao Investigation

65. On September 14, 2017, I reviewed an incident at River Rock that had occurred the night before involving Lisa Gao, a River Rock VIP Manager, where Ms. Gao assisted a patron with a \$200,000 cash buy-in and provided the patron with a velvet River Rock bag. The patron received 40 \$5,000 chips, placed all of them in the bag provided by Ms. Gao, and left the casino without placing a single bet. Attached as Exhibit "M" is a true copy of the incident report for this incident (GCGC124).
66. Mr. Beeksma and I were subsequently directed to interview Ms. Gao, who admitted that the individual who bought the chips had done so for a barred patron's associates. A GPEB investigation was launched afterwards, and Mr. Beeksma and I were interviewed as part of that investigation. Ms. Gao was eventually deregistered and terminated.

Source of Funds Threshold

67. BCLC's source of funds requirement threshold, which was established in January 2018, is the same as the LCT threshold (\$10,000).
68. I believe many patrons are not able to provide a receipt for their cash buy-in and thus try to buy-in below \$10,000 to avoid the source of funds threshold. I and other BCLC investigators report such attempts to avoid reporting to our managers, FINTRAC, GPEB, and law enforcement as required.
69. Reports with respect to source of funds issues now occupy a significant amount of my time. It is my belief that only a small percentage of these transactions are genuinely suspicious as many patrons do not have receipts to prove the source of their funds for various reasons. There is, in my opinion, a difference between someone who simply cannot provide a receipt for their \$10,000 cash buy-in because they misplaced it and someone who purposely tries to buy-in for under \$10,000 to avoid FINTRAC reporting.
70. Attached as Exhibits "N", "O", and "P" are true copies of incident reports that I have been involved in that were related to the source of funds threshold and that I determined were not suspicious in nature (BCLC0015876, BCLC0015880, BCLC0015883). I do not recall the events described in these incident reports.
71. If a player tries to buy-in with cash casino winnings, they have to do so within 48 hours of the casino disbursement and must buy-in at the same casino that made the disbursement, otherwise they cannot use the cash to buy-in.
72. To my knowledge, if all the proper policies and procedures are followed, it should not be possible for patrons to buy-in with cash and cash out for a verified win cheque in the same amount following minimal play without a verified win. In that scenario, the patron would be paid out in cash. At lower monetary levels, it might be possible for a patron to receive higher denomination bills, but not a verified win cheque. In all instances, a patron buying in for \$10,000 or more would have to provide the source of their cash funds before they would be allowed to play.

73. It is my belief that suspected dirty money was mostly eliminated from casinos five years ago, when the sourced cash conditions program was implemented.

SWORN BEFORE ME at Vancouver,
British Columbia, on 23/OCT/2020.

A commissioner for taking affidavits for
British Columbia

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STONE LEE

KENNETH LEUNG
Barrister & Solicitor
Hunter Litigation Chambers
Suite 2100 - 1040 West Georgia Street
Vancouver, BC V6E 4H1
Telephone: [REDACTED]
PERSONAL INFORMATION

THIS IS EXHIBIT “A” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20120015337**

Date/Time Occurred: Redacted - 6:47 PM
Day of Week Occurred: Redacted - RCMP
Date/Time Created: Redacted - 6:47 PM
Date/Time Closed: Redacted - 3:49 AM
Closed By: Iwan

Record Creation Details

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

Location of Incident

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident:

Daily Log #: DL20120289457
Type: Large Cash Transaction
Specific: Unusual Activity
Category:
Incident Status: Closed
Synopsis: m40 cd 19 cash counter used for 90k b/i (LCT 43841)
Checklist: - Section 86 Form
Redacted - FINTRAC

Narrative:	Created On	Created By	Modified On	Modified By
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Executive Brief:**Participants Involved:****Personnel**

Full Name: WAN, Louis Wai Ip	Property: River Rock (GCC)
Role: Documenter	Department: Surveillance

Subject

Full Name: Redacted -	Company: Redacted - RCMP
Role: Redacted - RCMP	

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120015337****Supplemental Entries:**SP20120039519 Attached by Iwan on [Redacted] - 22:22
[Redacted] - RCMPDescription Surveillance was informed by Cage of a large buy-in with small bills at CD 19 by [Redacted] -
[Redacted] - RCMP at 1845 hrs.

Review shows [Redacted] arrive in south parkade alone with a orange and brown bag (no vehicle info obtained) at 1841 hrs. He enters Salon Prive and cage lounge for buy-in at 1843 hrs. He empties the bag and puts bundles of various bills (later known as 600 x \$5K, 100 x \$20's, 1698 x \$50's & 1 x \$100 for a total of \$90K) on counter at CD 19. A buy in slip was brought to MDB 24 at 1852 hrs where [Redacted] was sitting at and he receives 10 x \$5K & 40 x \$1K in chips at 1854 hrs. He was seen talking to the dealer all the way until 1920 hrs without playing on MDB 24. He bets a couple of hands between 1920 & 1925 hrs. He was seen talking to the dealer again and leaves the table shortly twice but his chips were still on the table. He begins to play big at 2005 hrs with his \$5K chip.

Footage saved to X:\[Redacted]\other\12-15337.sdc

L WAN
25549

SP20120039774 Attached by ralderson on [Redacted] - 14:16

Description [Redacted] -
[Redacted] - RCMP

- 1310 hrs - Footage viewed and confirmed as accurate except denominations of bills which writer confirmed as:

300 x \$10 for \$3K
100 x \$20 for \$2K
1698 x \$50 for \$84,900
2 x \$100 for \$200

Total \$90,100.00

[Redacted] - RCMP is alone throughout process and writer reviewed his play until 2010 hrs and nothing suspicious was noted. The buy in is deemed suspicious due to the large amount of small bills used.

MORE TO FOLLOW: Requested further footage as Writer reviewed further LCT history for [Redacted]
[Redacted] for [Redacted] and discovered there was a buy in prior to this one with small bills. [Redacted] then cashed out soon after. Details on following JANKOVIC supplemental.

SP20120039807 Attached by djankovic on [Redacted] - 15:20

Description At approximately 1500hrs surveillance was informed of another buy in for [Redacted] - by BCLC ALDERSON that he wanted to be reviewed.
Buy in occurred at 1347hrs at MDB 24 and consisted of \$5, \$10 and \$20 bills.. Upon receiving chips at 1351hrs patron played few hands on the table and then decided to leave. He cashed out

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20120015337**SP20120039807 Attached by djankovic on [Redacted -
RCMP] 15:20SP2012003980
7 - Continued-

at CD 12 main cage at 1407hrs for 11K and received all \$100 bills for it. At 1411hrs he could be seen leaving the site via salon prive exit. It should be noted that he left 10K in chips at MDB 24 for which he returned at approximately 1845hrs and continued gaming.

Additional footage of this patron buying in at CD 19 saved into existing folder.

Dejan JANKOVIC
GPEB # 24617

SP20120040713 Attached by ralderson on [Redacted -
RCMP] 11:39

Description [Redacted] -

Summary:

[Redacted -
RCMP] Buy in and disbursement details for [Redact]. Details gained from LCT

- 1351 hrs at MDB 24 [Redact] receives chips for his \$19,985.00 K buy in. The buy in was conducted at Salon Prive Cash Cage just prior at approx 1340 hrs. The buy in consisted of \$16,740.00 in \$20 bills (837 x \$20) \$3,050 in \$10 bills (305 x \$10) and \$195 in \$5 bills (39 x \$5)
TOTAL \$19,985.00.

Upon receiving chips at 1351hrs [Redact] played a few hands on the table and then decided to leave. He left the Salon Prive, walked downstairs to the main cage (CD12) and cashed out at 1407hrs for 11K [Redact] received all \$100 bills for it. At 1411hrs he could be seen leaving the site via salon prive exit [Redact] left \$10K in \$1K chips at MDB 24 for which he returned at approximately 1845hrs and continued gaming with.

1841 hrs - [Redact] arrives in south parkade alone with a orange and brown bag (no vehicle info was able to be obtained) at 1841 hrs. He enters Salon Prive and cage lounge for buy-in at 1843 hrs.

300 x \$10 for \$3K
100 x \$20 for \$2K
1698 x \$50 for \$84,900
2 x \$100 for \$200

Total \$90,100.00

A buy in slip was brought to MDB 24 at 1852 hrs where [Redact] was sitting at and he receives 10 x \$5K & 40 x \$1K in chips at 1854 hrs. As per his previous buy in he also has \$10K in \$1K chips left on the table.

He bets a couple of hands between 1920 & 1925 hrs. He was seen talking to the dealer again and leaves the table shortly twice but his chips were still on the table. He begins to play big at 2005 hrs with his \$5K chip.

Reporting Party:	Supervisor:
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Incident File Full Report**Incident File #IN20120015337**

SP20120040713 Attached by ralderson on [Redacted] [Redacted - RCMP] 11:39

SP2012004071
3 - Continued-

[Redacted] is alone throughout process and writer reviewed his play until 2010 hrs and nothing suspicious was noted with his play on the second occasion however due to what occurred with first buy in writer will review further.

[Redacted] actions after his first buy in are highly suspicious. He came with small bills and instead of cashing out at the same cage he left the room and went downstairs to another cage to possibly avoid detection. He was given \$11K in \$100 bills however when he returned later that day he bought in using only 2 x \$100 bills. This behaviour is highly suspicious and is a high indicator of money laundering.

- 1445 hrs - Writer discussed this with BCLC KARLOVCEC.

- 1500 hrs - Call made to [Redacted] by writer. No answer. Voice mail left asking [Redacted] to contact Investigator.

[Redacted]

- 1224 hrs - Email to Surveillance manager requesting review of [Redacted] play between second buy in at 1855 hrs and cash out at 2100 hrs.

Details received and Writer reviewed [Redacted] play on [Redacted] which has been added to writer's supplemental on that date.

R.ALDERSON
BCLC SECURITY

SP20120040954 Attached by kighe on [Redacted] [Redacted] 00:32

Description Further review of [Redacted] play between 20:05 and 21:00 shows [Redacted] playing relatively minimally with an average of bet of \$1K. He occasionally makes a \$5K bet approximately 5 times during that hour of play. Also of note is the majority of hands were Dummy (free hands). At 21:00 [Redacted] approached CD 19 VIP Cage and cashes out.

Footage saved SDC [Redacted] other/12-15337 200-2100 play and cash out.

K. TIGHE 35680

SP20120041087 Attached by ralderson on [Redacted] [Redacted - RCMP] 08:57

Description [Redacted - RCMP]

Updated supplemental and comments noted regarding [Redacted] play. Extra footage was then viewed with following observations:

- 1334 hrs - [Redacted] arrives in Salon Prive with a pink/red plastic bag. He is alone and wearing a black jacket and brown trousers.
- He empties bag and it contains the \$19,985.00 which was initially documented as \$20K and paid to the player as \$20K. Buy in consisted of \$16,740.00 in \$20 bills, \$3050 in \$10 bills and \$195 in \$5 bills.

Reporting Party:	Supervisor:
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Incident File Full Report**Incident File #IN20120015337**SP20120041087 Attached by ralderson on [Redacted -
RCMP] 08:57SP2012004108
7 - Continued-

- 1351 hrs - He receives his chips at MDB24 as 20 x \$1K chips.
- Between 1351 hrs and 1357 hrs he is actively talking to the dealer and does not play a single hand although he receives a number of dummy hands.
- 1357:16 hrs Makes his first bet for \$2K which he loses. Down to \$18K.
- 1357:54 hrs - Makes a \$2K bet and wins. Back to \$20K.

[Redacted -
RCMP] then continues to talk to dealer and does not play any further hands. At 1401:36 hrs he gets up from table and he leaves \$9K in value chips on the table (9 X \$1K chips). He colours up the remaining \$11K (2 x \$5K chips and 1 x \$1K) and leaves the Salon prive. He walks down to the main floor of the Casino and at 1405:23 he cashes out the \$11K at the Main cash cage and receives \$11K in \$100 bills.

1407 hrs - [Redact] receives his cash from cage.
1409 hrs [Redact] goes back up to Salon Prive. Sits in lobby and makes a phone call, goes back to MDB 24 and takes his water bottle and then leaves the site. The 9 x \$1K chips are left on the table. [Redact] is off site for approx 4.5 hours.

Of that \$20K buy in [Redact] put \$4K at risk.

1843 hrs - [Redact] returns to site as previously documented. Conducts buy in.

300 x \$10 for \$3K
100 x \$20 for \$2K
1698 x \$50 for \$84,900
2 x \$100 for \$200

Total \$90,100.00 although documented by site as \$90K. Of note although he was paid \$11K in \$100 bills only 4.5 hrs earlier he chose not to use these as his buy in.

- 1853hrs [Redact] receives the value chips from his \$90K buy in
He receives 10 X \$5K chips and 40 X \$1K chips. Upon receipt of these chips [Redact] has the original \$9K in chips in front of him.

