

**COMMISSION OF INQUIRY INTO  
MONEY LAUNDERING IN BRITISH COLUMBIA**

**The Honourable Mr. Austin F. Cullen, Commissioner**

**AFFIDAVIT**

I, Baljinder (Bal) Bamra, with a business address of 2940 Virtual Way, Vancouver, BC, V5M 0A6, Manager, Anti-Money Laundering Intelligence for British Columbia Lottery Corporation, AFFIRM THAT:

1. I am the Manager, Anti-Money Laundering (“AML”) Intelligence for British Columbia Lottery Corporation (“BCLC”), and as such have personal knowledge of the facts and matters in this affidavit. Where I make statements in this affidavit that are not within my personal knowledge, I have identified the source of that information and belief. I believe that all of the information in this affidavit is true.
2. I have worked for BCLC in various roles since July 1998. In 2015 I joined the BCLC AML team, as Manager of Cash Alternatives and Special Projects. After approximately one year in that role there was a re-organization and my role transitioned into Manager of AML Intelligence.
3. As Manager of Cash Alternatives and Special Projects, I oversaw the development of BCLC’s cash alternative programs. As Manager of AML Intelligence, I oversee a team of analysts who provide information and analysis relevant to the operation and development of BCLC’s AML programs. My responsibilities also include oversight of compliance with FINTRAC and Gaming Policy and Enforcement Branch (“GPEB”) reporting obligations.
4. I report to the Director, AML and Investigations for BCLC (currently, Kevin deBruyckere).

**GPEB Investigation**

5. On July 4, 2019, I received an email from Sam Cooper, a reporter with Global News, asking for my comment on a GPEB investigation. Attached as **Exhibit “A”** is a true copy of an email chain, the originating email of which is the message I received from Mr. Cooper.
6. At the time I received the email from Mr. Cooper, I had no knowledge of the matters described in his message. Specifically, I had no knowledge of any complaint made against Robert Kroeker (former Vice President (“VP”) of Legal, Compliance and Security for BCLC), or of any related GPEB investigation. I did not know what Mr. Cooper’s email might relate to, and I did not respond to it. Instead, I forwarded the email to Daryl Tottenham (Manager of AML Investigations for BCLC) and Mr. deBruyckere.
7. After receiving my forwarded email, I learned from Mr. deBruyckere that he had made inquiries with GPEB and had confirmed that GPEB was investigating a complaint about Mr. Kroeker. I did not know the specific source of Mr. deBruyckere’s information, and I do not recall Mr. deBruyckere providing me with any more information about the specific nature of the complaint at that time. I do not recall hearing anything further about the matter until September 4, 2019, when Cary Skrine of the GPEB sent me an email to request that I participate in an interview. Attached as **Exhibit “B”** is a true copy of the September 4, 2019 email I received from Mr. Skrine.
8. In Mr. Skrine’s email (Exhibit “B”), he provided some more detailed information about the complaint about Mr. Kroeker, stating that “GPEB received an anonymous complaint on February 20, 2019 alleging that Rob Kroeker, VP Compliance of BCLC, instructed you and others in the AML Unit to “ease up” on cash conditions and “slow down” the process of targeting suspicious buy ins” (the “Complaint”).
9. My receipt of the email attached as Exhibit “B” from Mr. Skrine was the first time I recall learning about the specific allegations at issue in the Complaint, namely, that Mr. Kroeker had instructed myself and others to “ease up” on cash conditions and “slow down” the process of targeting suspicious buy ins (the “Alleged Instructions”). While I

do not recall having any other information about the Complaint at the time, beyond what was contained in Mr. Skrine's email, I was immediately certain that Mr. Kroeker had never given me the Alleged Instructions.

10. If Mr. Kroeker had given me the Alleged Instructions, or if I had learned he had given anyone else the Alleged Instructions, it would have been immediately noteworthy to me because it would have been contrary to the entire purpose and function of BCLC's AML program and strategy. My reaction would have been to strongly oppose the Alleged Instructions, and I would have immediately challenged Mr. Kroeker on them. There is no question in my mind that if Mr. Kroeker at any time gave the Alleged Instructions in my presence, or if I had learned of him giving the Alleged Instructions to anyone else, I would have a clear memory of it. I have no such memory. I am absolutely certain that it did not happen in my presence, and I am also certain that it did not come to my attention that he had given the Alleged Instructions to anyone else.
11. I participated in the GPEB interview requested in Exhibit "B", which was conducted by Cary Skrine and Richard Akin of GPEB. During that interview, I was provided with more details about the Complaint. I learned that the Alleged Instructions were alleged to have been made to me, Mr. Tottenham and Mr. Alderson at one of our meetings with Mr. Kroeker sometime between December 2016 and October 2017.
12. It was the usual practice of Mr. Kroeker, Mr. Alderson, Mr. Tottenham and myself to meet approximately monthly to review suspicious transaction reports ("STRs") from the past month and to discuss other AML matters. These meetings were referred to as "STR Monthly Trends Review" meetings. Some months we did not meet, because of scheduling conflicts among the group. Sometimes we met more frequently than monthly. These were the only meetings that the four of us would attend together on a regular basis to discuss AML issues (other BCLC employees would sometimes attend these meetings as well). I was responsible for preparing the agenda for these meetings, and for taking notes during the meetings.
13. My usual practice for the STR Monthly Trends Meeting was to print the meeting agenda, make handwritten notes during the meeting, and then, after the meeting, to type my

handwritten notes into the agenda document as a record of the meeting, and then destroy the handwritten notes. I consistently and without exception followed that practice for all STR Monthly Trends Meetings that I attended.

14. If Mr. Kroeker had given the Alleged Instructions at one of the STR Monthly Trends Meetings, or if he had otherwise made comments to that effect, I would have made a note of it and it would be reflected in the meeting notes described in paragraph 13 above.
15. I have reviewed all of my notes from the STR Monthly Trends Meetings that were held between December 2016 and October 2017 which I prepared in the manner described above in paragraph 13. I also included November 2016 in my review, as that meeting occurred toward the end of the month. Consistent with my recollection, none of the notes contain any reference to Mr. Kroeker giving the Alleged Instructions, or any similar comment(s). Attached as **Exhibits “C” to “M”** are true copies of these notes.
16. When interviewed by Mr. Skrine and Mr. Akin regarding the Complaint, I recall that they described for me Mr. Alderson's version of the circumstances of the Alleged Instructions. After hearing their more detailed description of Mr. Alderson's version of events I was, and I remain, adamant that Mr. Kroeker never, in my presence, gave the Alleged Instructions.
17. I make this Affidavit for use in the Cullen Commission of Inquiry into Money Laundering in British Columbia, and for no other purpose.

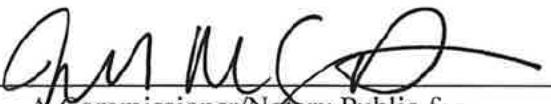
AFFIRMED BEFORE ME at Vancouver, )  
British Columbia, on 14/OCT/2020. )  
  )  
  )  
  )  
  )

  
A commissioner for taking affidavits for  
British Columbia )

  
BALJINDER BAMRA )

JENNIFER SMITH  
Senior Legal Counsel  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

THIS IS EXHIBIT "A" TO THE  
AFFIDAVIT OF BALJINDER BAMRA  
AFFIRMED BEFORE ME AT VANCOUVER, BC  
THIS 14<sup>TH</sup> DAY OF OCTOBER, 2020



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the Province of British Columbia

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2940 Virtual Way  
Vancouver, BC V5M 0A6

**To:** Kevin deBruyckere [REDACTED]  
**Cc:** Daryl Tottenham [REDACTED]  
**From:** Bal Bamra  
**Sent:** Thur 2019-07-04 5:09:22 PM  
**Subject:** Fwd: GPEB investigation into former manager at BCLC

;So, just got this and have no idea what this is about...

