

To: Daryl Tottenham[REDACTED]
Cc: John Karlovce[REDACTED]; Bal Bamra[REDACTED]; Rob Kroeker[REDACTED]
From: Daryl Tottenham
Sent: Wed 2019-02-06 9:10:34 PM
Subject: FW: AML

From: Ross Alderson <REDACTED>
Sent: Tuesday, January 24, 2017 1:20 PM
To: Brad Rudnicki <REDACTED>; Cathy Cuglietta <REDACTED>; Bal Bamra <REDACTED>; Daryl Tottenham <REDACTED>; Kris Gade <REDACTED>
Subject: FW: AML

Let's keep this email on file. I think it's great to list (and recognize) exactly what we have done in AML in the last year and a half.

The list is comprehensive

Ross Alderson CAMS.

Director, AML & Investigations
Corporate Security and Compliance Division, BCLC
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•Yes, and...•

[REDACTED] 1

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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: Ross Alderson
Sent: Tuesday, January 24, 2017 1:17 PM
To: Rob Kroeker <REDACTED>
Subject: RE: AML

Hi Rob

Here is the list of AML initiatives since Jan 1, 2016. Please advise if you require further information or would like it in another format.

New

- Restructured Investigative and AML departments adding more dedicated resources to AML Intelligence and AML Investigations groups. (including a new AML manager role)
- Funded JIGIT, and established working relationships.
- Provided full day of Industry related training to JIGIT.

- Enhanced 2014 MOU with RCMP to allow proactive sharing of AML related intelligence with JIGIT.
- FinTRAC examination completed.
- Slot machine risk analysis conducted. (internal)
- Delimited amount of Convenience Cheque.
- Enhanced bank draft and non-cash transaction monitoring
- Enabled international wires.
- Additional analytics and reporting capabilities utilizing iTrak and SAS Business Intelligence tool.
- Source of Funds (SOF) interview initiative. List of individuals. (currently 46 individuals)
- Source or Wealth (SOW) initiative. 93 patrons identified as either Housewife or Student. To date 63 have been interviewed to confirm SOW.
- Refused Buy in initiative. (Where there is clear evidence of a suspicious cash delivery)
- Met with OLG and AGLC to discuss AML methodology.
- US Casino Cheque acceptance. (in progress)

Continued

- Enhanced Due diligence
- 1. High Risk Player (HRP) list. Players with conditions. (no unsourced cash and chips) List of individuals has increased since Jan 1, 2016 from 49 to 113.*
- 2. PTEP list has increased since Jan 1, 2016 from 97 individuals to 241. All currently banned as per GCA.
- 3. ACAMS training for new hires

*as a result of SOF and SOW initiatives some players have also been added to the HRP list.

Ross Alderson CAMS.

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•Yes, and...•

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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: Rob Kroeker
Sent: Tuesday, January 24, 2017 11:01 AM
To: Ross Alderson <[\[REDACTED\]](#)>
Subject: FW: AML
Importance: High

Hi Ross

Please see Jim's note below. Can you and your team give me a simple list of changes we made to the AML program through last year

Enabled international wires
Added iTRAC analytics
Funded JIGIT
Created new additional AML Mgmt role
????

Jim would like to get this notes out soon so if you could get back to me today I would really appreciate that.

Thanks,

R

From: Jim D. Lightbody
Sent: January-24-17 10:28 AM
To: Rob Kroeker <[PERSONAL INFO](#)>
Cc: Susan Dolinski <[PERSONAL INFO](#)>
Subject: AML

Rob;

In my discussion today with John, he reiterated Cheryl's request for info around STR trends, but in addition he would like a report/list of all the AML initiatives we've accomplished in the past year+.

Also, he's going to talk to Cheryl about the JIGIT thing we discussed.

Jim

Jim Lightbody
President & CEO

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