

Project ATHENA Stakeholders Meeting

DATE	October 24, 2018
START	10:01 hours
END	12:13 hours

Topic: Ben ROBINSON Presentation Roundtable Discussion: (Reference Presentation) How can we measure the success of Project ATHENA? <ul style="list-style-type: none">- Problems occurring, if the casinos stop receiving bulk cash then the banks will start to receive bulk cash. How do we combat the next thing? TD BANK <ul style="list-style-type: none">- Presented Project ATHENA to National TD HQ- Privacy Act Issues (cannot breach)- Source of funds for drafts are problematic, large transactions due diligence is performed- Cannot receive police direction, information sharing is difficult without a production order which is timely – can only confirm the account is active BMO <ul style="list-style-type: none">- Extent of liability/ privacy- Can confirm the bank draft, however, the bank may or may not have the account- Reiterates not being able to receive police direction- FINTRAC would be able to take on a stronger role as the regulators FINTRAC <ul style="list-style-type: none">- Looking at 'indicators of money laundering' training- Operational Alerts or more formal training on money laundering instead of presenting the banks with specific targets would help with compliance- Law Enforcement to supply a rationale as to why they suspect a crime has been committed- Disclosure issues when files get to court- Banks are reporting and investigating but not making as many connections between the individuals Discussion <ul style="list-style-type: none">- Adding purchaser information on the bank draft, remitters name, account information, as well as the payee to make it less desirable- Privacy is a non-issue as cheques have the information on them- What does the OSFI say in regards to adding this information onto drafts- The use of nominee's- FINTRAC & STR searches could be helpful- How do you separate the legitimate gamblers from the money launderers/ criminals? CIBC & HSBC
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- Have the account number on their bank drafts, some financial institutions do not want to put the information on the drafts for privacy reasons
- Seems suspicious when customers want to remain anonymous

BCLC & GPEB

- Open sourcing/ completing background on big players
- Bank drafts are made out to either the person or the casino, if it is payable to the casino anyone is able to cash, if it is payable to the person only said person can cash
- Has the power to suspend a patrons play province wide
- Tracks account information for VIP players, checks behavioral patterns of their clients
- Would like to see standardized bank drafts, make bank drafts unusable for underground banks. Possible information on the bank draft: name, purchaser, account number, 'sourced to purchasers account', purchased from beneficiaries account, this way they can track money on the front end, comparing each bank draft individual players are bringing in
- Are focusing more on the person than the money, is this person related to criminal enterprises etc.

Information Sharing:

- Qualify of the information that has been shared to assess criminality at the beginning of an investigation for all parties
- Reference ROBINSONS presentation
- Each entity can govern themselves and their own investigations identifying the issues then share the information

FINTRAC Involvement

- FINTRAC searches rely on the individual financial institutions catching the money movement first
- Proactive disclosures through STR's, the financial institutions do not want to put Project ATHENA on the STR's, would prefer everything to be run/ requested through FINTRAC
- Lack of visibility effects the value of the data for BCLC sharing information to FINTRAC
- Narrow the details down time period, person, exact dollar amount

Law Enforcement:

- Want to know basic information in order to confirm whether the records/ accounts exist
- Means the banks will have to look at the account and file an STR if it is warranted
- FINTRAC initiative, avoiding a PO – how do we safeguard this process?

ACTION ITEMS/ ADVANCING PROJECT ATHENA

- Look into bank drafts, wires, e-transfers to see where people will move to after bank drafts
- Start lobbying for a legislative change now
- Protect legitimate customers and investigate flagged customers

How can we move forward?

- Peter GERMANs Report?
- Identifying valuable suspect names

- How do you locate the draft money, moving from the money backwards to figure out how the underground banks are receiving their funds
- How do we change the rules surrounding anonymity of bank drafts focusing more on the guaranteed funds aspect instead

Possible Meeting Themes:

- Client due diligence (knowing your people)
- Debit cards
- Professional money laundering
- Sourcing money
- Information sharing on processes
- Provide statistics on bank drafts being received by casinos
- Financial Institutions would like an overall picture in an operational alert showing what is normal vs what is criminal – possible case study example

Meetings

- Quarterly update
- Invite larger credit unions to attend ex. VanCity