[Redact] organizes the \$90K received off to his right near the bumper of the table (he's playing alone). [Redact] puts the chips in stacks of 5 (8 X 5 X \$1K's and 2 X 5 X \$5K's) and begins to play with the \$9K chips from earlier. Of note [Redact] does not make his first bet until 1923 hrs, approx 30 mins after receiving his chips. Writer reviewed his play until he left the site. All play involved the original \$9K and his \$90K buy in was relatively untouched except on a couple of occasions which he takes some chips and then tops back up as writer notes later.

1923 hrs - 1st bet \$1500 approx. LOSE
1924 hrs - Bet \$1K WIN
1944 hrs - leaves table
1948 hrs - Back at table
1957 hrs - Leaves table

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120015337**SP20120041087 Attached by ralderson on [Redacted -
RCMP] 08:57SP2012004108
7 - Continued-

2004 hrs back at table
 2005:18 hrs - Makes \$1K bet LOSE
 2005:59 hrs - Makes \$1K bet WIN
 2006:45 hrs - Makes approx \$1100 bet LOSE
 2008:24 hrs Makes approx \$1100 bet LOSE
 2009:10 hrs - Makes \$1K bet LOSE
 2009:50 hrs - Makes a \$5-\$6K bet LOSE
 2010:26 hrs - Makes a \$5K bet WIN
 2012:59 hrs - Makes a \$2K bet WIN
 2013: 26 hrs - Makes a \$1K to \$2K bet WIN
 2015 hrs - Checks his stack off to side and looks like he is counting it.
 2016 hrs - Leaves table
 2017 hrs - Back to table with food. He still has his \$90K off to side and has approx \$15K in chips front of him in a totally separate pile.
 2022 hrs - Makes \$1K to \$2K bet WIN
 2024 hrs - Leaves table
 2025 hrs - Back at table
 2026 hrs - Leaves Table
 2031 hrs - Back at table
 2032:50 hrs - Makes a \$6K to \$7K bet. LOSE
 2033:50 hrs - Makes a \$5K bet. WIN
 2034:40 hrs - Makes a \$1K to \$2K bet LOSE
 2035 hrs - Leaves table. his balance is still the \$90K off to side and \$11K chips in front of him.
 2039:59 hrs Back at table and a new deck is cut.
 2040:25 hrs - Makes \$2K bet (TIE?)
 2041:06 hrs \$2K bet WIN
 2043 hrs - leaves table
 2047 hrs - Back at table
 2047:25 hrs - Makes \$1K to \$2k bet LOSE
 2048:10 hrs - Makes \$2-3K bet LOSE
 2049:34 hrs - Makes \$3K bet LOSE
 2050:23 hrs - Makes \$5K bet (At this time he has approx \$10K in front of him and the \$90K off to side) WIN
 2051:03 hrs - 1 x \$1K bet (takes from \$90K) WIN
 2052 hrs Leaves table for 30 seconds
 2053 hrs - Leaves table
 2055 hrs - Back at table
 2055 hrs - makes approx \$1,100 bet WIN
 2058 hrs - Colours up and cashes out for \$108,170.00 in which he receives \$100 bills.

As stated [Redact] does not touch the \$90K except for the following circumstances

- 2010 hrs [Redact] places a bet consisting of 2 X \$1K chips. He then retrieves what appears to be 3 X \$1K chips from his \$90K to bring the bet up to \$5K. He then returns the 3 X \$1K and takes 1 X \$5K which is bet and won. Once he receives the payout for the winning \$5K he replaces the 1 X

Reporting Party:**Supervisor:**

Incident File Full Report

Incident File #IN20120015337

SP20120041087 Attached by ralderson on [Redacted - RCMP] 08:57

SP2012004108
7 - Continued-

\$5K he'd taken from the \$90K and continues playing with the \$5K chip received from the payout and whatever smaller denomination chips received, already had.

- 2050 hrs [Redacted] has approx 2 X \$5K chips in front of him. He wagers 1 X \$5K on the next hand which wins. [Redacted] then removes 1 X \$1K chips from the \$90K which he uses to cover the commission on the winning \$5K Banker hand.

- 2051 hrs [Redacted] removes approx 3 X \$1K chips from his \$90K betting it.

- 2054 hrs [Redacted] has won a little and adds approx 3 X \$1K chips to his \$90K bringing it back up to an even \$90K.

- 2059hrs [Redacted] "colours up" 40 X \$1K chips and 2 X \$500 chips receiving 8 X \$5K chips and 1 X \$1K chip.

[Redacted - RCMP] only put \$7K of his \$90K buy in at risk.

SUMMARY:

Writer reviewed [Redacted] play extensively and he did not appear to be putting significant amounts at risk. Average bets were acceptable or normal amounts (\$1K to \$5K) however he wasn't betting regularly and clearly avoided having to use the \$90K he had set aside. [Redacted] was seen speaking with the dealer often, eating food, requesting "dummy Hands" etc. The hands per hour dealt was significantly less than what would be considered normal.

Additionally it appeared to the writer [Redacted] did not want to use the \$90K. On the few occasions he did it was out of necessity (he was low on chips) and as soon as he was able to; he replenished whatever he'd taken.

Writer spoke to BCLC BEEKSMA and asked to review footage of play as well to get a second opinion on the matter due to the patron being a high profile patron at RRCR. Writer has reviewed this patron's play a number of times due to similar concerns however his play has been enough to justify his buy ins in the past. However if the patrons history is disregarded, the fact of the matter is on [Redacted - RCMP] he bought in for approx \$110K in mixed small bills. He played 22 hands in approx 3 hours at the table and of the \$110K he put at risk a total of \$16K.

Adding to this the details surrounding his \$20K buy in earlier (buy in small bills, cashed out \$11K immediately at another cashier cage receiving \$100's), [Redacted - RCMP] behaviour this date is highly suspicious. Additionally having cashed out earlier receiving \$11K in \$100's and returning later to conduct a \$90K buy in small bills again adds to the suspicion that [Redacted] is displaying indicators of money laundering or "refining" whether it be for himself or, more likely for an unknown associate.

On [Redacted] writer contacted GPE BARBER to discuss and BARBER will attend RRCR on [Redacted]
[Redacted]

[Redacted] is a well known patron at RRCR who has a few odd gambling habits. He has been warned before about leaving chips behind and is known to cash out soon after a buy in if he does not feel

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120015337**

SP20120041087 Attached by ralderson on [Redacted - RCMP] 08:57

SP2012004108

7 - Continued-

lucky. On occasion he will then attend another site. Usually however he will buy in with whatever bills he receives and nothing as apparently blatant as what occurred on [Redacted]. He has been investigated before by BCLC Investigators including this writer and nothing suspicious was found with his play.

[Redacted - RCMP] has a total of \$12.2 million in buy in's. \$1.4 million of which have been bank drafts through a PGF account. His total cash outs minus buy's from his PGF total \$5.2 million. This would tend to indicate he has suffered mostly losses, not typical of someone who is trying to launder money. Of course this does not cover any chips he may have left with.

[Redacted - FINTRAC] On each occasion no issues relating to his play or possibly laundering small bills was reported. [Redact] received a 1 year BCLC barring in [Redact] for continued chip passing with fellow players. This was more about his disregard for Fintrac LCT reporting guidelines that suspected Loan sharking.

[Redacted - RCMP] has a [REDACTED] D/L (Canadian Resident). He gives his occupation as a [Redacted - RCMP]
[Redacted -] No info can be found on this company via internet searches.

As of [Redacted - RCMP] has not been back to RRCR since Writer voice mail. He has attended Edgewater Casino.

[Redacted - RCMP]
- 1330 hrs - GPE BARBER attended BCLC RRCR Office and writer provided him with a copy of this report and the matter was discussed. Writer suggested a joint interview with BCLC and GPE of [Redact] and the details of [Redacted - RCMP] put to him. Writer stated to BARBER he is of opinion that although this will be reported to Police [Redacted - FINTRAC] because of the buy in and that suspected money laundering has been identified as the suspected laundering had been identified "within the Casino" then there may be a responsibility to take action with the patron other than just reporting it. Writer believes the public expectation would be to do so and that without any further course of action by either BCLC or GPE then that may have an adverse public or media effect on RRCR, BCLC and GPE should the details of this case ever be made available through FOI or highlighted in a Fintrac audit. BARBER to discuss with GPE management and will contact writer [Redacted] with the GPE stance.

SP20120041276 Attached by sbeeksma on [Redacted - RCMP] 13:41

Description On the above date the writer was requested by BCLC ALDERSON to review [Redacted] play from the point of receiving chips from his second buy in this date (\$90K). [Redact] has been well documented as a regular VIP patron in BC Casinos however on this date he displayed more than one indicator of suspicious activity as it relates to money laundering (specifically refining smaller denomination cash into large denomination).
Because of [Redacted - RCMP] high profile patron status the writer concurred that a second set of eyes may be beneficial.

[Redacted - RCMP] had a \$20K buy in earlier this date (all \$20's \$10's and \$5 bills occurring in the 3rd floor VIP salon). Following this earlier buy in [Redacted] takes \$11K of the chips received and cashes out at the main cage being paid out in \$100 bills. He leaves \$9K in value chips on the table (9 X \$1K chips) and leaves the site for approx 4 hours.

Reporting Party:**Supervisor:**

Incident File Full ReportIncident File #IN20120015337

SP20120041276 Attached by sbeeksma on [Redacted] 13:41

SP2012004127

6 - Continued-

The following observations were made by the writer from the point of [Redacted] return:

-At approx 1853hrs [Redacted] receives the value chips from his \$90K buy in (cash tendered was a combination of CDN \$50, \$20 and \$10 bills and 2 X \$100).

He receives 10 X \$5K chips and 40 X \$1K chips. Upon receipt of these chips [Redacted] has approx \$9K in chips in front of him (likely the a/m chips from his earlier buy in) that he'd likely been gambling with while cashiers counted the \$90K. The \$90K in chips were never mixed with

[Redacted] [Redacted] existing chips.

[Redacted] [Redacted] organizes the \$90K received off to his right near the bumper of the table (he's playing alone). [Redacted] puts the chips in stacks of 5 (8 X 5 X \$1K's and 2 X 5 X \$5K's) and begins to play with the chips from earlier, leaving the \$90K relatively untouched with a couple exceptions.

-At approx 2010hrs [Redacted] places a bet consisting of 2 X \$1K chips. He then retrieves what appears to be 3 X \$1K chips from his \$90K to bring the bet up to \$5K. He then returns the 3 X \$1K and takes 1 X \$5K which is bet and won. Once he receives the payout for the winning \$5K he replaces the 1 X \$5K he'd taken from the \$90K and continues playing with the \$5K chip received from the payout and whatever smaller denomination chips received, already had.

-At approx 2050hrs [Redacted] has approx 2 X \$5K chips in front of him. He wagers 1 X \$5K on the next hand which wins. [Redacted] then removes 1 X \$1K chips from the \$90K which he uses to cover the commission on the winning \$5K Banker hand.

-At approx 2051hrs [Redacted] removes approx 3 X \$1K chips from his \$90K betting it.

-By approx 2054hrs [Redacted] has won a little and adds approx 3 X \$1K chips to his \$90K bringing it back up to an even \$90K.

-At approx 2059hrs [Redacted] "colours up" 40 X \$1K chips and 2 X \$500 chips receiving 8 X \$5K chips and 1 X \$1K chip.

[Redacted] then cashes out for \$108,170 being paid out in cash (\$100 bills).

Conclusion:

Of the approx 2 hours of [Redacted] play reviewed he did not appear to be putting significant amounts at risk. Average bets were acceptable or normal amounts (\$1K to \$5K) however he wasn't betting regularly and clearly avoided having to use the \$90K he had set aside. [Redacted] was seen speaking with the dealer often, eating food, requesting "dummy Hands" etc. The hands per hour dealt was significantly less than average.

Additionally it appeared to the writer [Redacted] did not want to use the \$90K. On the few occasions he did it was out of necessity (he was low on chips) and as soon as he was able to; he replenished whatever he'd taken.

Adding to this the details surrounding his \$20K buy in earlier (buy in small bills, cashed out \$11K immediately at another cashier cage receiving \$100's) [Redacted] behaviour this date is highly suspicious. Additionally having cashed out earlier receiving \$11K in \$100's and returning later to

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120015337**SP20120041276 Attached by sbeeksma on [Redacted -
RCMP] 13:41SP2012004127
6 - Continued-

conduct a \$90K buy in (a combination of CDN \$50, \$20 and \$10 bills and 2 X 100) adds to the suspicion that [Redacted] is displaying indicators of money laundering or "refining" whether it be for himself or, more likely for an unknown associate.

Above details passed on to BCLC's ALDERSON to assist in concluding this file.