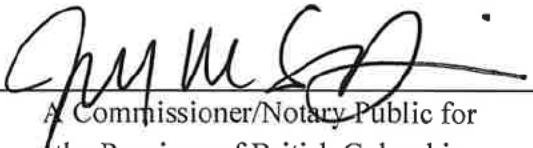
Sent from my iPhone

Begin forwarded message:

**From:** Sam Cooper [REDACTED]  
**Date:** July 4, 2019 at 9:41:47 AM PDT  
**To:** [REDACTED]  
**Subject:** GPEB investigation into former manager at BCLC

Hi Bal Bamra, i have obtained a copy of the complaint against Robert Kroeker that says you were involved in a meeting, and GPEB docs that confirm an investigation into this complaint, I'm trying to reach you for comment and to confirm and question certain allegations, please respond to me at 343 996 2486 if you can comment. Sam Cooper

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Vancouver, BC V5M 0A6

**From:** Skrine, Cary J GPEB:EX <**PERSONAL INFO**>  
**Sent:** September 4, 2019 3:01 PM  
**To:** Bal Bamra <**PERSONAL INFO**>  
**Cc:** Kevin deBruyckere <**PERSONAL INFO**>  
**Subject:** GPEB INV# 103684 - R. Kroeker - Allegations of Inappropriate Interference with BCLC AML Policies and Procedures

Good afternoon Bal,

It is my understanding the media reached out to you sometime ago on the above noted subject so I don't anticipate this email comes as a shock. GPEB received an anonymous complaint on February 20, 2019 alleging that Rob Kroeker, VP Compliance BCLC, instructed you and others in the AML Unit to "ease up" on cash conditions and "slow down" the process of targeting suspicious buy ins. As you have been identified as a potential witness in this matter, I would like an opportunity to interview you. I will be in Vancouver next week and I'm wondering if you would be available to meet at 1100 hours on September 12, 2019, at GPEB's Burnaby Office on Kingsway. I anticipate the interview will take about 90 minutes.

Please confirm your availability and give me a shout if you have any questions.

Cary

*Cary Skrine*

Executive Director  
Enforcement Division  
Gaming Policy & Enforcement Branch  
Ministry of the Attorney General  
#200 - 1517 Water St. Kelowna, BC V1Y 1J8  
Office **PERSONAL** Fax (250) 861-7362  
Cell **PERSONAL**

*If you believe that you have received this email in error, please notify the sender and delete the email from your mailbox.*

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## STR Monthly Trend Review Meeting

**Date:** November 21, 2016

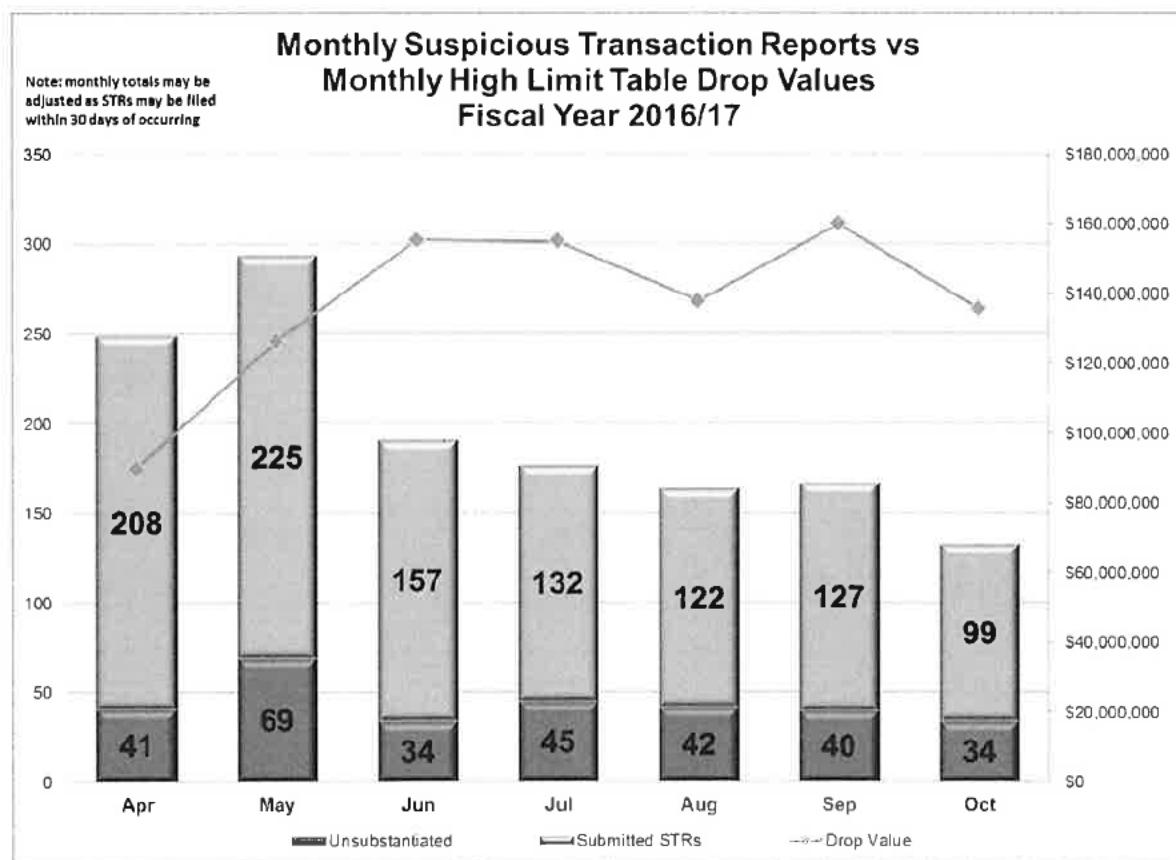
**Participants:** Bal Bamra  
Daryl Tottenham  
Rob Kroeker  
Ross Alderson

**Time:** 12:30 pm – 1:00 pm

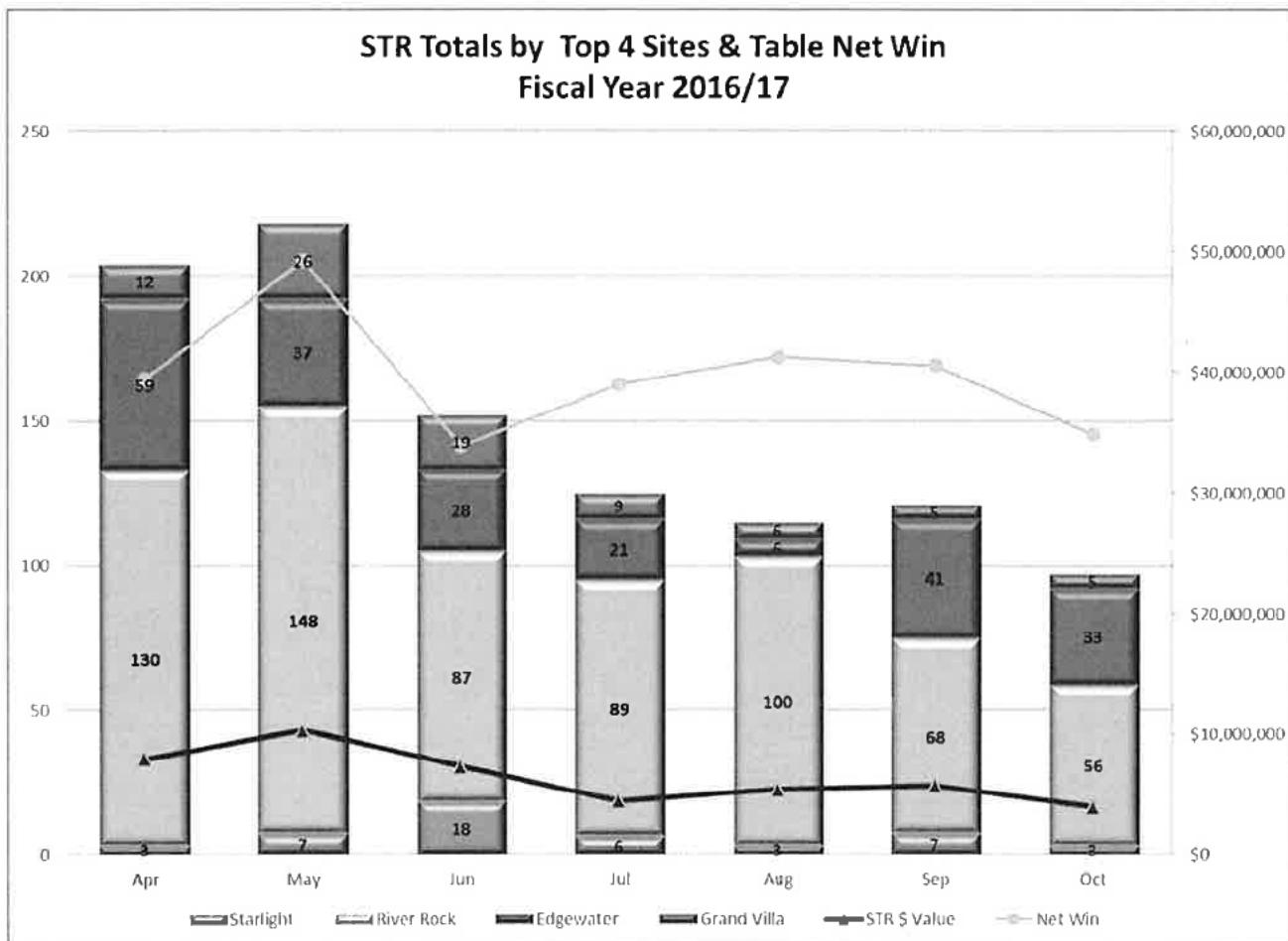
**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