S.BEEKSMA

BCLC

Casino Investigations

SP20120041871 Attached by ralderson on [Redacted -
RCMP] 16:03

Description Redacted - FINTRAC Copy to IPOC and GPE BARBER and KIRKLAND. Saved under x: Money laundering folder

SP20120042371 Attached by djankovic on [Redacted -
RCMP] 17:34

Description Evidence cabinet opened in order to burn the copy of the incident for GPEB BARBER. DVD # 1057/1058 burned and sealed in a evidence bag # NN1770942 for BARBER's future pick up.

Dejan JANKOVIC

GPEB # 24617

SP20120045576 Attached by djankovic on [Redacted -
RCMP] 13:45

Description DVD's Picked up by BARBER.

Dejan JANKOVIC

GPEB # 24617

Reporting Party:

Supervisor:

THIS IS EXHIBIT “B” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20120016413**

Date/Time Occurred: [Redacted] 00 PM
Day of Week Occurred: Redacted -
Date/Time Created: RCMP 16 PM
Date/Time Closed: 48 AM
Closed By: dtrajkovic

Record Creation Details

Department: Gaming Operations
Owner: annchu
Operator ID: sroddick
Operator Name:
Personnel ID:
Card Number:
Job Position:
Secondary Operator:

Location of Incident

Property: River Rock (GCC)
Location: Back of House-River Rock (GCC)
Sublocation: VIP Cash Cage

Details of Incident

Daily Log #: DL20120309115
Type: Large Cash Transaction
Specific: Unusual Activity
Category:
Incident Status: Closed
Synopsis: C/S Nolan - \$ 100K B/I (\$ 20e). SID 43841 to MDB 23. M 29
Checklist: - Section 86 Form
[Redacted - EINTRAC]

Narrative:	Created On	Created By	Modified On	Modified By
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Executive Brief:**Participants Involved:****Personnel**

Full Name: DEMPSEY, Jack D.	Property: River Rock (GCC)
Role: Documenter	Department: Surveillance

Subject

Full Name: Redacted -	Company: Redacted - RCMP
Role: RCMP	

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20120016413****Supplemental Entries:**

SP20120042261 Attached by jdempsey on [Redacted - RCMP] 13:46

Description [Redacted - RCMP] bought in \$99,980 with 9999 \$20 bills at CD 19 and received his chips on MDB 23. He was playing an average bet of approx \$4,000 until BCLC investigator Ross ALDERSON interviewed him at MDB 15 private room. After the interview [Redacted - RCMP] left \$103,900 in chips on MDB 23 then left the casino.

12:46 Enter S-PLOT in a White SUV

12:47 Enter Salon room then CD 19

12:59 Buy in started

13:17 Receive chips at MDB 23

13:47 F/M Oscar and VIP Host Clara CHAN escorted Chang to MDB 15 private room for interview

Saved to X: April / Other.

J.DEMPSEY 23874

SP20120042286 Attached by ralderson on [Redacted - RCMP] 14:37

Description Incident noted.

1330 hrs - GPEB BARBER attended BCLC office to discuss a time to interview [Redact] re his buy in on [Redacted] which had been a file reviewed by GPE. It was then noted that [Redact] was on site. ALDERSON attended Salon Prive and discussed with A/G/M Daniel LAY that writer would like a quick word with [Redact] to arrange another appointment. It was made clear that [Redact] was allowed to further gamble once that had taken place.

1345 hrs - [Redact] attended private room in Salon Prive on request from GPEB BARBER and BCLC ALDERSON. ALDERSON asked [Redact] if he would be available to attend an interview at BCLC Vancouver Office. [Redact] was under impression that he was to be interviewed that day and could not do so because he had to leave by 2 pm. ALDERSON stated to [Redact] that he did not wish to take up too much of his time and that today he was free to gamble as long as he wanted. ALDERSON stated that he wished to discuss events of [Redacted - RCMP] with [Redact] and [Redact]. [Redact] agreed to attend BCLC Vancouver Office at 10 am on Thursday [Redacted - RCMP] Guest Services translated. ALDERSON asked [Redact] if he had a phone number he could be contacted on as the number on file appeared to be a wrong number. [Redact] stated he did not and looked at his watch and said he had to leave as it was close to 2pm. ALDERSON thanked him for his time and stated he would see him tomorrow.

ALDERSON then left Salon Prive. On return to the Office GPE BARBER, BCLC LEE and BCLC BEEKSMA were reviewing live monitoring of the Salon Prive cash cage where [Redact] was now cashing out. It appeared the cage were going to pay back his buy in with \$100 bills. ALDERSON called Surveillance and requested he be paid back his buy in with \$20 bills due to money laundering concerns stemming from the [Redacted - RCMP] incident.

ALDERSON was referred to G/M DUFF and a phone conversation took place. By that time [Redact] had left site leaving approx \$110K of chips on the table. As a result A/G/M LAY stated to ALDERSON that should [Redact] return he will be paid back his original buy in with \$20 bills.

ALDERSON finds it unusual that [Redact] volunteered he had to leave by 2 pm (which he repeated

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20120016413**SP20120042286 Attached by ralderson on [Redacted -
RCMP] 14:37SP2012004228
6 - Continued-

a number of times) when he only just bought in for a \$100K. ALDERSON notes the supplemental from DEMPSEY regarding his play and the play was also observed by BCLC BEEKSMA and LEE.
A full review of his play has been requested.

SP20120042287 Attached by dlay on [Redacted -
RCMP] 14:56

Description The writer spoke with BCLC Investigator Ross ALDERSON in regards to interviewing [Redacted]
[Redacted] A private room was provided and F/M Oscar CHOW and VIP Host Clara CHAN
escorted [Redacted -
RCMP] to the room and were present for translation. I was then later informed that [Redacted -
RCMP] was at the Salon cage to cash out. It was decided that [Redacted -
RCMP] was to be paid in twenty dollar bills as consistent with his original buy in of \$99,980 in 20's. As [Redacted -
RCMP] had left the room leaving \$103,980 in chips on MDB23 the writer instructed the cage that [Redacted -
RCMP] when returning was to be paid the first \$100K in twenty's whenever he proceeded with his cash out.

Daniel LAY
#21619
Assistant General Manager

SP20120042548 Attached by dtrajkovic on [Redacted -
RCMP] 01:35

Description On [Redacted] at approx. 00:35 [Redacted -
RCMP] was cashing out 31x\$5,000, 4x\$1,000, 4x\$100 and 2x\$25 for a total of \$159,450. He requested cheque for \$59,450 verified win and the rest was paid in \$20 bills and CD 19. He collected cash and cheque and left the site. Video saved in 12-16413 in Other folder.

Djordje TRAJKOVIC
23474

SP20120042730 Attached by ralderson on [Redacted -
RCMP] 12:57**Description** [Redacted - RCMP]

Received update from BCLC LEE regarding [Redacted] play between 1315 and 1400 hrs. Meeting conducted with [Redacted] at BCLC Vancouver Office this date at approx 0915 hrs. GPE BARBER [Redacted -
ed.] present. [Redacted -
ed.] confirmed his current personal details including address and occupation. All other details in BCLC only file opened this date by writer. [Redacted -
ed.] requested that the content of his meeting be not disclosed to Casino personnel.

[Redacted - FINTRAC]

R.ALDERSON
BCLC SECURITY

SP20120042765 Attached by stolee on [Redacted -
RCMP] 14:24

Description On [Redacted -
RCMP] writer attended surveillance, met with supervisor Jack DEMPSEY and reviewed [Redacted -
RCMP] play.
Detail findings has been documented in a BCLC file.

Stone LEE

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120016413**

SP20120042765 Attached by stolee on [Redacted] 14:24

SP2012004276
5 - Continued-**BCLC Investigator**

SP20120044840 Attached by raiderson on [Redacted] 15:45

Description [Redacted - FINTRAC] submitted this date. Copy to IPOC and GPE.

Reporting Party:**Supervisor:**

THIS IS EXHIBIT “ C ” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20120016586**

Data/Time Occurred:  1:01 PM
Day of Week Occurred: Redacted - RCMP
Data/Time Created:  1:02 PM
Data/Time Closed:  2:51 PM
Closed By: ralderson

Record Creation Details

Department: BCCLC Corporate Security
Owner: ralderson
Operator ID: ralderson
Operator Name:
Personnel ID:
Card Number:
Job Position:
Secondary Operator:

Location of Incident

Property: Vancouver (BCLC)
Location: Corporate Security BCCLC Vancouver
Sublocation:

Details of Incident:

Daily Log #: DL20120312463

Type: Assistance To

Specific: BCCLC

Category:

Incident Status: Closed

Synopsis:

Checklist:

Narrative:	Created On	Created By	Modified On	Modified By
	 1:02 PM	ralderson		
Interview of 				

Executive Brief:



Incident File Full Report**Incident File #IN20120016586****Participants Involved:****Personnel**

Full Name:	ALDERSON, Ross	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	Security
Full Name:	WU, Nicole	Property:	Vancouver (BCLC)
Role:	Witness	Department:	Security

Subject

Full Name:	Redacted -	Company:	Redacted - RCMP
Role:	RCMP		

Supplemental Entries:

SP20120042733 Attached by alderson on Redacted - RCMP 13:06

Description Redacted - RCMP -

As per narrative on Patrons previous incident from Redacted - RCMP

Redacted - RCMP

1330 hrs - GPEB BARBER attended BCLC office at RRCR to discuss a time to interview Redact re: his buy in's and subsequent cash outs of \$110K on Redacted - RCMP which had been a file reviewed by GPE Redacted - FINTRAC Redacted - BARBER stated that the RCMP had shown interest and they had no issue with BCLC and GPE interviewing Redact over the incidents of Redact Writer attempted to call Redact however phone number on file appeared to be a wrong number.

It was then noted that Redact was on site. ALDERSON attended Salon Prive and discussed with A/G/M Daniel LAY that writer would like a quick word with Redact to arrange another appointment at the BCLC office. It was confirmed that G/M DUFF was not on site. It was made clear to LAY that Redact was allowed to further gamble once arrangements had been made however writer detailed it was related to suspected money laundering which occurred on Redacted.

1345 hrs - Redact attended one of the private rooms in Salon Prive on request from BCLC ALDERSON. GPE BARBER and BCLC BEEKSMA and BCLC LEE observed on live monitoring

ALDERSON asked Redact if he would be available to attend an interview at BCLC Vancouver Office. Redact was under impression that he was to be interviewed that day and could not do so because he had to leave by 2 pm. ALDERSON stated to Redact that he did not wish to take up too much of his time and that today he was free to gamble as long as he wanted. Redact reiterated that he had to leave by 2 pm.

ALDERSON stated that he wished to discuss events of Redact with Redact and Redact agreed to attend BCLC Vancouver Office at 10 am on Thursday Redacted Guest Services translated. ALDERSON asked Redact if he had a phone number he could be contacted on as the

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120016586**SP20120042733 Attached by alderson on [Redacted -
RCMP] 13:06

SP2012004273

3 - Continued-

number on file appeared to be a wrong number. [Redact ed.] stated he did not wish to provide that and looked at his watch and said he had to leave as it was close to 2pm. ALDERSON thanked him for his time and stated he would see him tomorrow.

ALDERSON then left Salon Prive. On return to the Office GPE BARBER, BCLC LEE and BCLC BEEKSMA were reviewing live monitoring of the Salon Prive cash cage where [Redact] was now cashing out. It appeared the cage were going to pay back his buy in with \$100 bills. ALDERSON called Surveillance and requested he be paid back his buy in with \$20 bills due to money laundering concerns stemming from the [Redacted RCMP] incident.

1405 hrs - ALDERSON was referred to G/M DUFF and a phone conversation took place. By that time [Redact] had left site leaving approx \$110K of chips on the table. As a result A/G/M LAY stated to ALDERSON that should [Redact ed.] return he will be paid back his original buy in with \$20 bills.

ALDERSON finds it extremely unusual that [Redact ed.] volunteered he had to leave by 2 pm (which he repeated a number of times) when he only just bought in 30 minutes prior for a \$100K. A full review of his play was requested and viewed by BCLC STONE that confirmed [Redact ed.] of his \$100K buy in, had wagered 8 hands with the highest being a \$1,200 bet. This totally conflicts what RRCR Surveillance shift manager DEMPSEY had initially stated to writer that [Redact] was consistently playing with \$4K bets. It is not known if DEMPSEY was intentionally attempting to mislead ALDERSON or did not correctly view the footage.

From the incident it is clear to this writer that there is resistance from the site to the way BCLC ALDERSON has dealt with this matter and this was emphasized by G/M DUFF in what was a rather heated phone call with writer.