### Minutes

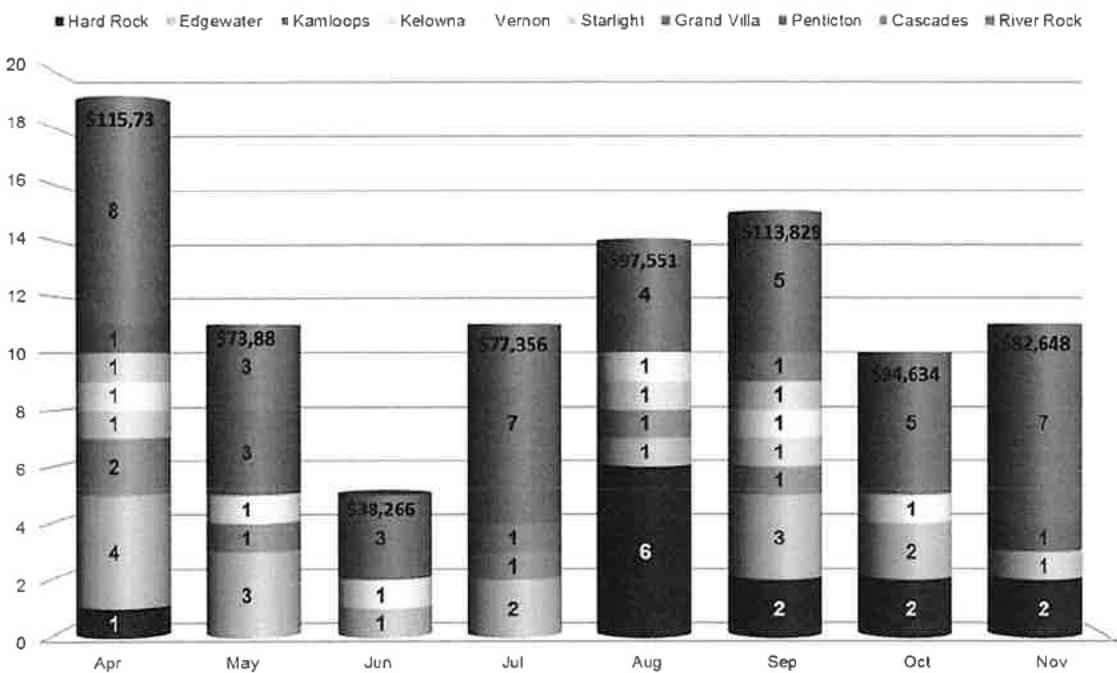
#### STR Trends



## STR Monthly Trend Review Meeting



**STR Monthly Trend Review Meeting**  
**Convenience Cheques Issued**  
**Fiscal Year 2016/17**  
**Total Dollar Value = \$693,900**  
**Total Cheques Issued = 96**

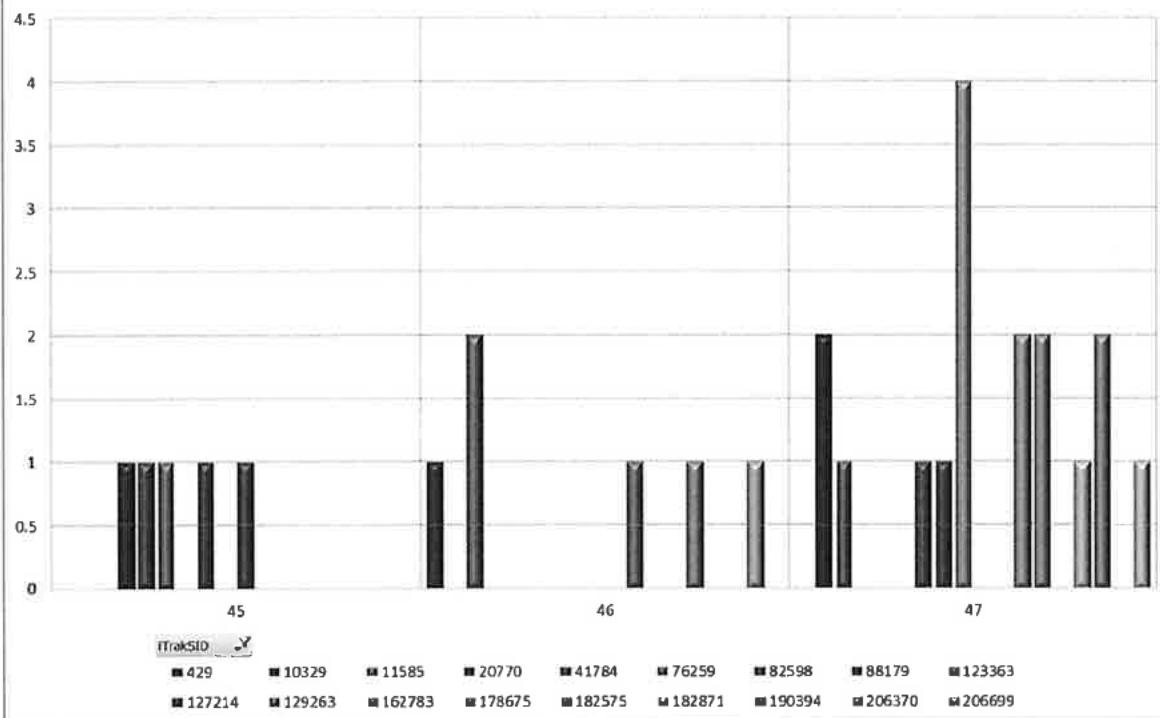


No cheques over \$10,000 issued since implementation of new options.

## STR Monthly Trend Review Meeting

Count of Amount

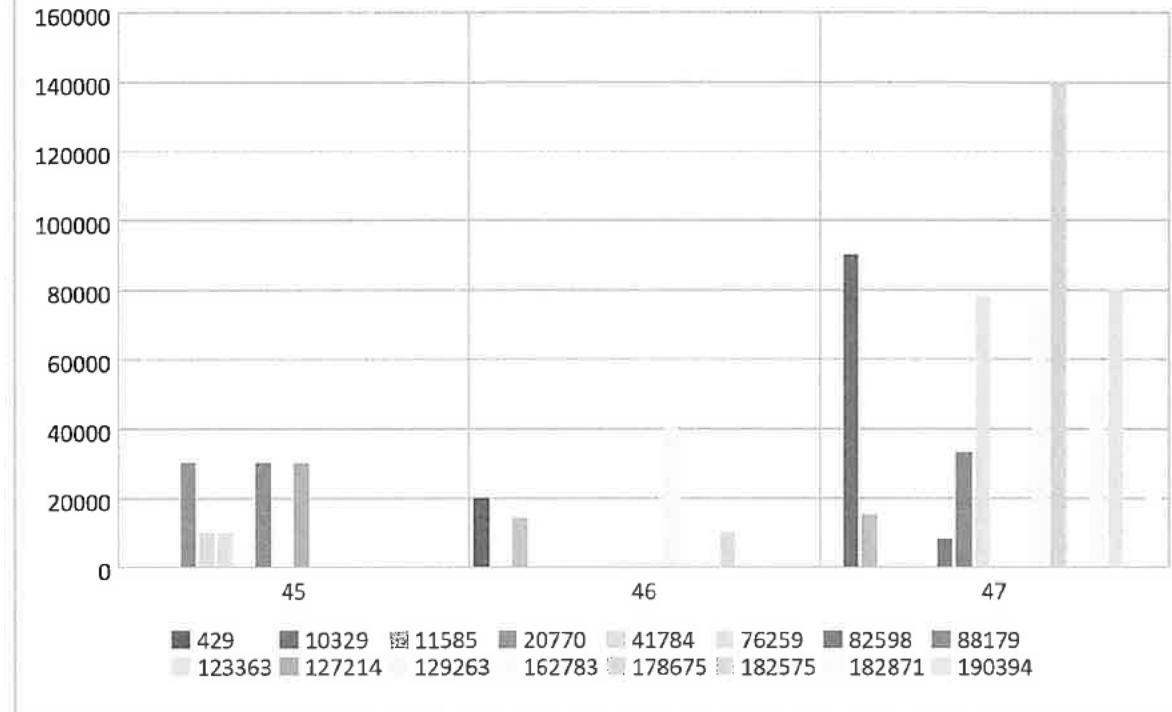
### Bank Draft/Certified Cheque Report Nov 2 - 20, 2016