DUFF's comments were:

- " He's my player and he was playing until you pulled him off the table and scared him away"
- "This is my Casino not yours and if I want to pay him back in \$100's or a cheque, I will."
- " You have no right to tell my staff to pay him back in \$20's"
- " I want to know what is going on with my players"
- " I thought your job was to report this and let the real police investigate"

My responses were

I told DUFF to pay [Redact ed.] how he liked and I would note it down in the file.
I told DUFF that my job was to investigate incidents within the Casino and we have had similar reported incidents where \$20's had been returned however as this was a big player the site appeared to disregard that. I told DUFF that any discussion I had with [Redact ed.] was on a need to know basis and I did not have to disclose a joint GPE and BCLC investigation to him (DUFF).
I informed DUFF that [Redact ed.] volunteered he was leaving at 2 pm, bought in for \$100K in \$20's played minimally and now wanted to cash out and get \$100's. This looks like Money laundering and is exactly the issue I wished to discuss with him at a later date. If the site wanted to assist [Redacted] in his money laundering then that was his call as he had made it clear he ran the Casino. I made it clear that I believed the site was failing it's AML requirements today and that it was becoming a theme that BCLC Investigators were finding these issues on review and not getting

Reporting Party:	Supervisor:
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Incident File Full Report**Incident File #IN20120016586**

SP20120042733 Attached by ralderson on [Redacted - RCMP] 13:06

SP2012004273

3 - Continued-

reports from Surveillance Operators or floor staff.

I also told DUFF I had no option other than to speak to the patron while in the Casino as the contact phone number he provided was incorrect. GPE had also indicated there were 3 other numbers on file which [Redacted] had told me were also out of date.

By the end of the call DUFF stated if I believed he was attempting to launder money then he will support me and pay him back with \$20's. We agreed to discuss next week after the Easter break.

BCLC LEE, BCLC BEEKSMA and GPE BARBER were present in the room at the time of that call.

Notes of that phone call were taken in Writers day book.

1425 hrs - Writer called BCLC KARLOVCEC to brief.

1428 hrs - Called Nicole WU and confirmed she would be available tomorrow to translate in Mandarin for the interview.

[Redacted - RCMP]

- 0900 hrs - Writer attended Vancouver Office and met with GPE BARBER and discussed interview plan. It was decided that BCLC ALDERSON would start with questions he had prepared and BARBER would finish off.

- 0915 hrs - [Redacted] arrived and writer met same in lobby and introduced BARBER and WU. Interview was the conducted in one of the prize winners lounges. With [Redacted - RCMP] permission the interview was audio taped on writers iPad.

Content of interview will be on a the next supplemental.

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

Description [Redacted - RCMP]

Interview conducted with [Redacted - RCMP] Persons present [Redacted] BCLC ALDERSON, GPE BARBER and Mandarin Interpreter BCLC Nicole WU.

SUMMARY OF INTERVIEW conducted between 0915 hrs and 1030 hrs

[Redacted - RCMP] was asked to justify his play (or lack of on [Redacted - RCMP]) and also why he bought in with small bills on that day and when he returned on [Redacted]

[Redacted - RCMP] made following statements during the interview.

[Redacted - RCMP] - Once I spoke to him several members of RRCR staff came up to him wanting to know what we discussed.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120016586

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

SP2012004275

2 - Continued-

[Redacted] bought in for \$20 because he only wanted to play a short time. (He initially couldn't remember what time he arrived and how much he bought in for) He left \$9K behind as 9 is a lucky number in Chinese culture. Its "feng Shuai" He left with the rest (\$11K) as they were his winnings (even though they were not) He received \$100 bills as RRCR always pays out in \$100's. It was not his intent to get rid of his small bills as far as he is concerned it is all money and he would be ok being paid back in \$20's. He couldn't remember how much he played with. He then came back with \$90K in small bills [Redacted] stated he thought it was only \$30k) He was asked why he didn't use his \$100 bills from earlier and he stated again that he stores his \$100's as it is "lucky money" as he got it from Casino. He stated he stored his \$100 bills at home.

When I asked him how much of that \$90K he bet with he said about \$30K and I confirmed with him it was only \$7K.

He was asked why he hardly touched his \$90K buy in and [Redacted - RCMP] answer was he wanted to have it there as his safety net and he would have used it if he needed it. Writer queried why he bought in when he could have waited and [Redacted] answer was again that he thought it was lucky to have the chips beside him. He then stated he was born in the year of the rabbit and it was lucky for him to bet with totals with 9 such as \$9K and \$90K. I asked him why he only played 22 hands in 2.5 hours and he stated he lost a lot the other day and wanted to minimize his losses. He confirmed he cashed out for approx \$110K (in total) on [Redacted - RCMP] and that he "stored that money" and used other money to buy in with. [Redacted] stated he did not use his PGF account as he had a bad experience at RRCR where he believed he should have got more from his PGF and that cash is easier to deal with.

He stated he was not [Redacted - RCMP] and that he mainly lived in China (although [Redacted - RCMP] states he gets his cash from the associates he trades with in China. If he needs money there they arrange that or he gives them goods and he then gets money in return in BC. He says he was China a lot of last year until [Redacted] when he came back to BC. [Redacted] states he gets smaller bills from his associates as they are harder to counterfeit compared to \$100 bills and he doesn't mind the inconvenience of the small bills.

Writer then asked [Redacted] if he knew what money Laundering was and he rambled on for some time that what he was doing was not illegal and it was all money and that RRCR always paid back in \$100 bills whereas other sites did not. He stated he was not money laundering on behalf of anyone else and that all his buy ins' were his money. He confirmed his address as [Redacted - RCMP] [Redacted - RCMP] He was adamant he did not want Casino staff knowing where he lived.

GPE Investigator Rob BARBER then asked further questions relating to the origin of the money and [Redacted] stated the following.

There was only a few persons he dealt with. They were all Chinese and he originally had found them through a Chinese Website: Vansky.com. There was no interest rate and he paid back with bank transfers etc.

The persons he deals with he trusts because he calls them and they meet at a mutual location. Never at their homes or his and the exchange takes place [Redacted] stated sometimes T and T supermarket at Yaohan Centre in Richmond or more commonly the McDonalds Restaurant at

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120016586**

SP20120042752 Attached by ralderson on [Redacted - RCMP] 13:47

SP2012004275

2 - Continued-

Metro town in Burnaby. He didn't believe this was suspicious and the origin of the money was sound due to the process, eg if they didn't negotiate the price etc. This contradicts what he earlier said about interest rates. He also mentioned cash transfers in China which he also contradicted by talking about bank transfers. [Redacted] stated he had his own banking system with separate storage for his \$100 bills ("casino winnings") and his cash he got from "associates"

[Redacted - RCMP] confirmed he had a [Redacted - RCMP] address which he didn't live in but was there as he wanted to [Redacted - RCMP] and needed to be a resident to do so.

Writer then asked if anyone from RRCR assisted him in obtaining monies and he said no. The G/M's name Rick DUFF was mentioned and the patron denied knowing him. This is unrealistic as DUFF would have comped him dinners etc.

Through the interview [Redacted - RCMP] was quite nervy, contradicted himself a number of times and most of his explanations regarding his playing patterns were not credible. However [Redacted] never admitted to purposely laundering his money. He stated that he was happy to receive back the same bills he bought in with. Of interest [Redacted] has LCT's for [Redacted - RCMP] whereas he stated he was in China until [Redacted]. Once he knew what was being implicated it was interesting that he closed up entirely over staff at RRCR who had asked him about our conversation on [Redacted - RCMP] at RRCR.

Writer reviewed www.vansky.com and it is a Chinese News website with a Classified section. However it is written in all simplified Mainland China characters.

Writer located a Vansky Trading Co Ltd, suite 4 1600 Valmont Way, Richmond, BC V6V 1Y4. Ph 604-232-1155. This location is approx 5 mins from RRCR. It does not have a website however canpages states it is a grocery trader/importing company.

Of note [Redacted - RCMP] was back at RRCR on [Redacted] and bought in for \$30K only. Denominations not known.

[Redacted - FINTRAC]

Writer has provided Details of this file to BCLC KARLOVCEC on [Redacted - RCMP]. Writer is concerned that RRCR management have taken it upon themselves to pay back "high Profile" patrons in \$100 bills with minimal play and are compromising AML and integrity concerns. Throughout this entire process whether it be lack of reporting, inaccurate Surveillance supplementals or the combative nature of the G/M there have been concerns to this writer about the goings on at RRCR especially in the Salon prive. Writer followed up with KARLOVCEC re gaining a video review station for BCLC which KARLOVCEC stated he would continue to follow up with GCC Surveillance Director Pat ENNIS.

Reporting Party:

Supervisor:

Incident File Full ReportIncident File #IN20120016586SP20120042752 Attached by raiderson on [Redacted - RCMP] 13:47

SP2012004275

2 - Continued-

[Redacted - RCMP] - 1630 hrs - Writer drove by Vaneky Trading. Appears to be small warehouse.

Nothing suspicious noted.

SP20120042774 Attached by stolee on [Redacted - RCMP] 14:50

Description On [Redacted - RCMP] writer attended surveillance, met with supervisor Jack DEMPSEY and reviewed [REDACTED] play. Surveillance footage showed on the gaming date of [Redacted] at 1316:30 hrs patron identified as [Redacted - RCMP] arrived at MDB23. At 1318:42 hrs [Redacted - RCMP] received 18x \$5,000 chips, 9x \$1,000 chips, 1x \$500 chip, 4x \$100 chips, 3x \$25 chips, and 1x \$5 chip for total of \$99,980 in gaming chips from the dealer. [Redacted] was seen wagering total of 8 hands during his play, detail of [Redacted] play as follow:
 At 1319:58 hrs [Redacted] was seen wagering approximately \$1,000 on BANKER and lost.
 At 1320 hrs [Redacted] was seen wagering \$100 on BANKER and lost.
 At 1321:18 hrs [Redacted] was seen wagering \$1,500 on BANKER and won.
 At 1332:50 hrs [Redacted - RCMP] was seen wagering \$1,100 on PLAYER and won.
 At 1334:47 hrs [Redacted - RCMP] was seen wagering \$1,100 on PLAYER and won.
 At 1340:40 hrs [Redacted] was seen wagering \$1,100 on PLAYER and the hand resulted in a TIE, [Redacted - RCMP] pushed this hand.
 At 1341:23 hrs [Redacted] was seen wagering \$1,200 on PLAYER and won.
 At 1345:20 hrs [Redacted - RCMP] was seen wagering \$1,200 on PLAYER and won.
 At 13:47 hrs [Redacted] was spoken to by F/M CHOW.
 When [Redacted] returned to the table he took his chips to the cage.

Stone LEE

BCLC Investigator

Reporting Party:

Supervisor:

THIS IS EXHIBIT “D” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

4 2012 [REDACTED] APR 13 2012
 XED [REDACTED] 0900 ARRIVED AT RRCR, NOTED INC # 17788, REVIEWED
 JANKOVIC [REDACTED] LCTRS OFF SITE 1600 HRS
 Redacted - FINTRAC

5 2012 [REDACTED] APR 16 2012
 KCE [REDACTED] 0930 ARRIVED AT RRCR, NOTED INC # 17894, # 18302,
 REVIEWED SURVEILLANCE, MET WITH SHIFT MANAGER GLEN
 WORNER AND REVIEWED INC# 17894, #18302 AND #17788.
 Redacted - FINTRAC

4 2012 [REDACTED] APR 17 2012
 DOCUMENTED [REDACTED] 0900 ARRIVED AT RRCR, REVIEWED LCTRS AND FINTRAC
 TERS [REDACTED] INCIDENTS. OFF SITE 1600 HRS.

10 2012 [REDACTED] APR 18 2012
 XOTED [REDACTED] 0900 ARRIVED AT RRCR. MET WITH IPOC MEMBERS.
 JCE, [REDACTED] ARRIVED AT H/O FOR MONTHLY INVESTIGATOR
 REVIEWED [REDACTED] MEETING, COULD PULL STEVE BECKSMA, ROSS
 Redacted - FINTRAC [REDACTED] ALDERSON AND WRITER AWAY TO MEET WITH
 615 HRS. [REDACTED] VP TERRY TOWNS AND BRYON HODGKIN IN
 TERRY'S OFFICE. TERRY WANTED TO DISCUSS
 CHIP PASSING INCIDENTS AT RRCR, TERRY
 STATED TO US THAT HE WANTED TO MAKE
 SURE WE'RE ON THE SAME PAGE, TERRY
 STATED HE HAS BEEN APPROACHED BY BEEN ADVISED
 BY GCC ROD BAKER THAT BCLC INVESTIGATORS
 AT RRCR HAS BEEN BARRING VIP PLAYERS IN
 THE SALON. TERRY STATED THAT WE AS
 INVESTIGATORS SHOULD NOT APPROACH PLANE
 MAKZ AND CONTACT [REDACTED] WITH THE PLAYERS WHEN
 INVESTIGATING AN INCIDENT. TERRY STATED

Date APR 19 2012

WHEN VIP PLAYERS ARE PLAYING IN THE SALON
AND CHIP PASSES TO ONE EACH OTHER IS
NOT "COMMERCIAL" THEREFOR NOT SUSPICIOUS.
AND NO WARNING CARD SHOULD BE ISSUED.

TERRY STATED WE'RE ONLY TO REPORT
AND NOT CONTACT PLAYERS. ROSS ASKED
IF WE ~~BEST~~ CAN'T ASK PLAYER QUESTIONS
THEN HOW WE SUPPOSE TO KNOW WHAT IS
THE RELATIONS BETWEEN THE CHIP PASSERS?

GORD STATED TO GET THE SERVER
PROVIDER TO INTERVIEW THE PATRONS.

*IT IS MY UNDERSTANDING THAT WE'RE
BEING TOLD TO BACK OFF BY OUR MANAGEMENT.
~~REED~~ RETURNED BACK TO THE MEETING
AND WHEN MEETING OVER STEVE, ROSS
STONE AND GORD HAD CONVERSATIONS
REGARDING WHAT WAS DISCUSSED IN
TERRY'S OFFICE (GORD STATED) THAT
HE AGREES WITH WHAT WE'RE DOING
BUT THIS IS POLITICAL AND WHAT YOU
GONNA DO? RETURNED TO RRCR
CFF SITE 1500 HRS.

APR 19 2012

0900 ARRIVED AT RRCR. REVIEWED LTRS.
CFF SITE 1600 HRS.

APR 20 2012

SICK DAY

7

Page

THIS IS EXHIBIT “E” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

AGENDA

Meeting Title: Casino Security Investigators Meeting

Date: Wednesday Apr 18, 2011
Time: : 10:00 – 12:30
Location: VAN R5, KAM – Security Back Room, Teleconference

#	Item	Presented
1	Chip Passing	Terry Towns
2	Merit Increases Update General Updates	Gord Friesen
3	General Updates	John Karlovcec
4	Unprocessed LCT's	Daryl Tottenham
5	Group Updates	All

Conference Name: PRASAD LYN

Redacted - Relevance

Number of participants: 110 (including Moderator)

Access codes:

Participant Access code: Redacted - Relevance

Dial-in Phone Numbers:

Redacted - Relevance

THIS IS EXHIBIT “F” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.



September 26, 2012

REGISTERED LETTER

Paul King JIN

PERSONAL INFORMATION

Dear Mr.JIN:

The British Columbia Lottery Corporation is responsible for the conduct, management, and operation of gaming in British Columbia, including Casinos, Community Gaming Centres and Commercial Bingo Halls.

On September 19, 2012 while you were on the gaming floor of River Rock Casino Resort you were involved in an incident of inappropriate behaviour. As a result of this incident, you have been prohibited from entering all Casinos, Community Gaming Centres and Commercial Bingo Halls in British Columbia. This prohibition is in effect for one year, starting September 19, 2012 and expiring at midnight on September 19, 2013.

Attached you will find a notification pursuant to Section 92(b) of the Gaming Control Act (the *Act*) which authorizes British Columbia Lottery Corporation to forbid any person from entering a Casino, Community Gaming Centre or Commercial Bingo Hall by providing written notice. Should you enter a Casino, Community Gaming Centre or Commercial Bingo Hall in British Columbia during the period of your prohibition you may be subject to proceedings under the Gaming Control Act.

BCLC hereby notifies you that you are not eligible to have a PlayNow.com account during the prohibition period. If you have an existing PlayNow.com account, BCCLC has the right to close it. If you gamble on a PlayNow.com after being prohibited, BCCLC will retain the bet, if you win, BCCLC will not pay the prize in accordance with the rules and regulations.

Failure to comply with this prohibition is an offence under section 97(2)(d) of the *Act* and you may be liable to a penalty or fine under section 98(3).

Also, pursuant to section 93(3) of the *Act* you are not entitled to receive any prize or winnings as a result of your participation in gaming at any gaming facility during the period of this Notice.

Yours truly,

[Signature]
Stone Lee
Investigator,
Casino Security and Surveillance

Gordon Friesen
Manager,
Casino Security and Surveillance

2940 Virtual Way
Vancouver, BC V5M 0A6

T 604.215.0649
F 604.226.8424
bclc.com



NOTICE OF PROHIBITION
British Columbia Lottery Corporation (BCLC) Barring

Name: Paul King JIN

Address: **PERSONAL INFORMATION** [REDACTED]

Reason for Barring: An incident of inappropriate behaviour on the gaming floor of River Rock Casino Resort on September 19, 2012.

You have been barred from all Casinos, Community Gaming Centres and Commercial Bingo Halls in the Province of British Columbia. -

You are prohibited from entering onto or in any way trespass upon any Casino, Community Gaming Centre or Commercial Bingo Hall for any reason whatsoever as of the date of this notice for the period noted below. Your barring shall expire on the expiry date indicated at midnight.

6 months 1 year XX 2 years 5 years

Expiry Date: September 19, 2013

Notice: Pursuant to section 93(3) of the Gaming Control Act (the *Act*) you are not entitled to receive any prize or winnings as a result of your participation in gaming at any gaming facility during the period of this Notice.

You are hereby notified by BCCLC by the authority of Section 92 (b) of the Act that you are forbidden from entering any Casino, Community Gaming Centre or Commercial Bingo Hall during the term of this barring. If you attend any Casino, Community Gaming Centre or Commercial Bingo Hall in the Province of British Columbia during the term of this barring and are identified by BCCLC or facility staff you will be requested to leave. If you refuse to leave upon request or enter a Casino, Community Gaming Centre or Commercial Bingo Hall during the period of barring or at any other time when you are prohibited from doing so, you will be removed.

Failure to comply with this prohibition is an offence under section 97(2)(d) of the *Act* and you may be liable to a penalty of fine under section 98(3).

Gordon Friesen

Manager, Casino Security and Surveillance

September 26, 2012

Date

IF YOU REQUIRE HELP WITH PROBLEM GAMBLING, YOU CAN ACCESS THE
PROBLEM GAMBLING HELP LINE ANYTIME AT 1-888-795-6111.

THIS IS EXHIBIT “G” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20120045514**

Date/Time Occurred:	9/30/2012 3:46 PM	Record Creation Details
Day of Week Occurred:	Sunday	Department: Gaming Operations
Date/Time Created:	9/30/2012 3:51 PM	Owner: cjames
Date/Time Closed:	10/6/2012 9:11 AM	Operator ID: tferguson
Closed By:	ilupu	Operator Name:
		Personnel ID:
		Card Number:
		Job Position:
		Secondary Operator:

Location of Incident

Property:	Starlight Casino (GC)
Location:	Common Areas-Starlight Casino
Sublocation:	Casino Lobby

Details of Incident:

Daily Log #:	DL20120907085			
Type:	Non-Gaming Incident			
Specific:	JDLR (Just Doesn't Look Right)			
Category:				
Incident Status:	Closed			
Closing Remarks:	IL			
Synopsis:	Female patron issued a complaint against a male patron			
Checklist:				
Narrative:	Created On	Created By	Modified On	Modified By
	9/30/2012 3:51 PM	tferguson		
	Female patron issued a complaint against a male patron stating that he was following her.			

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20120045514****Participants involved:****Personnel**

Full Name:	HILLER, Michael	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Full Name:	BOUCHER, Steve	Property:	Starlight Casino (GC)
Role:	Info From	Department:	Surveillance
Police Contacted:	Taken From Scene:		Police Contacted Result:

Subject

Full Name:	JIN, Paul King	Company:	Water Cube
Role:	Accused		
Full Name:	PERSONAL INFORMATION [REDACTED]		Company: Import/Export Fruit Company
Role:	Patron		

Supplemental Entries:

SP20120115867 Attached by sboucher on Sep 30, 2012 00:00

Description At approximately 15:30 hrs on September 30, 2012 the writer Security Supervisor (S/S) BOUCHER, Steve was called to the lobby to assist with an Asian female , known as [REDACTED] PERSONAL INFO who is reporting that an unknown Asian male is 'bothering' her.

The writer informed surveillance and approached [REDACTED] PERSONAL and asked her to provide details of the situation. [REDACTED] PERSONAL stated that the male was following her and she wanted an escort out of the casino to her car.

The writer approached the male and requested identification which was denied. The male, identified only as STAR12-45514, informed the writer that [REDACTED] PERSONAL owed him money and that [REDACTED] PERSONAL defrauded him. At this time while the writer was engaged in conversation with the unknown male, [REDACTED] PERSONAL took the opportunity to exit the casino and proceed to her vehicle then depart from Casino property. The writer was able to record the license number of the vehicle as "990 WMF".

The unknown male wanted to pursue [REDACTED] PERSONAL, the writer informed him that he would not be permitted to do so on casino property and that he should contact the police regarding his claims of being defrauded.

The male subject would not provide further details nor would he provide his name or identification upon multiple requests.

The writer informed Shift Manager Kenny MCINALLY of the situation.

The subject was informed that he would need to provide identification on his next visit to the casino.

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20120045514**

SP20120115867 Attached by sboucher on Sep 30, 2012 00:00

SP2012011586

7 - Continued-

STAR12-45514 was then escorted to the underground parking where he entered into his vehicle and departed from Casino property without further incident. Vehicle is a LEXUS color silver BCLP 561 RRH.

END OF REPORT.

Steve BOUCHER
GPEB # 60141
Starlight Casino
Security Supervisor

SP20120116114 Attached by mhiller on Oct 1, 2012 00:00

Description Report was reviewed and noted. [REDACTED] (f) was concerned that the LNU Asian male was following her and she wanted security to escort her from the casino. The LNU male was approached by Security, but the male refused to produce ID. The LNU male's explanation for his interest in [REDACTED] was that she defrauded him.

I note the following vehicles for future reference:

[REDACTED] vehicle, BCL: 990 WMF
LNU male's silver Lexus, BCL: 561 RRH

Comments:

The LNU male's claim that [REDACTED] defrauded him, may or may not be true. Another explanation might be that [REDACTED] is a regular player and she is avoiding the LNU male due to owing money to him as a result of her gambling. Whatever the reason, this incident does have an element of criminality and as such a form 86 is required. I sent an email to the surveillance manager Uros Savic regarding this requirement.

No further BCLC action is being taken.

BCLC investigator Stone Lee advised that the a/n Asian LNU male is in fact BCLC barred patron JIN, Paul King SID: 118418. This fact further emphasizes my comments above. His subject profile is to be added as a participant.

Mike HILLER
BCLC Casino Security Investigator

SP20120116149 Attached by ilupu on Oct 1, 2012 12:12

Description Form 86 sent.

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20120045514

Reporting Party:

Supervisor:

THIS IS EXHIBIT “H” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

November 7, 2012

REGISTERED LETTER

Mr. JIN, Paul Kin

PERSONAL INFORMATION



Dear Mr. JIN:

The British Columbia Lottery Corporation is responsible for the conduct, management, and operation of gaming in British Columbia, including Casinos, Community Gaming Centres and Commercial Bingo Halls.

On October 25, 2012 while you were at the Starlight Casino you were involved in an incident of inappropriate behavior. As a result of this incident, you have been prohibited from entering all Casinos, Community Gaming Centres and Commercial Bingo Halls in British Columbia. This prohibition is in effect for five years, starting November 5, 2012 and expiring at midnight on November 5, 2017.

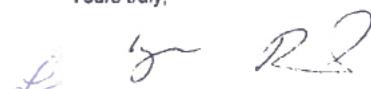
Attached you will find a notification pursuant to Section 92(b) of the Gaming Control Act (the Act) which authorizes British Columbia Lottery Corporation to forbid any person from entering a Casino, Community Gaming Centre or Commercial Bingo Hall by providing written notice. Should you enter a Casino, Community Gaming Centre or Commercial Bingo Hall in British Columbia during the period of your prohibition you may be subject to proceedings under the Gaming Control Act.

BCLC hereby notifies you that you are not eligible to have a PlayNow.com account during the prohibition period. If you have an existing PlayNow.com account, BCLC has the right to close it. If you gamble on a PlayNow.com after being prohibited, BCLC will retain the bet, if you win, BCLC will not pay the prize in accordance with the rules and regulations.

Failure to comply with this prohibition is an offence under section 97(2)(d) of the Act and you may be liable to a penalty or fine under section 98(3).

Also, pursuant to section 93(3) of the Act you are not entitled to receive any prize or winnings as a result of your participation in gaming at any gaming facility during the period of this Notice.

Yours truly,



Gordon Friesen
Manager, Casino Security & Surveillance



2940 Virtual Way
Vancouver, BC V5M 0A6
604 215 0649
604 226 6424

BCLC0012816



NOTICE OF PROHIBITION
British Columbia Lottery Corporation (BCLC) Barring

Name: Mr. JIN, Paul King

Address: **PERSONAL INFORMATION**

Reason for Barring: An incident of inappropriate behavior on casino property while at the Starlight Casino on October 25, 2012.