## STR Monthly Trend Review Meeting

## Bank Draft/Certified Cheque Report

**Nov 2 - 20, 2016**

**Minutes:**

- Reviewed above graphs, STR's heading in the right direction;
- If player pattern changes, we should pass that information on to gamesense while looking at the information collected from a privacy perspective (collecting information and only using it for the purpose of collection) – Ross to arrange a formal meeting with Kaleel to discuss.
- Discussed the 97 conditioned players of pre and post play since conditions:
  - FINTRAC drop values from April 2015 – July 2016 reviewed
  - 52 players (54%) have not been active after receiving conditions
  - 45 players (46%) returned with change in play (32 people decreased play/13 increased)
  - Pre Conditions the drop was \$41,563,756
  - Post Conditions the drop was \$21,501,743 with a difference of -48%

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**JENNIFER SMITH**  
**Senior Legal Counsel**  
**British Columbia Lottery Corporation**  
**2940 Virtual Way**  
**Vancouver, BC V5M 0A6**

## STR Monthly Trend Review Meeting

**Date:** December 21, 2016

**Participants:** Bal Bamra  
Daryl Tottenham  
Rob Kroeker  
Ross Alderson - Absent

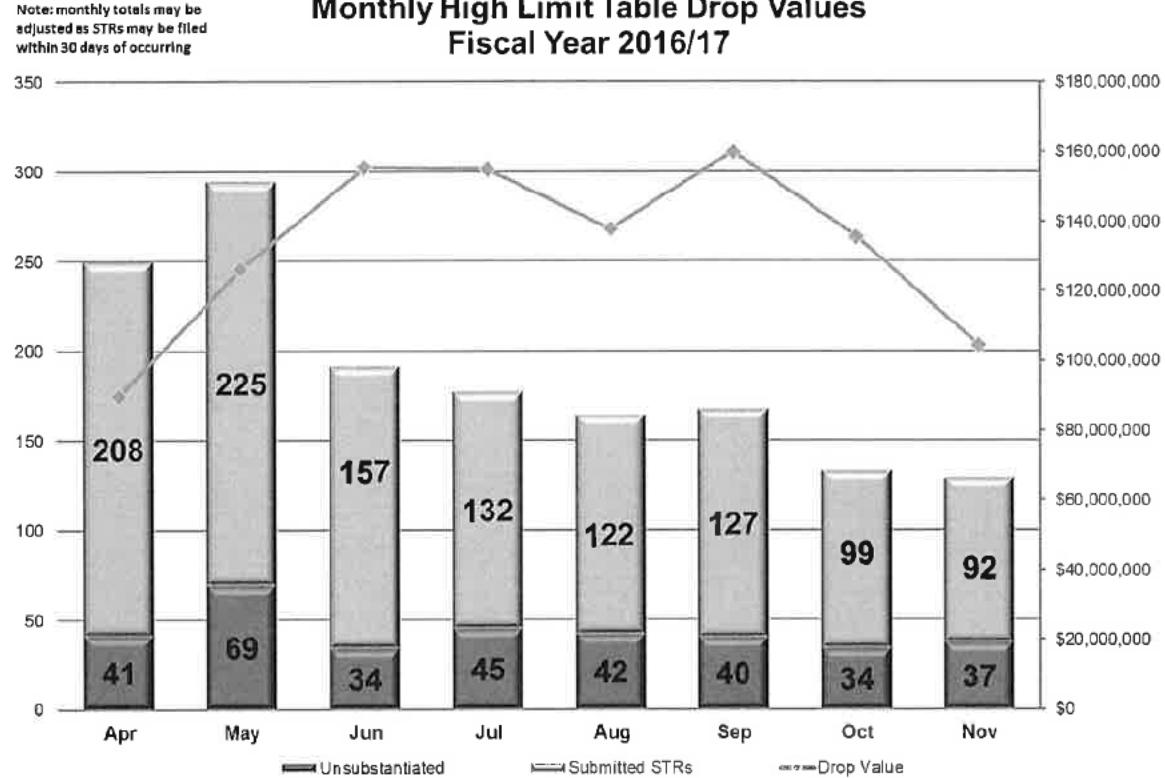
**Time:** 9:00 a.m. – 9:30 a.m.

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

### Minutes

#### STR Trends

### Monthly Suspicious Transaction Reports vs Monthly High Limit Table Drop Values Fiscal Year 2016/17



**Minutes:**

**STR Monthly Trend Review Meeting**

- Trend is stable, STR continues to be reducing. Revenue has dropped, but not necessarily due to the STR's;
- Sites have improved documentation on UFT's and are doing appropriate due diligence;
- [REDACTED] **Redacted - RCMP**
- Discussed that anyone with a firm link to [REDACTED] PERSONAL INFORMATION be assessed and removed as a business relationship;
- Update on convenience cheques/international EFT's – both options not used yet;
- In an effort to provide better business for Chinese New Year, have a meeting with the SP's to have their clients convert to bank drafts for better service;
- Chip liability – all sites except River Rock are able to provide information on chip liability and who owns what chips. River Rock will provide a new process for approval by mid-January;
- iView BI tool – Dan Thompson going through the training first, followed by Brad and Cathy, and then will release to the rest of the investigators;
- For future, we should schematically lay out what we think we are doing and outline typologies that we are worried about and triggers not working as they should;
- ACAMS – changing to sixth edition after May 2017, so everyone should take their exams before then;
-

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## STR Monthly Trend Review Meeting

Date: January 16, 2017

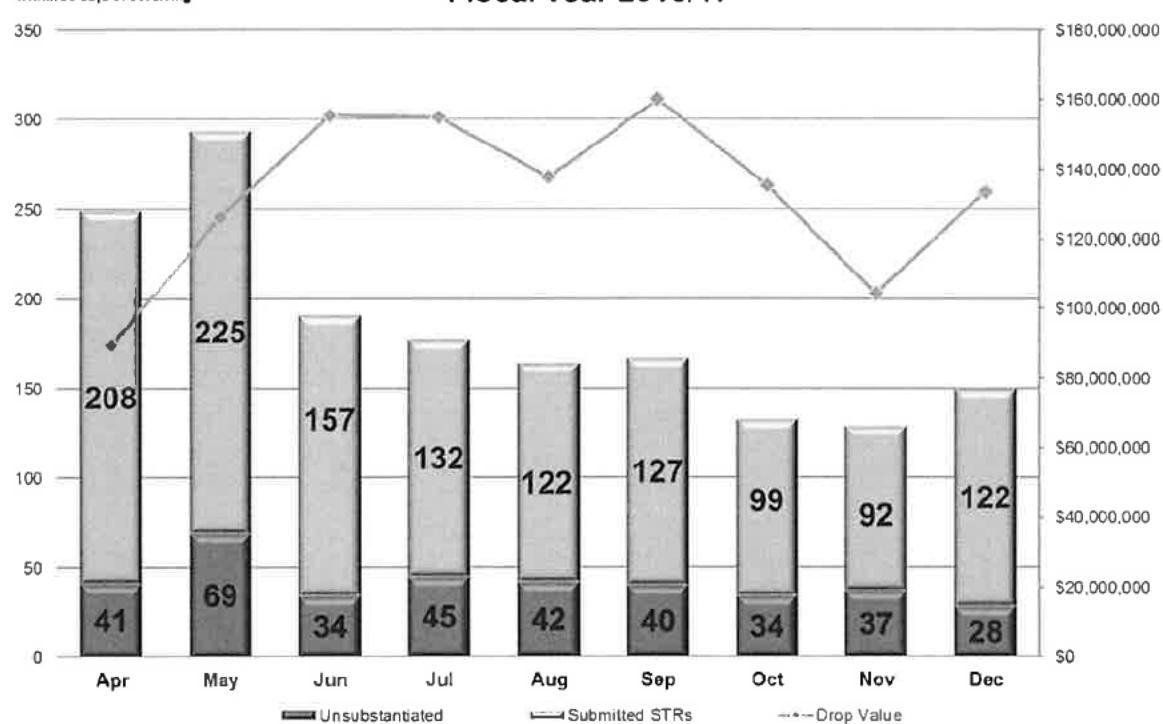
**Participants:** Bal Bamra  
Daryl Tottenham  
Kris Gade  
Ross Alderson  
Laird Robinson

Time: 10:00 am – 11:00 am

## Agenda

### STR Trends

#### Monthly Suspicious Transaction Reports vs Monthly High Limit Table Drop Values Fiscal Year 2016/17



### Open Discussion

- Cascades – AML/STR training – Daryl reviewing
- Compliance has changed their reviews:
  - OGC reviewing all iTrak files at their sites;
  - Looking at different things/categories/timeliness/broader scope
  - Building an awareness program in Q1 2017 for Security and Casino Managers about what's happening in their regions.
- GPEB meeting went well with Leadership team:
  - Any STR related information shall go thru JIGIT;

**STR Monthly Trend Review Meeting**

- Ross working on protocol documentation on requests;
- 2016 Yearly Report to be sent to Ross;

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Senior Legal Counsel  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

## STR Monthly Trend Review Meeting

**Date:** January 18, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Ross Alderson  
Rob Kroeker

**Time:** 8:30 am – 9:00 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

## Agenda

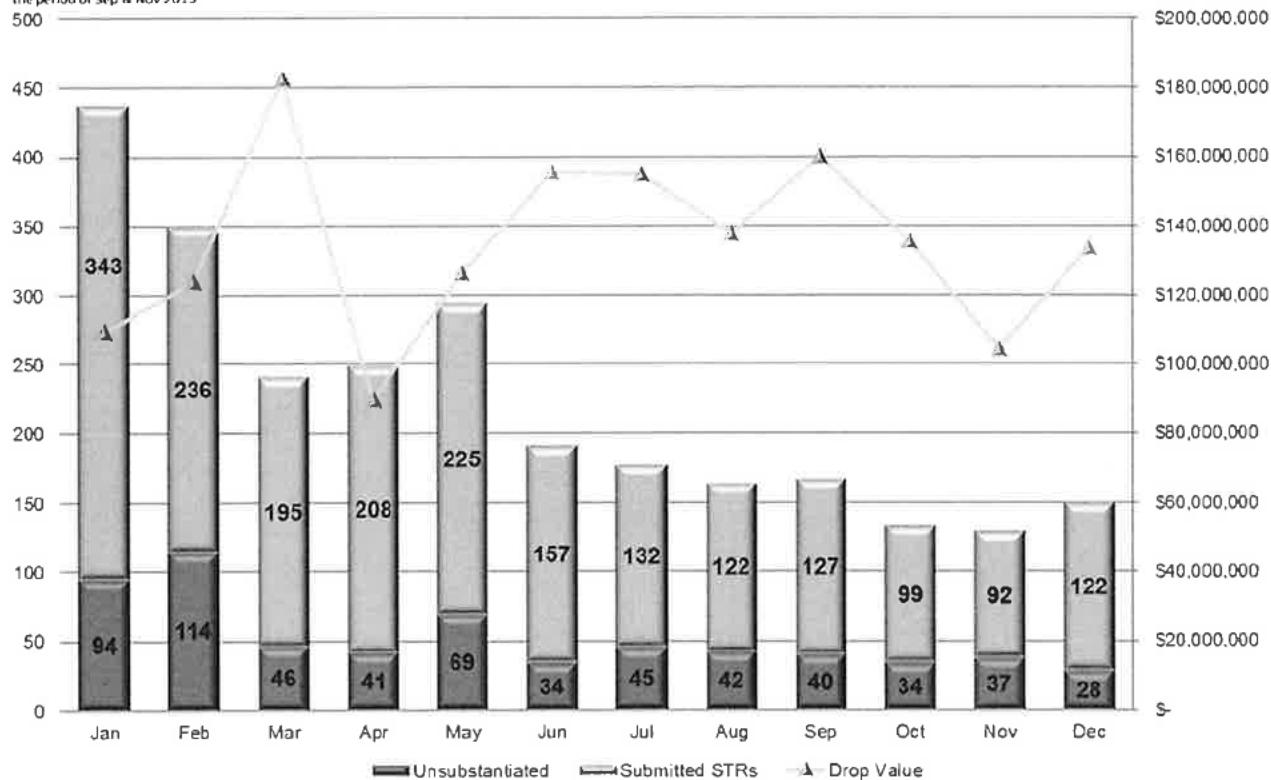
### Outstanding Items:

- Information to Gamesense if player pattern changes – Ross to discuss with Kaleel

### STR Trends

#### Monthly Suspicious Transaction Reports vs Monthly High Limit Table Drop Values Calendar Year 2016

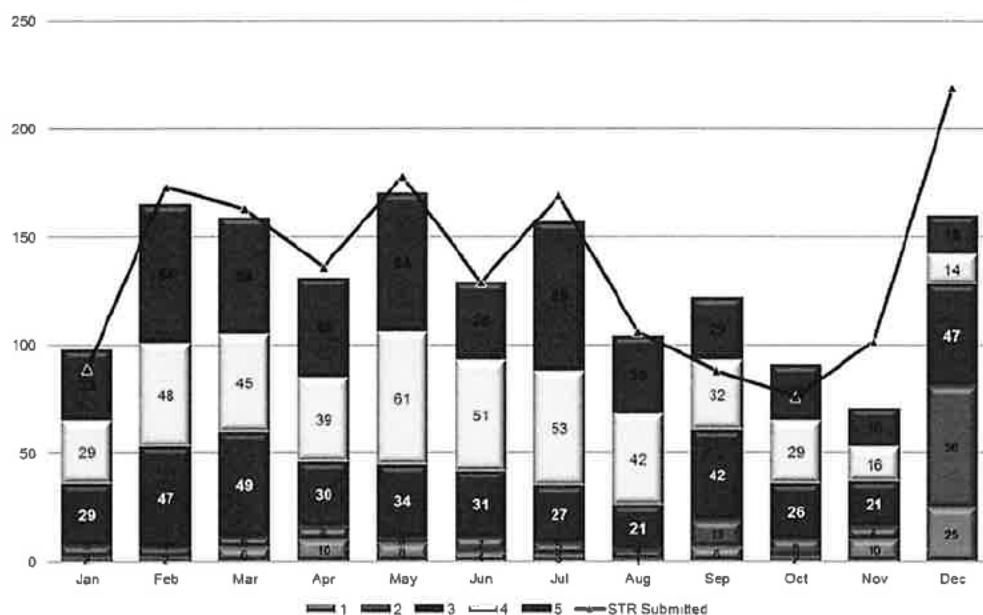
*Please note: Jan 2016 includes 176 historical River Rock reports for the period of Dec 2014 to Aug 2015.  
Feb 2016 includes 21 historical River Rock reports for the period of Sep & Nov 2015*



### STR Monthly Trend Review Meeting

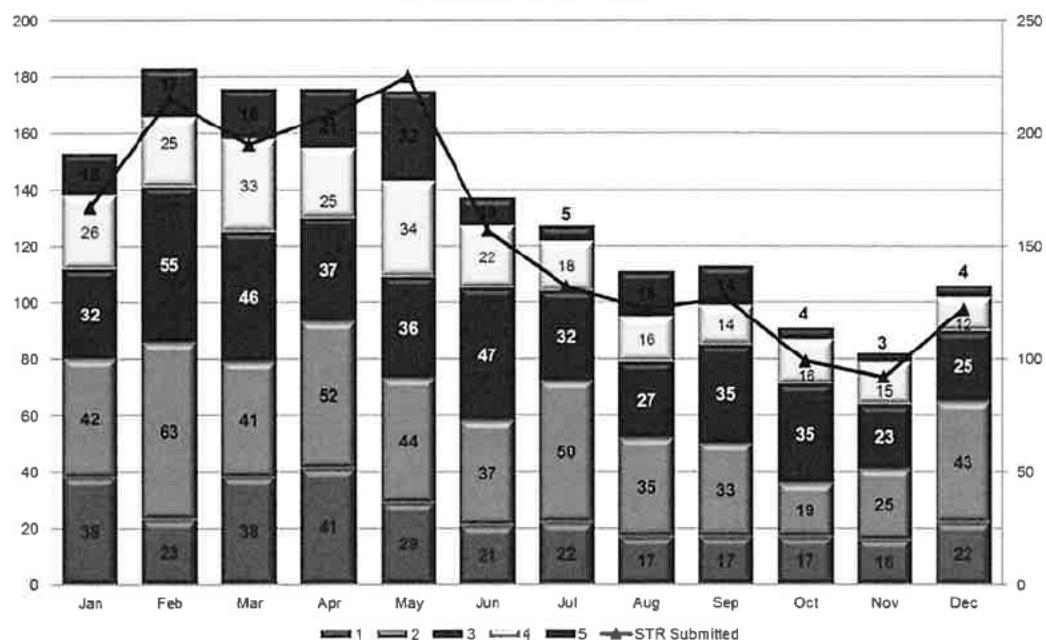
Legend  
 Green: \$10,000 & under  
 Blue: \$10,001-\$25,000  
 Gray: \$25,001-\$50,000  
 Brown: \$50,001-\$100,000  
 Yellow: \$100,001& over

#### Monthly STR Dollar Amount Categories vs STR Reports Submitted Calendar Year 2015



Legend  
 Green: \$10,000 & under  
 Blue: \$10,001-\$25,000  
 Gray: \$25,001-\$50,000  
 Brown: \$50,001-\$100,000  
 Yellow: \$100,001& over

#### Monthly STR Dollar Amount Categories vs STR Reports Submitted Calendar Year 2016

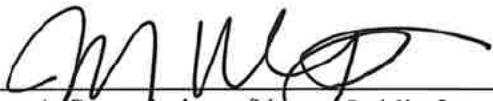


- GPEB Slot Review
  - Review Report Submitted by GPEB
    - Good document to review with Anna for discussion;

**STR Monthly Trend Review Meeting**

- Courtesy to have known that they were conducting this audit;
- BCLC could have provided help had we known.
- Update on RFQ for Money Laundering Efficiency on Slot Machines
  - Sent to Deloitte, EY, KPMG, IPSA
  - Jan 20, 2017 – Closing date for questions
  - Jan 26, 2017 – Close date for final submission
- U.S. Casino Cheques Review
  - Review Prepared Package
    - Package is good to proceed;
    - Tulalip will be the first casino – establishing contacts via Edgewater
    - We should periodically revisit files every 36 months; adverse findings should be continuous;
- JGIT Information
  - Overview

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**British Columbia Lottery Corporation**  
**2940 Virtual Way**  
**Vancouver, BC V5M 0A6**

Meeting: STR Committee

Date: March 13, 2017

Time: 0900-0930

Room: Van-R2

Attendance: Kris Gade, Bal Bamra, Daryl Tottenham, Ross Alderson, Kevin Sweeney (By Phone), Brandi Chan

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#### FEB 2017

- 112 STRs in Feb, most likely due to Chinese New Year
- Not all substantiated files were from regular players in Feb
- Cash Conditions re: Chinese New Year
  - 5 players put on conditions; 4 related to buy-ins; 1 not related to buy-in

#### UNSUBSTANTIATED UFTs

- Average of 16-20 files
- Dec 2016: 16 files; Jan 2017: 47 files; Feb 2017: 68 files
- Spikes in UFT can be caused by unknown SOF that are later unsubstantiated via AML verification
  - Turnaround time from UFT to AML verification is approximately 3 days
  - Latest turnaround is 7-8 days
  - If delay in turnaround, investigator reminded to pull and save footage

#### STR TEMPLATES

- Completed and in use; Increased efficiency

#### PGF & LCT REVIEW

- Completed in Feb 2017

#### AML PROGRAM REVIEW

- Tentative April 2017
- Focus: CSR & High Risk reviews and strengthen identification procedures (how to report & who to report)
- Refer to PWC Manual for review methods
- Monthly site checks; Quarterly review

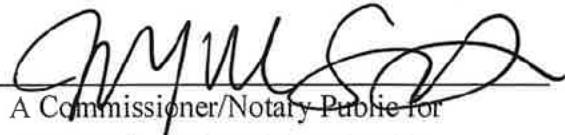
#### EDGEWATER COMPLIANCE ISSUE

- Identified by Rick Tsang
- Review casino procedures on how wins are verified

#### FOLLOW-UP

- With Brad/Cathy re: average dollar threshold of STRs

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**2940 Virtual Way**  
**Vancouver, BC V5M 0A6**

## STR Monthly Trend Review Meeting

**Date:** March 23, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Ross Alderson  
Rob Kroeker

**Time:** 8:30 am – 9:00 am

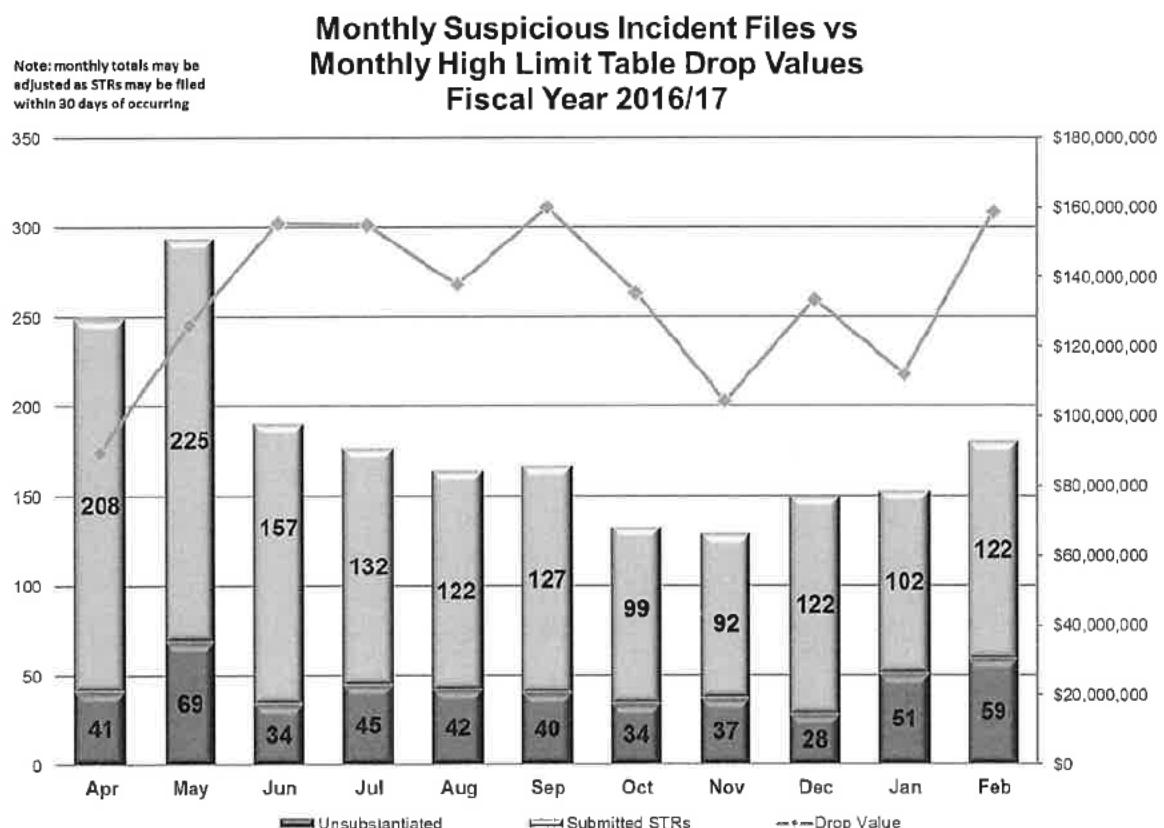
**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

## Agenda

### Outstanding Items:

- None

### STR Trends



- Jan - \$2,916,470      Feb - \$5,798,470
- Conditioned Players

### STR Monthly Trend Review Meeting

- 4 players put on conditions
  - **PERSONA** SID#148747
  - **PERSO** SID#163839
  - **PERSONAL** SID#13038
  - **PERSONAL INFO** SID#77316
- IPSA – Going through data collection
- VRQ for Independent Audit – Completed and sent to procurement for review.
  - Added in verbiage around records not related to statutory regulations should be noted in a separate document;
  - Cannot not take data offsite
- Other
  - Zanders Report
    - Cash conditions aligned with some of the dips noted in the document
  - Camera needed at River Rock to cover blind spots for cash drop offs
  - Encourage Joe (Paragon) to get personalized chips for the top 20 players when new casino opens
  - Chip Tracking – Being diligent in following up with the sites to provide us counts and to ensure their tracking is working

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Vancouver, BC V5M 0A6

## STR Monthly Trend Review Meeting

**Date:** July 19, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Ross Alderson  
Rob Kroeker

**Time:** 8:30 am – 9:00 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

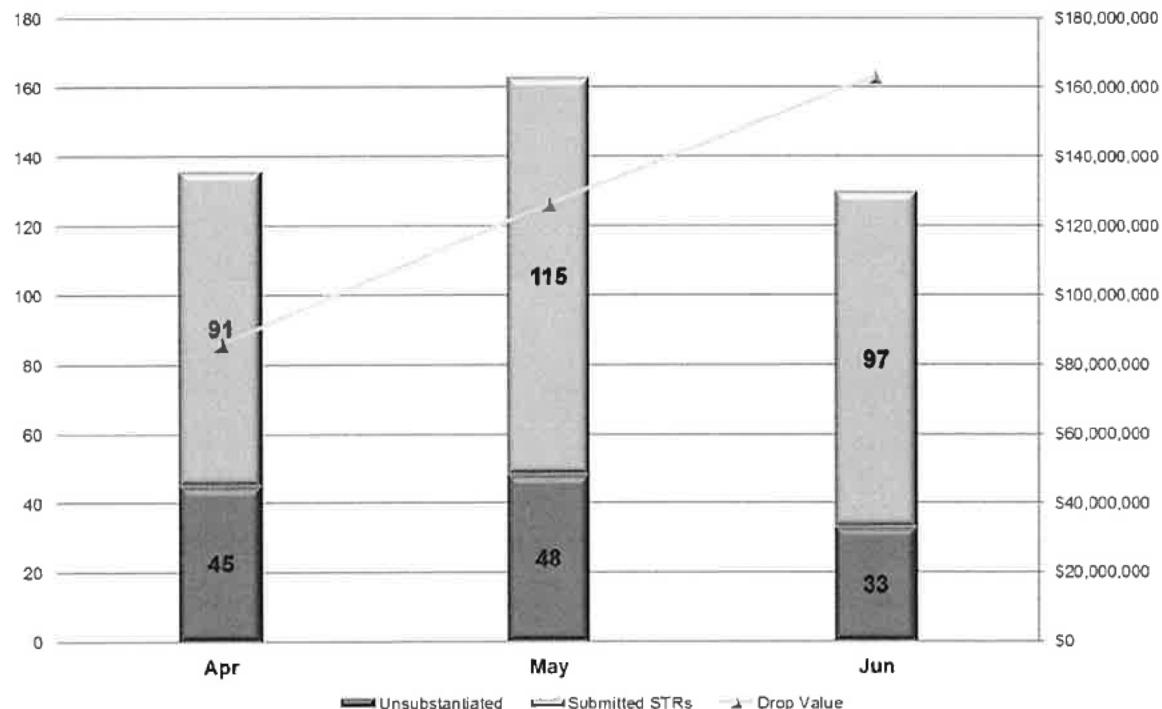
## Agenda

### Outstanding Items:

- None

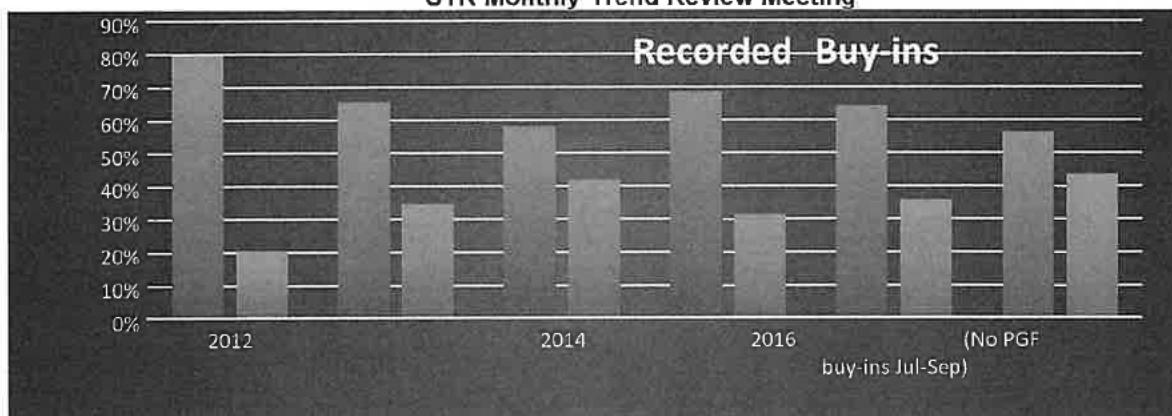
### STR Trends

**Monthly Suspicious Incident Files vs  
Monthly High Limit Table Drop Values  
Fiscal Year 2017/18**

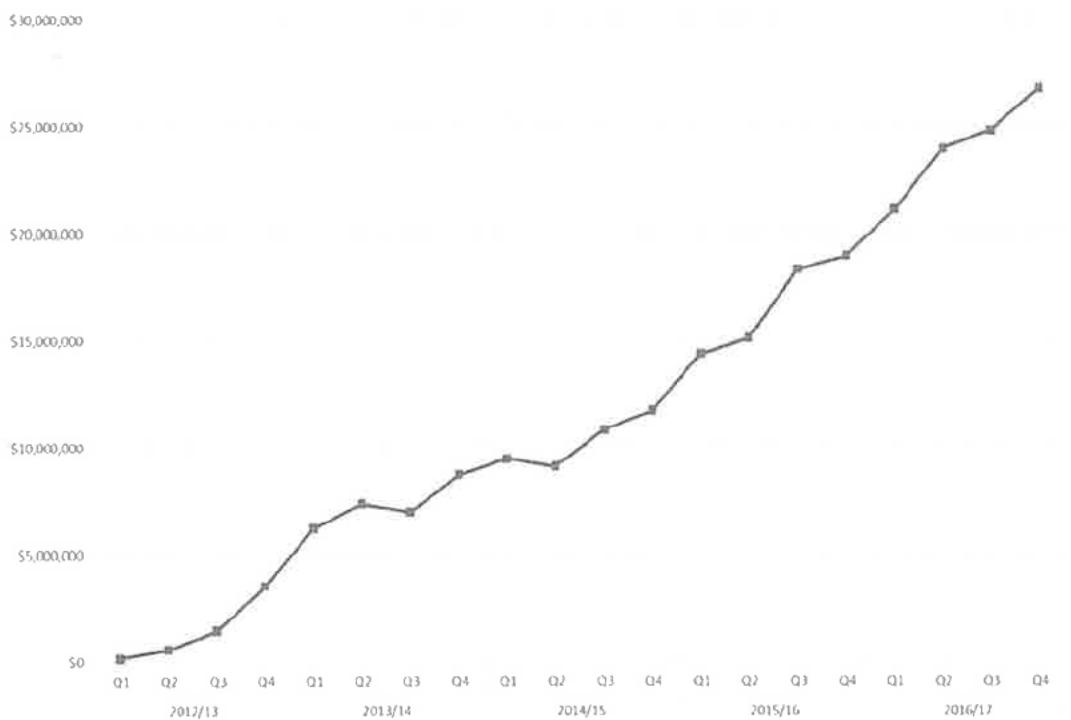


Calendar Year (Confidence Level in Data 90%)

### STR Monthly Trend Review Meeting



### *Debit at the Cash Cage Quarter Totals by Fiscal Year*



*Assumption: All debit at the cage ends up as table or slot drop*

- Discuss the use of “agent” in policy as it could be interpreted to allow junket type operations
  - Discuss with Bonnie to change wording on this as this could mean junket operations.
- Acceptance of U.S. Cheques
  - Discussed reviewing this process for upcoming AML SP Meeting.
- EFT Process – Concerns from Patrons of its lengthy process
  - Cannot alter this process as not driven by us, but FINTRAC requirements and bank procedure.

### STR Monthly Trend Review Meeting

#### Follow Up Items:

- Rob to reach out Gary Bean to start information sharing agreement with them.
- Possible to do one sharing agreement with Alberta, BC, OLG and Quebec.
- Bal – work on determining incoming cash from table drop minus PGF activity, bankdrafts etc.

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A Commissioner/Notary Public for  
the Province of British Columbia

JENNIFER SMITH  
Senior Legal Counsel  
British Columbia Lottery Corporation  
2940 Virtual Way  
Vancouver, BC V5M 0A6

## STR Monthly Trend Review Meeting

**Date:** August 16, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Ross Alderson  
Rob Kroeker

**Time:** 8:30 am – 9:00 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

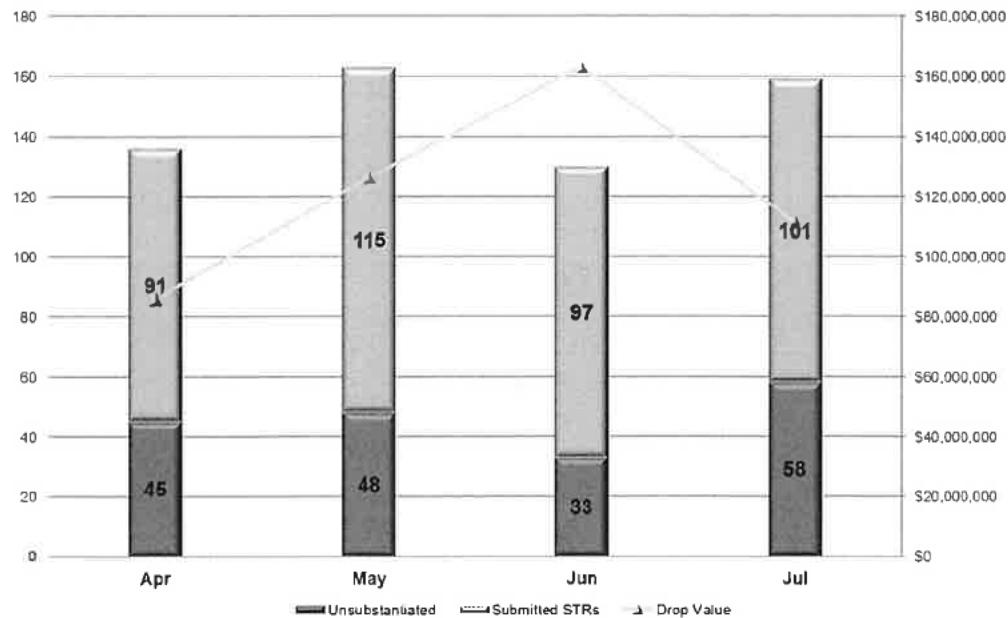
## Agenda

### Outstanding Items:

- The word "agent" in policy will be amended for the next NTI set to release mid September.
- Rob: reach out to Gary Bean to start information sharing agreement for Alberta, BC, OLG and Quebec  
Still working on this.
- Still working on graph to determine incoming cash vs. cash alternatives Still working on this.

### STR Trends

**Monthly Suspicious Incident Files vs  
Monthly High Limit Table Drop Values  
Fiscal Year 2017/18**



- **Numbers above probably reflective of recycled cash coming back**
- Seasonal players high cash volume with small bills AML strategy around this is sound; We interview (new players) those coming in with large amounts of cash, cash condition them until we are satisfied with source of funds.

THIS IS EXHIBIT "K" TO THE  
AFFIDAVIT OF BALJINDER BAMRA  
AFFIRMED BEFORE ME AT VANCOUVER, BC  
THIS 14<sup>TH</sup> DAY OF OCTOBER, 2020



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## STR / Cash Conditions Monthly Trend Review Meeting

**Date:** September 14, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Kris Gade

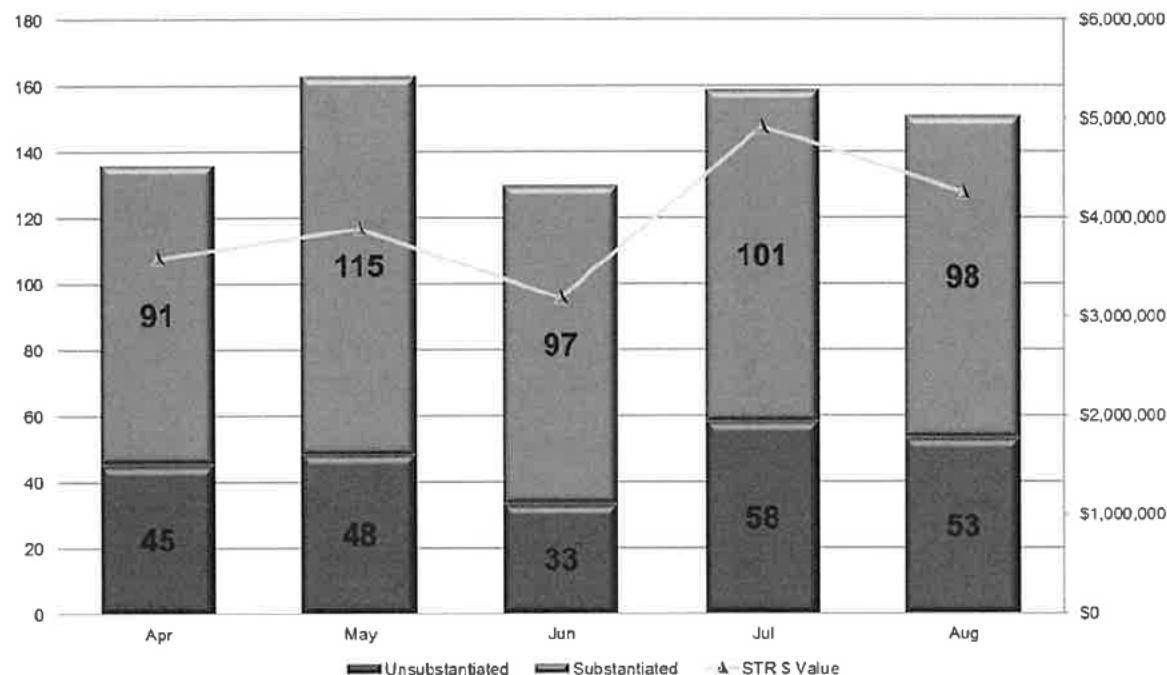
**Time:** 10:00 am – 10:30 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

## Agenda

### STR Trends

#### Substantiated Suspicious Incident Files vs Unsubstantiated & STR Dollar Value FY 2017/18



- Cash Conditions Update – Daryl
  - PERSONAL SID 53993
  - INFO SID 100933
  - PERSONAL SID 183791
  - PERSONAL SID 143825
  - PERSONAL SID 170466
  - PERSONAL – suspected drug trafficker

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## STR / Cash Conditions Monthly Trend Review Meeting

**Date:** September 21, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Ross Alderson  
Rob Kroeker

**Time:** 8:00 am – 8:30 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

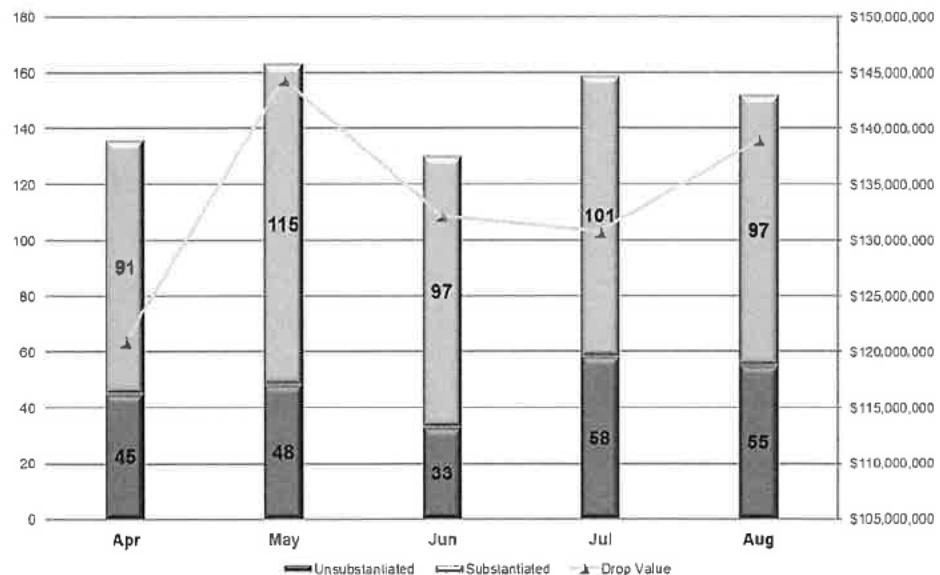
## Agenda

### Outstanding Items:

- Information sharing agreement for Alberta, BC, OLG and Quebec
- Cash vs. Cash alternative graph- working on getting numbers to try and break this down further

### STR Trends

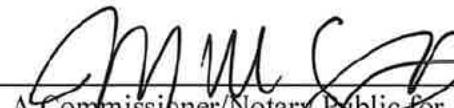
**Monthly Suspicious Incident Files vs  
Monthly High Limit Table Drop Values  
Fiscal Year 2017/18**



### New items:

- Banning of law enforcement targets and STR filings

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Vancouver, BC V5M 0A6

## STR / Cash Conditions Monthly Trend Review Meeting

**Date:** October 31, 2017

**Participants:** Bal Bamra  
Daryl Tottenham  
Rob Kroeker

**Time:** 7:30 am – 8:30 am

**Objective:** Assess overall compliance with statutory and regulatory requirements for monitoring, detecting and reporting suspicious activities. Review transactional and player behaviour reports for trending, decision making and future actions.

## Agenda

### **Outstanding Items:**

- Information sharing agreement for Alberta, BC, OLG and Quebec
- Cash vs. Cash alternative graph- working on getting numbers to try and break this down further

### **New items:**

- STR remains status quo, no new information to share
- Cash Conditions- Patrons buying in with \$50,000 will be on cash conditions pending interview; all sites have been informed
- EY Audit – updates
- Letter to GPEB - Compliance Managers at each site will be held accountable for accepted cash buy-ins should it be accepted by GPEB
- PGF Bank draft update – directive to include that patrons must bring in a receipt that states their name, amount and account number if feasible with their bank draft; and PGF accounts will remain closed until a 6 month period has passed to avoid people opening and closing based on promotions.
  - AML Unit will provide training sessions at all sites who have PGF accounts (train the trainer); coordinate sessions where compliance managers, cage staff, surveillance and tables to attend and track who attended
  - Solidify plan by Friday with Rob and John – set up meeting
  - Set up training sessions for November 20 – 24, implement bank draft directive for Dec 4, 2017
- FINTRAC meeting update – Business as usual, there appears to be little concern from FINTRAC around what is being said in the media
  - Next years audit will be around "online" component
  - Daryl to follow up with Dan on 365 files that had extraction/production issues
  - FINTRAC did mention to pay attention to bank draft convergence from a particular institution – will amend how this is recorded by site so we can pull this information
  - Reasonable Measures follow up will done by John when he gets settled in
- Alerts – We have two new alerts now from SAS BI, one to alert when a prohib ban is expiring, and the other to alert when a patron has had multiple buy-ins at multiple sites from a 7 day window that the AML unit is monitoring