You have been barred from all Casinos, Community Gaming Centres and Commercial Bingo Halls in the Province of British Columbia.

You are prohibited from entering onto or in any way trespass upon any Casino, Community Gaming Centre or Commercial Bingo Hall for any reason whatsoever as of the date of this notice for the period noted below. Your barring shall expire on the expiry date indicated at midnight.

6 months 1 year 2 years 5 years X

Expiry Date: November 5, 2012

Notice: Pursuant to section 93(3) of the Gaming Control Act (the *Act*) you are not entitled to receive any prize or winnings as a result of your participation in gaming at any gaming facility during the period of this Notice.

You are hereby notified by BCCLC by the authority of Section 92 (b) of the Act that you are forbidden from entering any Casino, Community Gaming Centre or Commercial Bingo Hall during the term of this barring. If you attend any Casino, Community Gaming Centre or Commercial Bingo Hall in the Province of British Columbia during the term of this barring and are identified by BCCLC or facility staff you will be requested to leave. If you refuse to leave upon request or enter a Casino, Community Gaming Centre or Commercial Bingo Hall during the period of barring or at any other time when you are prohibited from doing so, you will be removed.

Failure to comply with this prohibition is an offence under section 97(2)(d) of the *Act* and you may be liable to a penalty or fine under section 98(3).

November 7, 2012

Date

Gordon Friesen

Manager, Casino Security and Surveillance

IF YOU REQUIRE HELP WITH PROBLEM GAMBLING, YOU CAN ACCESS THE PROBLEM GAMBLING HELP LINE ANYTIME AT 1-888-795-6111.

July 16, 2010

THIS IS EXHIBIT “I” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20150010775****Date/Time Occurred:**Redacted
- RCMP

11:25

Day of Week Occurred:**Record Creation Details****Date/Time Created:**

11:30

Date/Time Closed:**Closed By:****Department:** Surveillance**Owner:** stboucher**Operator ID:** ppetrovic**Operator Name:****Personnel ID:****Card Number:****Job Position:****Secondary Operator:****Location of Incident:****Property:** Starlight Casino (GC)**Location:** Back of House-Starlight Casino**Sublocation:** CD 12**Details of Incident:****Daily Log #:** DL20150193383**Type:** Gaming**Specific:** Unusual Financial Transaction**Category:** Substantiated**Incident Status:** Closed**Synopsis:**

Redacted - RCMP

Checklist: - Section 86 FormRedacted -
FINTRAC**Narrative:****Created On****Created By****Modified On****Modified By**Redacted -
RCMP

11:30 ppetrovic

Redacted - RCMP

Executive brief:**Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20150010775****Participants Involved:**

Personnel:	LEE, Stone	Property:
Role:	Documenter	Department:
Personnel:	MILIN, Jelena	Property:
Role:	Info From	Department:
Police Contacted:	Taken From Scene:	Police Contacted Result:
Personnel:	CHIU, Wing "Maggie"	Property:
Role:	Other	Department:
Personnel:	LANG, William "Bill"	Property:
Role:	Other	Department:
Personnel:	PETROVIC, Predrag Peca	Property:
Role:	Reporter	Department:
Personnel:	DUMITRA, Elena	Property:
Role:	Reporter	Department:
Personnel:	ALEXANDER, Jason John	Property:
Role:	Reporter	Department:
Subject:	Redacted - RCMP	Company:
Role:		Company:
Subject:		Company:
Role:		Company:
Subject:		Company:
Role:		Company:
Subject:		Redacted - RCMP
Role:		Company:
Subject:		Company:

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150010775

Supplemental Entries:

SP20150030009 Attached by stolee on [Redacted - RCMP] 11:55

Description: [Redacted - RCMP] A review of this report was done, incident noted. Writer will attend surveillance to review this incident.

Stone LEE
BCLC Investigator



Redacted
- RCMP

Reporting Party:	Supervisor:
------------------	-------------

Incident File Full Report

Incident File #IN20150010775

SP20150030009 Attached by stolee on [Redacted - RCMP] 11:55

SP2015003000
9 - Continued-

Redacted
- RCMP

Reporting Party:	Supervisor:
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Incident File Full Report

Incident File #IN20150010775

SP20150030009 Attached by stolee on

Redacted -
RCMP

11:55

SP2015003000

9 - Continued-



On this date BCLC manager GATTO was informed of this incident.

Stone LEE
BCLC Investigator

SP20150030056 Attached by edumitra on Redacted - RCMP 13:27

Description:



Reporting Party:	Supervisor:
------------------	-------------

Incident File Full Report

Incident File #IN20150010775

SP20150030056 Attached by edumitra on [Redacted - RCMP] 13:27

SP2015003005
6 - Continued-

Redacted
- RCMP

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20150010775**

SP20150030056 Attached by edumitra on

Redacted -
RCMP

13:27

SP2015003005
6 - Continued-

Redacted - RCMP

Form 86 sent.

End of report.

SP20150030123 Attached by ppetrovic on Redacted - RCMP 15:59

Description: UPDATE @ 17:37

Redacted - RCMP

SP20150031525 Attached by jjalexander on Redacted - RCMP 07:23

Description: File sent to GPEB on Redacted - RCMP .

Jason ALEXANDER
Surveillance Supervisor
GPEB #42063.

End Of Report.

SP20150031904 Attached by jjalexander on Redacted - RCMP 15:02

Description: ***UPDATE***

Redacted - RCMP

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150010775

SP20150031904 Attached by jjalexander on [Redacted - RCMP] 15:02

SP2015003190
4 - Continued-

Redacted
- RCMP

Jason ALEXANDER
Surveillance Supervisor
GPEB #42063.

End Of Report.

SP20150033581 Attached by usavic on [Redacted - RCMP] 08:17

Description: At approximately 0743 hrs on [Redacted - RCMP] one DVD-R [Redacted - RCMP], containing the footage of this incident has been released to GPEB Investigator Dave WILLIS.

SP20150037403 Attached by edumitra on [Redacted - RCMP] 10:40

Description: On [Redacted - RCMP] footage [Redacted - RCMP] was released to Stone LEE - BCLC.

68196

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20150010775

List of Attached Forms:

Prefix	Form Name
--------	-----------

Redacted - FINTRAC

Reporting Party:

Supervisor:

THIS IS EXHIBIT “3” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

2015

11)

(INC,

Redacted -
Patron
Interview
Identifying
Information

CELL

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Patron

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2015

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REVIEW

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9 2015

S OF

RIS GADERS

CPIZ

2016

Date APR 10 2015

INVESTIGATOR DAVE WILLIS AND DISCUSS RECENT INCIDENTS ATTENDED SURVEILLANCE, MET WITH SUPERVISOR ELENA DUNTRA AND REVIEWED INC # 18470, # 18567, # 18446, # 17271, AND # 18223, OFF SITE 1545 HRS.

0800

Redacted -
Patron
Interview
Identifying
Information

INTERV

X

ARRIVED AT STARLIGHT, UPDATED PERFORMANCE NOTED INC # 18771 AND # 18716. CONTACTED BCLC BANDING SUBJECT [REDACTED] PERSONAL INFORMATION REGARDING CONSUMER CASE # 01974661, EXPLAINED THE APPEAL PROCESS AND REMINDED MR. [REDACTED] PERSONAL INFO THE EXPIRE DATE REQUEST INVESTIGATOR BRIAN STEPHENS TO CLOSE THE CONSUMER CASE DUE TO PASSWAD) Lock out. [REDACTED]

Redacted - FINTRAC

CONSULTED WITH INVESTIGATOR TOM CAULEY REGARDING BCLC BANDING, FOR INC # 18470, AGREES THAT SITE BANDING IS SUFFICIENT.

Redacted - Patron Interview Identifying Information

Redacted - Patron Interview
Identifying Information

AND CONDUCTED INTERVIEW ALONG WITH BCLC INVESTIGATOR CAULEY.

Redacted -
Patron
Interview

WAS INFORMED)

THAT WE WOULD LIKE HIM TO HELP US TO UNDERSTAND WHAT WE IS THE REASON HE HAD THE MEETING WITH

Redacted - RCMP

ON

Redacted - Patron Interview Identifying Information

BEGINED BY

(STATED, (STATED) THAT HE JUST RETURN FROM CHINA AND HE HAD

VISITED A FEW VIP PATRON INCLUDING.

Redacted - Patron Interview
Identifying Information

Redacted - Patron Interview
Identifying Information
STATED THAT [REDACTED] IS VERY WEALTHY AND HAVE A LOT OF BUSINESS IN CHINA.

Redacted - Patron Interview Identifying Information

AS WELL AS OWNING A [REDACTED]

Redacted -
Patron
Interview

Redacted - Patron Interview Identifying Information

WAS ASKED IF HE RECALL A MEETING THAT TOOK PLACE ON [REDACTED] WITH

PATRON IDENTIFIED AS [REDACTED]

Redacted - Patron Interview Identifying Information

AND

APRIL 13 2015

Redacted - RCMP ALONG WITH Redacted - Patron Interview Identifying Information STATED

HE HEARD HEARD ABOUT Redacted - RCMP "HE IS A LOAN SHARK"

"BUT I DON'T KNOW HIM". "I ONLY KNOW BECAUSE
VILLA INVESTIGATOR TOLD ME". Redacted - Patron Interview STATED

WHAT HAPPENED WITH Redacted - RCMP ? AND SAID WAS HE
THERE AT THE MEETING? Redacted - Patron Interview WAS ASKED BY

CAVERLY THAT "YOU DON'T KNOW PEOPLE THAT
YOU'RE HAVING A MEETING WITH". Redacted - Patron Interview RESPONDED

BY SAYING Redacted - Patron Interview IDENTIFYING INFORMATION HAS SET UP THE MEETING,
AND HE ONLY KNOWS A PLAYER Redacted - Patron Interview , AND

ONE OF THE LNU MALE WAS FROM CHINA AND
OWNS A Redacted - Patron Interview IDENTIFYING INFORMATION IN CHINA.

THEY WAS DISCUSSING POSSIBLE INVESTMENT
WITH Redacted - Patron Interview IDENTIFYING INFORMATION

Redacted - Patron Interview IDENTIFYING INFORMATION ALSO STATED THAT HE HAD
APPROACH Redacted - Patron Interview BEFORE WITH THE OPPORTUNITY

STATE) Redacted - Patron Interview IS IN CHINA STILL AT
THIS TIME Redacted - Patron Interview REQUEST
MEETING WITH Redacted - Patron Interview WAS TOLD TO SET UP A

FOR INTERVIEW WITH BCLC
AND STATED HE WOULD OFF SITE 1620 HRS.
ARRIVED AT BRCB BUT EVERYONE HAS LEFT.
OFF SITE 1630 HRS.

APRIL 13 2015

0815 ARRIVED AT STARLIGHT CASINO, NOTED INC #19402,
#19144, AND #18972. MET WITH GPER INVESTIGATOR
DAVE WILLIS, ATTEMPTED TO DISCUSS RECENT INCIDENTS.
ATTENDED SURVEILLANCE, MET WITH SUPERVISOR
JASON ALEXANDER AND REVIEWED INC #19402.

Page 1

THIS IS EXHIBIT “K” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

To: Glen Atchison [REDACTED] PERSONAL INFORMATION

PERSONAL INFORMATION

[REDACTED] PERSONAL INFORMATION [REDACTED]

Craig Longley [REDACTED] PERSONAL INFORMATION [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

Kroeker [REDACTED] PERSONAL INFORMATION [REDACTED]

Ennis [REDACTED] PERSONAL INFORMATION [REDACTED]

PERSONAL INFORMATION

[REDACTED] [REDACTED] [REDACTED]

Great Canadian Casino-Security Director [REDACTED] PERSONAL INFORMATION

PERSONAL INFORMATION

[REDACTED] PERSONAL INFORMATION [REDACTED]

Devin McCormack [REDACTED] PERSONAL INFORMATION

[REDACTED] [REDACTED] [REDACTED]

Cc: Bruno Gatto [REDACTED] PERSONAL INFORMATION Kevin Sweeney [REDACTED]

Desmarais [REDACTED] PERSONAL INFORMATION Daryl Tottenham [REDACTED]

From: Ross Alderson [REDACTED]

Sent: V3: Operational File - [REDACTED]

Subject: Sanctions on high limit players

V3: Operational [REDACTED]

Fil C t

Good morning,

This morning certain conditions were imposed on a list of 10 Casino Patrons which I have attached to this email. Their iTRak profiles will be shortly updated.

All players on the list are no longer permitted to buy-in at any BC Casino with any "un-sourced" cash or gaming chips until further notice.

BCLC has attempted to contact all 10 players to arrange an interview with each patron to inform them of the conditions and discuss certain recent activity which has resulted in these conditions. Unfortunately at this time due to sensitivity I am not at liberty to discuss that activity further.

Below are the following conditions to be imposed effective IMMEDIATELY:

1/ Un-sourced Cash and Chips

- If any of the players on the list decides to buy-in using cash (any amount), this buy-in must be accompanied by a withdrawal slip from an accredited financial institution showing the same date as the attempted buy-in.
 - If any of the players on the list decides to buy-in with gaming chips, the site must be able to show that the chips were the result of a previous verified win, otherwise they will not be accepted at this time until BCLC has conducted a player interview.
 - No player on this list can accept any cash or chips (either sourced or un-sourced) from any other persons at any time. Eg no "chip passing" of any kind

Please note the above applies to all transactions, regardless of amount

2/ Bank Drafts

- If any of the players on the list make a deposit into their PGF Account using a bank draft, the following restrictions apply:
 - Bank Draft must be from an accredited financial institution
 - The player must be able to show that the Bank Draft is derived from their own bank account, and must be made payable to the Casino accepting the deposit

Any deviation from the above conditions, may result in immediate additional measures, including sanctions such as possible suspension or outright prohibition of the players gaming privileges.

As we value our business partnership with all our players, it is critical that all Service Partners assist in

ensuring these conditions are followed without exception. BCLC will continue to reach out to all players today in the hope of alleviating the need for any future sanctions.

As always we appreciate the assistance of our business partners.

If there are any comments or questions please feel free to contact me at your earliest convenience and I will attempt to answer as much as I am able.

Thank you for your cooperation

Regards

Ross Alderson CAMS

Director, AML & Operational Analysis
Corporate Security and Compliance Division, BCLC
2940 Virtual Way, Vancouver, BC V5M 0A6

PERSONAL INFORMATION

Subject Id	First Name	Middle Name	Last Name
174856	PERSONAL INFORMATION		PERSONAL INFORMATION
14033			
58336			
67404	Jianwei		LIANG
71603	Guo Tai		SHI
85666	PERSONAL INFORMATION		
43366			
90767			
175028			
141503			

THIS IS EXHIBIT “L” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

From: Daryl Tottenham
Sent: April-16-18 2:53 PM
To: Rob Kroeker [REDACTED] PERSONAL INFORMATION
Cc: John Karlovcev [REDACTED]
Subject: FW: Request for assistance

The original buy-in by the patron was 170K , mostly in \$20's and some \$50's. I sent them to Suhuida to confirm it existed and if it was legit. It is registered with Fintrac but when the patron went back the following week for another wire transfer , they advised him he was blacklisted from their business for showing the receipt to BCLC. File 2016-36087 refers.

FYI
D

From: Steve Beeksma
Sent: Friday, June 24, 2016 2:35 PM
To: Daryl Tottenham [REDACTED] PERSONAL INFORMATION Stone Lee [REDACTED] PERSONAL INFORMATION Jim Husler [REDACTED]
Cc: Ross Alderson [REDACTED] Tom Caverly [REDACTED] PERSONAL INFORMATION
Subject: RE: Request for assistance

Hi all,

Stone and I attended Suhuida Currency Exchange this afternoon. BCLC only file 2016-36087 has been opened and the specifics documented there.

In short:

- they acknowledged the receipt is from their location (confirmed on their computer system).
- they acknowledged they give out \$20's. Denominations they give out is dependent of what cash they have on hand.
- better rates are **not** given to customers willing to take small bills.
- the young A/M behind the transaction window seemed completely un-phased by our presence/questions and never asked who we are or why we were asking these questions.
- no known vehicles of interest were observed in the parking lot which is shared by a number of neighbouring businesses.

See BCLC file 16-36087 for complete details (a scan of a business card acquired from the 3 road location is in the media tab).

FYI,

Steve Beeksma
Casino Investigations
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6
[REDACTED] PERSONAL INFORMATION

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Daryl Tottenham
Sent: June-24-16 6:22 AM
To: Steve Beeksma; Stone Lee; Jim Husler
Subject: Fw: Request for assistance

Morning guys,

Could you guys print off a copy of the attached receipt and attend at the business address of this money exchange and determine if they in fact issued it and find out why they would be paying customers in small bills? Also get any names of staff that you can, plates. Etc that we can use to conduct further dives and create a BCLC give to document everything.

I am on cell do shout me if you have any questions.

Thx Daryl

Sent from my BlackBerry 10 smartphone on the TELUS network.

THIS IS EXHIBIT “M” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20170052024**

		Record Creation Details	
Date/Time Occurred:	9/13/2017 2:08 PM	Department:	Surveillance
Day of Week Occurred:	Wednesday	Owner:	Iwan
Date/Time Created:	9/13/2017 2:19 PM	Operator ID:	Iwan
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident:

Property:	River Rock (GCC)
Location:	Back of House-River Rock (GCC)
Sublocation:	VIP Cash Cage

Details of Incident:

Daily Log #:	DL20170904258
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	[REDACTED]

Risk Classification:

Incident Status:	Closed
Custom 3:	
Custom 4:	
Synopsis:	

***SID 227278 Cash buy In \$200 K in 100's going to MDB 27 - INC opened.

WS 15-02

Checklist:	- Section 86 Form
[REDACTED]	

Narrative:	Created On	Created By	Modified On	Modified By
	9/13/2017 2:19 PM	Iwan		

SID 227278 Cash buy In \$200 K in 100's going to MDB 27
WS 15-02

Executive Brief:**Reporting Party:****Supervisor:**

Incident File Full Report**Incident File #IN20170052024****Participants Involved:****Personnel**

Full Name: LEE, Stone Property: Vancouver (BCLC)
 Role: Documenter Department: BCLC

Date Of Birth:

Subject

Full Name: [REDACTED] Company: Zhong Hua Financial
 Role: Other

Date Of Birth: **PERSONAL INFORMATION**

Address:

Contact Info:

Full Name: [REDACTED] Company: Global Dingye Capital Ltd

Role: Patron

Date Of Birth: **PERSONAL INFORMATION**Address: **PERSONAL INFORMATION**Contact Info: **PERSONAL INFORMATION****Supplemental Entries:**

SP20170144854 Attached by Iwan on Sep 13, 2017 14:21

Description New SID 227278 [REDACTED] bought in 200K in all \$100's and all his bricks were held by elastic bands. Due to his questionable origin of his funds, an UFT is opened.

Review showed [REDACTED] arrive in a gray Mercedes Benz SUV bearing L/P EC918X as sole occupant at 1353 hrs. He emerged from his vehicle carrying a gray plastic bag. He entered Salon and was led to CD 19 private window by GAO Lisa, Director of VIP Guest Relations. [REDACTED] took a brown and light brown big envelopes out from the plastic bag. He then removed 2 bricks of \$100's from each envelope and presented them to CD 19. All bricks were held by elastic bands and bills were comprised of 2000 x \$100's totaling 200K. At 1421 hrs, [REDACTED] received 40 x 5K in chips on MDB 27; placed all his chips in a River Rock purple pouch and put the pouch in his black shoulder bag. He left the table with no play and returned to his vehicle at 1424 hrs. Due to the location where he was parked, it could not be seen what he was doing in his vehicle. At 1430 hrs, vehicle was driven off site.

Form 86 sent.

Footage M/SEPT/SFT/17-52024

L WAN
25549

SP20170145139 Attached by stolee on Sep 14, 2017 06:54

Description Sep/14/2017 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Reporting Party:**Supervisor:**

Incident File Full Report**Incident File #IN20170052024**

SP20170145139 Attached by stolee on Sep 14, 2017 06:54

SP2017014513
9 - Continued-

Stone LEE
BCLC Investigator

On Sep/14/2017 writer reviewed this incident, surveillance footage supports what has been documented in this report. Footage shows on the date of Sep/13/2017 at 1354:15 hrs subject identified as [REDACTED] arrived at the south parkade in a silver Mercedes SUV BCLP#EC918X. [REDACTED] emerged from the vehicle alone wearing a dark colored shoulder bag and carrying a plastic bag in hand while heading towards the skywalk.

At 1356:48 hrs VIP manager identified as Lisa GAO was seen standing by the Salon guest services desk.

At 1357:21 hrs GAO was seen answering her cellphone (it appears that [REDACTED] was on his cellphone during this same time) and headed towards the Salon door. GAO proceeded to open the Salon door and met [REDACTED] at the entrance then proceed to escort [REDACTED] towards the Salon cage.

At 1358:01 hrs GAO and [REDACTED] entered the Salon private cage. [REDACTED] was seen removing 2 (different yellow colored) document envelopes from the plastic bag then removed 4 large bundles of bills from the envelopes and placed the bundles on the cage counter. Each bundle were wrapped with elastic bands. [REDACTED] produced 2000 in \$100 bills for \$200,000 buy-in.

At 1401:44 hrs [REDACTED] exited the private cage and took seat on MDB27 along with GAO.

It is noted that GAO left the table for a brief moment and returned to the table with a purple colored River Rock bag in hand, GAO was seen passing the bag to [REDACTED] (This action appears to indicate that GAO knew/or expecting that [REDACTED] was going to take the gaming chips off site)

At 1403:55 hrs [REDACTED] was seen using his cell phone while waiting for his gaming chips.

At 1418:09 hrs GAO was seen introducing RRRC GM Michael KIM and AGM Respal KHAIRA to [REDACTED]

[REDACTED] At 1421:19 hrs [REDACTED] was seen making a call on his cellphone while waiting for his gaming chips. At 1421:57 hrs [REDACTED] received 40 in \$5,000 gaming chips on MDB27. [REDACTED] was seen placing all 40 x\$5K chips into the purple River Rock bag then placed the purple bag into his shoulder bag and proceed to leave the Salon without placing a single wager.

At 1424:28 hrs [REDACTED] arrived at his vehicle. [REDACTED] remained in his vehicle till 14:30 hrs.

A review of [REDACTED] subject profile was done, it appears that [REDACTED] is new to the BC casinos and it is also noted that [REDACTED] had no prior incidents nor any LCT in the past.

[REDACTED] Due to the fact that [REDACTED] did not place a single wager after the large buy-in on this date, particularly large amount of the un-sourced cash used for this buy-in and no play are indicators of suspicious activity/transactions in BC Casinos.

[REDACTED] A review of [REDACTED] subject profile was done, [REDACTED] has no prior incident [REDACTED] with in the BC casinos, according to casino records he has provided his occupation as "Financial Advisor".

Based on the above circumstances this incident [REDACTED] RCMP.

On 2017/Sep/14 This incident has been reported to CISBC-YT RCMP for informational purposes only. [REDACTED] BCLC Inc#17-52024 refers.

Stone LEE
BCLC Investigator

SP20170145880 Attached by Iwan on Sep 15, 2017 15:14

Description SAMSON Heather, Investigator of Compliance Division GPEB, sent Surveillance an email and

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20170052024**

SP20170145880 Attached by Iwan on Sep 15, 2017 15:14

SP2017014588
0 - Continued-

requested for DVD regarding this incident.

Evidence cabinet was opened for DVD. DVD #1603 was burned and sealed in evidence bag S/N M0166550 pending pick up.

Email sent to SAMSON for DVD pick up.

L WAN
25549

SP20170147476 Attached by djankovic on Sep 18, 2017 10:19

Description SAMSON picked up an evidence bag # M0166550 containing DVD # 1603.

Dejan JANKOVIC
GPEB # 24617

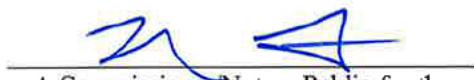
SP20170178929 Attached by sbeeksma on Nov 10, 2017 11:34

Description After further investigation by GPEB and BCLC it was determined that [REDACTED] PERSONAL INFORMATION SID 89160)

S.Beeksma
BCLC AML Investigations

Reporting Party:**Supervisor:**

THIS IS EXHIBIT “N” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20180029146**

Data/Time Occurred:	5/10/2018 4:47 PM	Record Creation Details	
Day of Week Occurred:	Thursday	Department:	Gaming Operations
Date/Time Created:	5/10/2018 5:09 PM	Owner:	alaw
Date/Time Closed:	5/14/2018 9:33 AM	Operator ID:	Iwan
Closed By:	stolee	Operator Name:	
		Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident

Property: River Rock (GCC)

Location:

Sublocation:

Details of Incident:

Daily Log #: DL20180440515

Type: Gaming

Specific: Unusual Financial Transaction

Category: Unsubstantiated - No Receipt

Incident Status: Closed

Synopsis: PERSONAL INFORMATION \$10K cash buy in at cage CD 19 RRWS13 M-02

Checklist: - Section 86 Form

Narrative:	Created On	Created By	Modified On	Modified By
	5/10/2018 5:09 PM	Iwan		
	<small>PERSONAL INFORMATION</small>	\$10K cash buy in at cage RRWS13 M-02		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180029146****Participants Involved:****Personnel**

Full Name:	TAN, Sandra Claudia	Property:	River Rock (GCC)
Role:	Documenter	Department:	Tables
Full Name:	CHEUNG, Ching Yee Pauliana	Property:	River Rock (GCC)
Role:	Documenter	Department:	Cage

Subject

Full Name:	<small>PERSONAL INFORMATION</small>	Company:	Yao's Garment Factory
Role:	Patron		

Supplemental Entries:

SP20180080922 Attached by sandratan on May 10, 2018 17:19

Description On the gaming date May 10, 2018 at approximately 17:00, I was informed by C/S Pauliana that [REDACTED] attempted to buy in 10K cash at CD 19. I approached [REDACTED] and requested for SOF but she stated she does not have a receipt for 10K. SOF was explained to her and she decided to use debit card buy in. Cash was returned to her.

Gaming Manager
TAN, Sandra GPEB#54743

SP20180080957 Attached by lwan on May 10, 2018 18:33

Description New SID 243315 [REDACTED] attempted to buy in 10K but was declined due to no receipt as per G/M TAN.

[REDACTED] Review showed [REDACTED] approach CD 19 and take a brick of \$20's and \$50's out from her purse at 1628 hrs. She placed her bills on the counter of CD 19; counting out few \$50's and putting them back in her purse. The brick was held by elastic bands. Bills were comprised of 260 x \$20's and 96 x \$50's totaling 10K. Her buy-in was declined due to no receipt was produced.

Form 86 sent.

Footage M/MAY/SOF refusal/18-29146

L WAN
25549

SP20180081052 Attached by pccheung on May 10, 2018 23:19

Description Approx. 16:40hrs on May 10, 2018 patron Ms. [REDACTED] SID 243315 was attempting to do table buy in with her \$50 and \$20 dollars bills. She told cashier Ruby that the total buy in amount to \$9,800. In fact, it was in total of \$10,000 after actual count and patron was unable to provide receipt for those money. Transaction was denied, both Surveillance and Floor Manager Sandra TAN 54743 are informed.

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180029146**

SP20180081052 Attached by pcheung on May 10, 2018 23:19

SP2018008105

2 - Continued-

Pauliana CHEUNG
Cage Supervisor
23873

SP20180081176 Attached by stolee on May 11, 2018 06:38

Description May/11/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

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

PERSONAL INFORMATION
In this case the patron identified as [REDACTED] (SID#243315) was unable to produce a receipt to source a \$10,000 buy-in that put her over \$10,000 for the gaming session as such the transaction was refused.

PERSON
Although [REDACTED] was attempting to buy-in with no receipt it does not make the cash she attempted to use or these circumstances suspicious.

PERSONAL
A review of [REDACTED] subject profile was done [REDACTED] appears to be new to the BC casinos as she have no prior history nor LCTR on file.

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 [REDACTED] or the funds she attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

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

Stone LEE
BCLC Investigator

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180029146

Reporting Party:

Supervisor:

THIS IS EXHIBIT “O” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20180030109**

		Record Creation Details	
Data/Time Occurred:	5/14/2018 11:50 PM	Department:	Gaming Operations
Day of Week Occurred:	Monday	Owner:	akao
Data/Time Created:	5/14/2018 11:53 PM	Operator ID:	donbraun
Data/Time Closed:	5/16/2018 10:08 AM	Operator Name:	
Closed By:	stolee	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident

Property:	Villa Casino (GC)
Location:	Casino Floor-Villa Casino (GC)
Sublocation:	MEZB 09

Details of Incident:

Daily Log #:	DL20180455144
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Unsubstantiated - No Receipt
Incident Status:	Closed
Synopsis:	Refused buy in of \$10,500 for [REDACTED] PERSONAL INFORMATION SID#243087
Checklist:	- Section 86 Form

Narrative:	Created On	Created By	Modified On	Modified By
	5/14/2018 11:53 PM	donbraun		
		PERSONAL INFORMATION	SID#243087	
		[REDACTED]		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180030109****Participants Involved:****Personnel**

Full Name:	MAK, Wesley "Wes"	Property:	Villa Casino (GC)
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Role:	Info From	Department:	Gaming
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Police Contacted:	Taken From Scene:	Police Contacted Result:
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Full Name:	MARK, Roland	Property:	Villa Casino (GC)
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Role:	Reporter	Department:	Surveillance
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Subject

Full Name:	PERSONAL INFORMATION	Company:
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Role:	Patron
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Supplemental Entries:

SP20180083392 Attached by wesmak on May 14, 2018 23:57

Description I Wes MAK on duty Shift Manager was informed Patron [REDACTED] attempted to buy in [REDACTED] a large sum on cash at MEZB9. After staff counted the money, it came to \$10,500. [REDACTED] [REDACTED] was unable to provide receipt for this buy in. He informed new SOF condition and buy in was denied. [REDACTED] was advised of other option of buy in this evening which includes using Quick Cash or GV debit transaction.

END of Report.

SP20180083421 Attached by donbraun on May 15, 2018 00:42

Description May 14, 2018

On the above mentioned date Surveillance was live monitoring a buy in at MEZB 9 totaling \$10,500 when the D/S Panah SADIGH INANLOU contacted Surveillance to advise that he would be returning \$1500 of the cash, which was already counted on the table, so that patron [REDACTED] [REDACTED] could buy in for under \$10,00 Surveillance advised SADIGH INANLOU to stop and contact S/M Wes MAK for advice who refused the buy in. Surveillance reviewed the applicable footage and the following was observed:

22:41:30 [REDACTED] arrives alone in a Grey Nissan SUV BCLP#FW551S and parks on P3 of the south park ade

22:55:15 [REDACTED] attempts to buy in at MEZB 9

23:16:18 The cash is returned to [REDACTED]

[REDACTED] leaves in the same Nissan

Footage saved at Vigil-Avigilon/MAY18/GPEB/UFT/IN30109

End of report

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180030109**

SP20180083421 Attached by donbraun on May 15, 2018 00:42

SP2018008342

1 - Continued-

Don BRAUN
66095

SP20180083512 Attached by stolee on May 15, 2018 06:46

Description May/15/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

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

In this case the patron identified as [REDACTED] (SID#243087) was unable to produce a receipt to source a \$10,500 buy-in that put him over \$10,000 for the gaming session as such the transaction was refused.

A review of [REDACTED] subject profile was done, it is noted that [REDACTED] has no prior UFT incident on file. It is also noted the [REDACTED] had received a cash disbursement of \$10,000 from Grand Villa Casino on May/05/2018 which appears to be his last visit to any BC Casinos.

[REDACTED]
Although [REDACTED] was attempting to buy-in with no receipt is does not make the cash (\$10,500) he attempted to use or these circumstances suspicious.

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 [REDACTED] or the funds he attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

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

Stone LEE
BCLC Investigator

SP20180083585 Attached by rmark on May 15, 2018 09:41

Description On 2018-MAY-15, Surveillance released incident reports and subject profiles for IN30109 to GPEB John McDougall as per Demand For Information form

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180030109**

SP20180083585 Attached by rmark on May 15, 2018 09:41

SP2018008358

5 - Continued-

99114 (see Media folder).

END OF REPORT

Roland MARK 26531

SP20180098062 Attached by mshyshkin on Jun 7, 2018 22:54

Description On the above mentioned date surveillance released the reports and subject profiles related to this incident via email to GPEB investigator John MCDOUGALL (see media).

File number: 99288

END REPORT

Max SHYSHKIN

77050

SP20180100968 Attached by aniculescu on Jun 12, 2018 13:12

Description Video footage for this incident has been released to GPEB.

Surveillance Supervisor

Alex NICULESCU

GPEB#50762

END OF REPORT**Reporting Party:****Supervisor:**

THIS IS EXHIBIT “P” TO THE
AFFIDAVIT OF STONE LEE
SWORN BEFORE ME AT VANCOUVER, BC
THIS 23rd DAY OF OCTOBER, 2020.



A Commissioner/Notary Public for the
Province of British Columbia.

Incident File Full Report**Incident File #IN20180033893**

		Record Creation Details	
Data/Time Occurred:	5/31/2018 4:23 PM	Department:	Gaming Operations
Day of Week Occurred:	Thursday	Owner:	lbell
Date/Time Created:	5/31/2018 4:24 PM	Operator ID:	jostonal
Date/Time Closed:	6/1/2018 11:50 AM	Operator Name:	
Closed By:	stolee	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

Location of Incident

Property:	Villa Casino (GC)
Location:	Casino Floor-Villa Casino (GC)
Sublocation:	MDB 06

Details of Incident:

Daily Log #:	DL20180509060
Type:	Gaming
Specific:	Unusual Financial Transaction
Category:	Unsubstantiated - No Receipt
Incident Status:	Closed
Synopsis:	(PERSONAL INFORMATION) (SID 165553) was denied \$10,000 buy in and bought in for \$9500 after
Checklist:	- Section 86 Form

Narrative:	Created On	Created By	Modified On	Modified By
	5/31/2018 4:24 PM	jostonal		
	(PERSONAL INFORMATION)	(SID 165553) was denied \$10,000 buy in and bought in for \$9500 after		

Executive Brief:

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180033893****Participants Involved:****Personnel**

Full Name:	LEW, Gordon "Gordo"	Property:	Villa Casino (GC)
Role:	Info From	Department:	Cage

Police Contacted:	Taken From Scene:	Police Contacted Result:
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Full Name:	MARK, Roland	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance

Full Name:	OSTONAL, Jonathan	Property:	Villa Casino (GC)
Role:	Reporter	Department:	Surveillance

Subject

Full Name:	PERSONAL INFORMATION		Company:
Role:	Patron		

Supplemental Entries:

SP20180093471 Attached by jostonal on May 31, 2018 17:20

Description On the above mentioned date at approximately 15:50 hrs Surveillance was informed that patron
 PERSONAL INFORMATION [REDACTED] (SID 165553) attempted to buy in for \$10000 and was denied; she then subsequently bought in for \$9500. A review was initiated and the following was observed:

12:33:01 - [REDACTED] PERSON arrives on site and parks.

15:36:09 - [REDACTED] tries to buy in for \$10000; the bills are counted out and the chips are prepared before the transaction is cancelled and the bills are handed back.

15:42:18 - [REDACTED] PERSON is observed counting out \$500 and removing it from the stack before handing the cash back for a \$9500 buy in that is accepted and processed - she then receives her chips and begins play.

As of 19:45 [REDACTED] PERSON is still gaming on MDB21.

Footage has been saved on Exports/2018/05. May 18/GPEB/Unusual financial transaction/IN33893 and video archive/2018/05. MAY 18/GPEB/Unusual financial transaction/IN33893.

Jonathan OSTONAL

Surveillance Officer

76984

END OF REPORT.

SP20180093745 Attached by stolee on Jun 1, 2018 06:28

Description Jun/01/2018 A review of this report was done, incident noted. Writer will make arrangement with site to review this incident.

Reporting Party:

Supervisor:

Incident File Full Report**Incident File #IN20180033893**

SP20180093745 Attached by stolee on Jun 1, 2018 06:28

SP2018009374

5 - Continued-

Stone LEE
BCLC Investigator

RE: Refused SOF Request. writer reviewed this incident, surveillance footage supports what has been documented in this report.

This incident is a compliance issue in relation to new source of funds directives implemented by BCLC's AML unit on 2018-JAN-10.

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

PERSONAL INFORMATION
In this case the patron identified as [REDACTED] (SID#165553) was unable to produce a receipt to source a \$10,000 buy-in that put her over \$10,000 for the gaming session as such the transaction was refused. It is noted that [REDACTED] decided to take back \$500 and bought in for \$9,500.

PERSON
Although [REDACTED] was attempting to buy-in with no receipt it does not make the cash (\$10,000) she attempted to use or these circumstances suspicious. It is noted that [REDACTED] did receive a total cash disbursement of \$40,000 from Parq Casino on May/29/2018 which appears to be with-in 48 hrs from her last visit to any BC Casinos.

PERSONAL [REDACTED] **PERSON**
A review of [REDACTED] subject profile was done [REDACTED] has been generating LCTR in BC casinos since Dec/2009 with buy-ins ranging from \$2,000- \$44,000 per gaming session.

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 [REDACTED] or the funds she attempted to use this date is linked to criminal activity the investigator will not be submitting an STR to FINTRAC.

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

Stone LEE
BCLC Investigator

SP20180096372 Attached by rmark on Jun 5, 2018 09:02

Description On 2018-JUN-05, Surveillance released incident reports and subject profiles for IN33893 to GPEB John McDougall as per Demand For Information form (see Media folder).

END OF REPORT
Roland MARK 26531

Reporting Party:

Supervisor:

Incident File Full Report

Incident File #IN20180033893

Reporting Party:

Supervisor: