

From: [Lawson, Liam FIN:EX](#)
To: [Robb, Katie GCPE:EX](#)
Subject: FW: To-do list (to send to comms shops ASAP)
Date: May 2, 2019 3:15:03 PM

Concerns??

From: Marriott, Sarah GCPE:EX

Sent: May 2, 2019 3:01 PM

To: Gibbs, Robb GCPE:EX ; Finn, Heather GCPE:EX ; Harder, Derrick AG:EX ; Smith, Jessica C AG:EX ; Lawson, Liam FIN:EX ; Smith, Jimmy GCPE:EX ; Smith, George PREM:EX

Subject: To-do list (to send to comms shops ASAP)

Hi all,

Thanks for connecting today.

Below is the list of materials for next week's announcements. Can you please send this breakdown to your comms shops ASAP? The deadlines are very tight.

All materials will be taken care of by the listed lead GCPE shop, unless otherwise indicated. Heather Finn is available to support the comms shops as well.

Feel free to give me a ring if you have any comments or additions,

Sarah

Sarah Marriott

Issues Manager

250.361.8416

Horses & cars – May 7 (MDE)

- Lead: **AG GCPE**
- Materials:
 - NR & KMs
 - Speaking notes if MDE will want them – at a minimum will need KMs in front of him
 - Very short KM - **Sarah**
- Deadlines:
 - End of day Friday, May 3 for first draft from GCPE
 - Sunday, May 5 for draft from MDE to be edited by GCPE HQ

Full German & Maloney – May 9 (MCJ & MDE, plus German & Maloney)

- Lead: **Finance GCPE**, supported by AG GCPE and Heather
- Materials:
 - KM, NR, QA
 - SNs for MCJ and MDE
 - Tech briefing deck
 - Backgrounder / report highlights
 - German – **Jessica** (understand you're working on this Jess?)
 - Maloney – **Liam & James**
 - German & Maloney's speaking notes – **German & Maloney (to be reviewed by their respective MOs)**
- Deadlines:
 - End of day Monday, May 6 for all government materials
 - End of day Tuesday, May 7 for German and Maloney's speaking notes

Comms plan for all announcements – **Robb & Heather / GCPE HQ**

From: [Robb, Katie GCPE:EX](#)
To: [Lawson, Liam FIN:EX](#)
Subject: RE: To-do list (to send to comms shops ASAP)
Date: May 2, 2019 3:41:44 PM

I think my preference would be the morning – that may be preferable for MCJ as she won't be in the middle of house business?

Also I'm wondering if she'd like some time to review and input into the materials in person/review speaking notes and what not. I'm happy to attend/support however you think makes sense before Thursday.

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Lawson, Liam FIN:EX

Sent: Thursday, May 2, 2019 3:30 PM

To: Robb, Katie GCPE:EX

Subject: RE: To-do list (to send to comms shops ASAP)

If she's still in estimates, which we should assume, it'll have to be 12:00-1:00pm, other option would be before 10:00am when the house isn't sitting yet

L

From: Robb, Katie GCPE:EX

Sent: May 2, 2019 3:27 PM

To: Lawson, Liam FIN:EX

Subject: RE: To-do list (to send to comms shops ASAP)

You got it – any calendar restrictions for MCJ to be aware of? I'm guessing this will all kick off shortly after QP. But she's in estimates so...we can work around her window?

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Lawson, Liam FIN:EX

Sent: Thursday, May 2, 2019 3:23 PM

To: Robb, Katie GCPE:EX

Subject: FW: To-do list (to send to comms shops ASAP)

Rough idea on process, could your team put together a draft tick tock for event?

Embargoed briefing with German: time with report and QA, x minutes, German leaves

Embargoed briefing with Maloney and panel: time with report and QA, x minutes

Announcement/official release of reports (no panel or German present)

Reports go live online

Eby begins outlines action taken on previous report, summary of German report, points to/thanks

MCJ on LOTA legislation, hands off to MCJ

MCJ speaks on report from panel, takes first questions

Hands off to Eby to take later questions

From: Marriott, Sarah GCPE:EX

Sent: May 2, 2019 3:01 PM

To: Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>; Finn, Heather GCPE:EX

<Heather.Finn@gov.bc.ca>; Harder, Derrick AG:EX <Derrick.Harder@gov.bc.ca>; Smith, Jessica C AG:EX <Jessica.C.Smith@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>

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Sarah Marriott

Issues Manager

250.361.8416

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Comms plan for all announcements – **Robb & Heather / GCPE HQ**

From: [Plan, Jakelene GCPE:EX](#)
To: [Ryckman, Scott GCPE:EX](#)
Cc: [Youngs, Kirsten R GCPE:EX](#); [Robb, Katie GCPE:EX](#)
Subject: AML event - walkthrough/powerpoint (1 of 2)
Date: May 8, 2019 4:50:36 PM
Attachments: [Dirty Money - Part 2 MH v2.pptx](#)

Hi Scott,

As discussed, please see attached for one of the final powerpoints for tonights walkthrough. The other powerpoint has not been finalized and will be sent as soon as we wrap that up.

Thanks!

Jakelene Plan

Public Affairs Officer, Ministry of Finance
Government Communications & Public Engagement
C: (250) 886-3157 | E: jakelene.plan@gov.bc.ca

Plan, Jakelene GCPE:EX

From: Plan, Jakelene GCPE:EX
Sent: May 8, 2019 4:56 PM
To: Ryckman, Scott GCPE:EX
Cc: Youngs, Kirsten R GCPE:EX; Robb, Katie GCPE:EX
Subject: RE: AML event - walkthrough/powerpoint (1 of 2)

Doable, we can make sure they're combined for you ahead of the event tomorrow morning.

From: Ryckman, Scott GCPE:EX
Sent: May 8, 2019 4:53 PM
To: Plan, Jakelene GCPE:EX <Jakelene.Plan@gov.bc.ca>
Cc: Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>; Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>
Subject: RE: AML event - walkthrough/powerpoint (1 of 2)

We do not have the ability to switch files during an event – please combine them into one with file

From: Plan, Jakelene GCPE:EX
Sent: Wednesday, May 8, 2019 4:51 PM
To: Ryckman, Scott GCPE:EX
Cc: Youngs, Kirsten R GCPE:EX; Robb, Katie GCPE:EX
Subject: AML event - walkthrough/powerpoint (1 of 2)

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Jakelene Plan

Public Affairs Officer, Ministry of Finance
Government Communications & Public Engagement
C: (250) 886-3157 | E: jakelene.plan@gov.bc.ca

DIRTY MONEY — PART 2

An Independent Review for the Attorney General of B.C.

Peter German & Assocs. Inc.

TRANSNATIONAL MONEY LAUNDERING

- Transnational organized crime benefits from the unique environment of British Columbia.
- It has leveraged gaps in the Canadian criminal justice system.
- In BC, alliances have been seen between Mainland Chinese, Iranian and Mexican OC, and domestic outlaw bikers and other gangs.
- Illicit money flows into Vancouver from China, Iran, Mexico and other countries, coalescing with the proceeds of domestic drug trafficking and other crimes.

PRIVATE MORTGAGE LENDERS

- Private mortgage lenders are a growing segment of the market and vulnerable to money laundering.
- They are not reporting entities to FinTRAC and there is little visibility of their beneficial owners, source of funds or lending practices.
- Currently 90,000, or 9% of residential mortgages, are held by 18,570 private lenders, with 80% of the lenders being corporate entities.
- Although foreign banks are not permitted to engage in mortgage lending, unregulated lenders from outside Canada can register mortgages against BC property.

NOMINEES

- The use of nominees, or straw buyers, in real estate transactions is commonplace and is exploited by beneficial owners, including criminals engaged in money laundering.
- 3% of B.C. titles (33,292 in 20 years) are held by persons whose occupation is listed as student, homemaker, or unemployed
- Approximately 25% had clear title. These tend to be expensive houses, with 88 houses over \$10 million.

OVERSEAS OWNERS

- 13,678 residential properties, with an aggregate value of \$16.12 billion, are owned by individuals or entities with service addresses outside Canada, a fifth of which are in high-risk jurisdictions for money laundering.
- A total of 25 properties with an aggregate value of \$34.5 million have owners with addresses in countries subject to trade sanctions.
- 20 properties registered in the British Virgin Islands are owned by shell companies, with full anonymity of directors and beneficial owners.
- Opaque service addresses, including post office boxes (71,000) and lawyer offices (2,000), are common as there is no requirement in BC for owners to list their principal or work address, as a service address

THE RISK IN REAL ESTATE

- The combination of opaque ownership structures and all-cash purchases increases the ML risk considerably, particularly when a nominee or offshore buyer is involved.
- Purchases of residences without financing account for 29%-38% of purchases by companies, 58% of purchases by registered trusts, 20%-28% of purchases by nominees, and 32%-40% by offshore buyers.

REGULATORY GAPS

- Reporting of suspicious transactions to FinTRAC, by realtors has been dismal for years.
- The use of Geographic Targeting Orders in the U.S. has assisted greatly with ensuring greater transparency in real estate developments and purchases.
- The absence of standardized data fields and prompts make LTSA data difficult to use for analytical purposes. It currently includes properties registered to “superdad”, ‘funemployed’, ‘wannabe ski bum’, ‘domestic diva’, ‘trophy wife’, and ‘launderer’.

MISUSE OF LEGAL CHARGES

- Private mortgages can be used as a debt enforcement tool by organized crime, seeking to leverage the legal system for its own purposes.
- Builders liens are particularly vulnerable because a creditor can register a lien without the consent of the titleholder.

LAWYERS AND ML

- Lawyers are the 'black hole' of real estate and of money movement generally.
- With no visibility by law enforcement on what enters and leaves a lawyer's trust account, many investigations are stymied.
- Lawyers acting in real estate transactions are particularly vulnerable to being used as conduits for dirty money and must enquire into the source of funds when closing funds are wired into their trust accounts from foreign destinations.

LAWYERS

- Exempted by SCC *Federation* decision from reporting to FinTRAC
- Canada criticized by FATF and others
- SCC did not close the door on reporting
- Waiting for Ottawa to develop a remedy
- Workarounds / blinds used in other common law countries
- Reporting of basic financial information imperative
- Lawyers as realtors
- Lawyers vs. Notaries (who do report)

OTHER VULNERABLE SECTORS IDENTIFIED

- Watercraft
- Auction Houses
- Fisheries Quotas
- Public and Private Colleges
- Cryptocurrency
- Foreign Credit Cards

A HOLISTIC SOLUTION

- Universal cash reporting over a certain threshold avoids the need to constantly reassess sectors and effectively prevents OC and the underground economy from seeking the unregulated path of least resistance.
- As a supplement to universal cash reporting, Geographic Tracking Orders allow authorities to target a certain sector, in a specific geographic area, such as Greater Vancouver.

FINANCIAL COMPLIANCE

- The federal government has created an AML bureaucracy which is focused on compliance. It has not infused equivalent resources into enforcement and prosecution.
- FinTRAC is an outlier among international FIUs because it is not a law enforcement agency and does not permit police to work in its offices, due to privacy concerns.
- Many reporting entities are critical of FinTRAC due to the absence of tangible results for the hundreds of thousands of reports it houses.
- Unless its intel is readily available to law enforcement and security agencies, FinTRAC becomes simply a collector of information.

From: [Finn, Heather GCPE:EX](#)
To: [Smith, George PREM:EX](#); [Harder, Derrick AG:EX](#); [Duffus, Robert GCPE:EX](#); [Devereux, Rick GCPE:EX](#); [Lawson, Liam FIN:EX](#); [Zadavec, Don GCPE:EX](#); [Harris, Megan AG:EX](#)
Cc: [Robb, Katie GCPE:EX](#)
Subject: complan
Date: May 6, 2019 10:13:51 AM
Attachments: [AML-Complan-RGG-V2.docx](#)

See attached.

Heather Finn
778-679-2104

Page 020 of 474

Withheld pursuant to/removed as

s.17; s.12; s.13

Page 021 of 474 to/à Page 023 of 474

Withheld pursuant to/removed as

s.12; s.13; s.17

From: [Robb, Katie GCPE:EX](#)
To: [Youngs, Kirsten R GCPE:EX](#); [Plan, Jakelene GCPE:EX](#)
Subject: FW: AML complan
Date: May 6, 2019 9:27:53 AM
Attachments: AML-Complan-RGG-V2.docx

FYI

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Gibbs, Robb GCPE:EX
Sent: Monday, May 6, 2019 9:15 AM
To: Robb, Katie GCPE:EX
Subject: AML complan

Hi Katie,

Attached is the complan I worked up on Saturday ^{s.13;s.17}
s.13;s.17

Tks,
R

From: [Robb, Katie GCPE:EX](#)
To: [Youngs, Kirsten R GCPE:EX](#); [Plan, Jakelene GCPE:EX](#)
Subject: FW: AML Critical Path
Date: May 7, 2019 1:39:56 PM
Attachments: 20190507 AML Critical Path.xlsx

And this.

What is the status of the hard copy reports anyway?

Katie Robb

Communications Director | Ministry of Finance

Government Communications & Public Engagement

O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Finn, Heather GCPE:EX

Sent: Tuesday, May 7, 2019 1:05 PM

To: Gibbs, Robb GCPE:EX; Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Duffus, Robert GCPE:EX; Robb, Katie GCPE:EX; Smith, Jimmy GCPE:EX; Marriott, Sarah GCPE:EX; Hardin, Karl GCPE:EX; Aaron, Sage PREM:EX; Smith, George PREM:EX

Subject: AML Critical Path

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

AML - Critical Path

Task	Drafter	Responsible	Drafter Deadline	To PO for Review	Finish	Comments	Status
AML Comms Plan	Finn	Gibbs		4-May-19	6-May-19		Complete
AML Message Guide		Finn/Danielle	07-May	8-May-19	8-May-19		
May 9 - EVENT		Rick			9-May-19		
May 9 - Media Advisory	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Key Messages	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Links to reports for NR		FIN COMMS			9-May-19		
May 9 - Hard copies of German report		AG COMMS			9-May-19		
May 9 - Hard copies of Maloney report		FIN COMMS			9-May-19		
May 9 - News Release	FIN COMMS	Finn	07-May		8-May-19		
May 9 - QA	FIN COMMS	Jimmy	07-May		8-May-19		
May 9- MDE Speaking Notes	AG COMMS	Finn	07-May		8-May-19		
May 9 - MCJ Speaking Notes	FIN COMMS	Katie/Finn	07-May		8-May-19		

Plan, Jakelene GCPE:EX

From: Korinowsky, Alexandra GCPE:EX
Sent: May 7, 2019 1:48 PM
To: Plan, Jakelene GCPE:EX; Robb, Katie GCPE:EX; Youngs, Kirsten R GCPE:EX
Subject: RE: AML Critical Path

The status is the reports will be delivered Wednesday by end of day to both Victoria and Vancouver. 55 copies to Victoria, 20 copies to Vancouver.

I'm waiting on the delivery info for Vancouver as per the other email thread going.

AK

From: Plan, Jakelene GCPE:EX
Sent: May 7, 2019 1:41 PM
To: Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>; Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>
Cc: Korinowsky, Alexandra GCPE:EX <Alexandra.Korinowsky@gov.bc.ca>
Subject: RE: AML Critical Path

Looping in Alex on that question.

From: Robb, Katie GCPE:EX
Sent: May 7, 2019 1:40 PM
To: Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>; Plan, Jakelene GCPE:EX <Jakelene.Plan@gov.bc.ca>
Subject: FW: AML Critical Path

And this.

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Communications Director | Ministry of Finance
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From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX; Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Duffus, Robert GCPE:EX; Robb, Katie GCPE:EX; Smith, Jimmy GCPE:EX; Marriott, Sarah GCPE:EX; Hardin, Karl GCPE:EX; Aaron, Sage PREM:EX; Smith, George PREM:EX
Subject: AML Critical Path

Heather Finn

Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

From: [Robb, Katie GCPE:EX](#)
To: [Peters, Melissa GCPE:EX](#); [Plan, Jakelene GCPE:EX](#); [Youngs, Kirsten R GCPE:EX](#)
Subject: FW: Copy of German2
Date: May 6, 2019 9:10:48 PM
Attachments: [Vancouver at Risk With Executive Summary - v. 5 - Min of Finance.pdf](#)

Exceptionally confidential – let's discuss tomorrow. We should dig into the real estate section.

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Wanamaker, Lori FIN:EX
Sent: Monday, May 6, 2019 6:34 PM
To: Robb, Katie GCPE:EX
Subject: Fw: Copy of German2

Fyi

Sent from my BlackBerry — the most secure mobile device — via the TELUS Network

From: Lori.Wanamaker@gov.bc.ca
Sent: May 6, 2019 1:15 PM
To: Christina.Dawkins@gov.bc.ca
Cc: Paul.Flanagan@gov.bc.ca
Subject: FW: Copy of German2

FYI

From: Scott, Douglas S AG:EX
Sent: May 3, 2019 4:58 PM
To: Wanamaker, Lori FIN:EX <Lori.Wanamaker@gov.bc.ca>
Subject: Copy of German2

Hi Lori,

Attached please find a copy of Peter German's report. I have confirmation from our MO that this can be shared with Maureen Maloney's team as appropriate.

Best,

Doug

Douglas S. Scott

Associate Deputy Minister
Ministry of Attorney General
Government of British Columbia

Page 030 of 474 to/à Page 349 of 474

Withheld pursuant to/removed as

s.13

Plan, Jakelene GCPE:EX

From: Plan, Jakelene GCPE:EX
Sent: May 30, 2019 10:46 AM
To: Robb, Katie GCPE:EX
Cc: Youngs, Kirsten R GCPE:EX
Subject: RE: aml
Attachments: AML-FIN Complan 2019 - May 28 DRAFT.docx

Thanks, I appreciate it. 😊

Attached is a draft (not approved, not seen by program) of an AML comms plan that may be useful — I borrowed heavily from the AG version sent over to us last week, since reinventing the wheel doesn't make sense. It's saved in Divisions under Policy and Legislation, if you need it (or not!)

From: Robb, Katie GCPE:EX
Sent: May 30, 2019 10:40 AM
To: Plan, Jakelene GCPE:EX <Jakelene.Plan@gov.bc.ca>
Cc: Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>
Subject: FW: aml

Jake, FYI – s.22
s.22

Katie Robb
Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Lawson, Liam FIN:EX
Sent: Thursday, May 30, 2019 8:57 AM
To: Robb, Katie GCPE:EX
Subject: aml

Could you work with AG's comms shop on a draft release for when potential summit is public with quotes from MCJ and MDE

Draft idea for us:

15 of the 29 recommendations in the report from the expert panel on money laundering involve working with our provincial and federal counterparts. This summit will be a vital step in ending money laundering not only in British Columbia but across our country.

Liam Lawson
Senior Ministerial Assistant
Minister of Finance and Deputy Premier
P: 778-974-6050 | C: 250-812-2547

Page 351 of 474 to/à Page 357 of 474

Withheld pursuant to/removed as

s.13; s.17

From: [Finn, Heather GCPE:EX](#)
To: [Aaron, Sage PREM:EX](#); [Holmwood, Jen PREM:EX](#); [Smith, George PREM:EX](#); [Gibbs, Robb GCPE:EX](#)
Cc: [Dalzell, Danielle GCPE:EX](#); [Devereux, Rick GCPE:EX](#); [Poorooshab, Nammi GCPE:EX](#); [Marriott, Sarah GCPE:EX](#); [Smith, Jimmy GCPE:EX](#)
Subject: AML Com plan
Date: May 9, 2019 3:00:37 PM
Attachments: [20190509 AML-Complan-updated.docx](#)

Hi all,

Since Premier isn't doing his weekly scrum today and the Ministers' response on this was more vague (currently before cabinet, answer soon) do we need to find a way to fulfill part three of the roll out in the attached plan?

Please advise.

Thanks!

Heather Finn

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

Marriott, Sarah GCPE:EX

From: Lawson, Liam FIN:EX
Sent: May 2, 2019 3:24 PM
To: Marriott, Sarah GCPE:EX
Subject: RE: To-do list (to send to comms shops ASAP)

Thanks for this Sarah, good with us and our CD
L

From: Marriott, Sarah GCPE:EX
Sent: May 2, 2019 3:01 PM
To: Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>; Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>; Harder, Derrick AG:EX <Derrick.Harder@gov.bc.ca>; Smith, Jessica C AG:EX <Jessica.C.Smith@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
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Sarah Marriott
Issues Manager
250.361.8416

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Comms plan for all announcements – **Robb & Heather / GCPE HQ**

Marriott, Sarah GCPE:EX

From: Smith, George PREM:EX
Sent: May 3, 2019 8:02 AM
To: Smith, Jimmy GCPE:EX; Marriott, Sarah GCPE:EX
Cc: Howlett, Tim GCPE:EX
Subject: Fwd: AML rollout

Great work, Jimmy and Sarah!

Begin forwarded message:

From: "Meggs, Geoff PREM:EX" <Geoff.Meggs@gov.bc.ca>
Date: May 3, 2019 at 7:50:27 AM PDT
To: "Eby, David AG:EX" <David.Eby@gov.bc.ca>, "James, Carole FIN:EX" <Carole.James@gov.bc.ca>
Cc: "Wright, Don J. PREM:EX" <Don.J.Wright@gov.bc.ca>, "Wanamaker, Lori FIN:EX" <Lori.Wanamaker@gov.bc.ca>, "Fyfe, Richard J AG:EX" <Richard.Fyfe@gov.bc.ca>, "Harder, Derrick AG:EX" <Derrick.Harder@gov.bc.ca>, "Spilker, Robyn FIN:EX" <Robyn.Spilker@gov.bc.ca>, "Lawson, Liam FIN:EX" <Liam.Lawson@gov.bc.ca>, "Howlett, Tim GCPE:EX" <Tim.Howlett@gov.bc.ca>, "Aaron, Sage PREM:EX" <Sage.Aaron@gov.bc.ca>, "Smith, George PREM:EX" <George.Smith@gov.bc.ca>
Subject: AML rollout

Good afternoon,

Good morning,

In response to a number of inquiries and after consultation with Don Wright, I'd like to confirm the following arrangements for next steps in the anti-money laundering file:

Timeline

May 7 – release of German chapters on luxury cars and horse racing (Minister Eby)§.12;s.13
s.12;s.13

Thanks for your assistance

Geoff

GEOFF MEGGS

Chief of Staff, Premier's Office
West Annex, Parliament Buildings
Victoria, BC, V8V 1K7
250 387-1715

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Withheld pursuant to/removed as

s.12; s.13; s.17

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Withheld pursuant to/removed as

s.13; s.17

AML - Critical Path

Task	Drafter	Responsible	Drafter Deadline	To PO/MO for Review	Finish	Comments	Status
AML Comms Plan	Finn	Gibbs		4-May-19	6-May-19		
AML Message Guide		Finn/Danielle	07-May	7-May-19	8-May-19		
May 7 - EVENT		Rick			7-May-19		
May 7 - Media Advisory	AG COMMS	Finn			6-May-19		
May 7 - Key Messages	AG COMMS	Finn			6-May-19		
May 7 - News Release	AG COMMS	Finn			6-May-19		
May 7 - QA	Sarah	Sarah			6-May-19		
May 7 - MDE Speaking Notes	AG COMMS	Finn			6-May-19	Opening Remarks + KMs	
May 7 - Review German Speaking Notes		Sarah			6-May-19		
May 7 - Post announcement Media for MDE		AG COMMS					
May 7 - MLA Kit							
May 7 - Digital/Social Media	AG COMMS	Karl					
May 9 - EVENT		Rick			9-May-19		
May 9 - Media Advisory	FIN COMMS	Finn	06-May		8-May-19		
May 9 - Key Messages		Finn			8-May-19		
May 9 - News Release	FIN COMMS	Finn	06-May		8-May-19		
May 9 - QA	FIN COMMS	Jimmy	06-May		8-May-19		
May 9- MDE Speaking Notes	AG COMMS	Finn	07-May		8-May-19		
May 9 - MCJ Speaking Notes	FIN COMMS	Katie	07-May		8-May-19		
May 9 - Maloney Report Backgrounder	FIN COMMS, Jimmy, Finance MO	Finn			8-May-19		
May 9 - German Report Backgrounder	AG MO	Finn			8-May-19		
May 9 - ReviewGerman Speaking Notes		Sarah			8-May-19		
May 9 - Review Maloney Speaking Notes		Jimmy					
May 9 - MLA Kit							
May 9 - Post announcement Media MCJ MDE		FIN COMMS					
May 9 - Digital		Karl					
May 15 - EVENT		Rick					
May 15 - Media Advisory	AG COMMS	Finn	09-May	10-May-19			
May 15 - Option A News Release	AG COMMS	Finn	09-May	10-May-19	13-May-19		
May 15 - Option B News Release	AG COMMS	Finn	09-May	10-May-19	13-May-19		
May 15 - QA		ISSUES	09-May	10-May-19	13-May-19		
May 15 - Option A PJH Speaking Notes		Danielle		10-May-19	13-May-19		
May 15 - Option B PJH Speaking Notes		Danielle		10-May-19			
May 15 - MLA Kit							
May 15 - Post Announcement Media MCJ MDE		FIN COMMS					
May 15 - Op-Ed		Danielle					
May 15 - Digital	AG & FIN COMMS	Karl					

Marriott, Sarah GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 5, 2019 9:53 PM
To: Gibbs, Robb GCPE:EX; Marriott, Sarah GCPE:EX; Smith, Jimmy GCPE:EX; Smith, George
PREM:EX
Subject: Draft Critical Path
Attachments: 20190505 AML Critical Path.xlsx

Not finished filling in the dates, but wondering if I'm missing any key tasks.

Thanks,

Finn

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

AML - Critical Path

Task	Drafter	Responsible	Drafter Deadline	To PO for Review	Finish	Comments	Status
AML Comms Plan	Finn	Gibbs		4-May-19	6-May-19		Complete
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May 9 - Media Advisory	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Key Messages	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Links to reports for NR		FIN COMMS			9-May-19		
May 9 - Hard copies of German report		AG COMMS			9-May-19		
May 9 - Hard copies of Maloney report		FIN COMMS			9-May-19		
May 9 - News Release	FIN COMMS	Finn	07-May		8-May-19		
May 9 - QA	FIN COMMS	Jimmy	07-May		8-May-19		
May 9- MDE Speaking Notes	AG COMMS	Finn	07-May		8-May-19		
May 9 - MCJ Speaking Notes	FIN COMMS	Katie/Finn	07-May		8-May-19		
May 9 - Maloney Report Backgrounder/Deck	From Maloney - Katie Robb is FIN contact	Finn	08-May		8-May-19		
May 9 - German Report Backgrounder/Deck	From German; Megan Harris is AG contact	Finn	08-May		8-May-19		
May 9 - ReviewGerman Speaking Notes	From German; Megan Harris is AG contact	Sarah	08-May		8-May-19		
May 9 - Review Maloney Speaking Notes	From Maloney - Katie Robb is FIN contact	Jimmy	08-May				
May 9 - Post announcement Media MCJ MDE		FIN COMMS					
May 15 - EVENT		Rick			15-May-19		
May 15 - Media Advisory	AG COMMS	Finn	09-May	10-May-19	13-May-19		
May 15 - Option A News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Draft to Danielle by Noon please	
May 15 - Option B News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS:Draft to Danielle by Noon please	
May 15 - QA		ISSUES	09-May	10-May-19	13-May-19		
May 15 - Option A PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this	
May 15 - Option B PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this	
May 15 - Post Announcement Media MCJ MDE		FIN COMMS					
May 15 - Op-Ed		Danielle					
May 15 - Digital	AG & FIN COMMS	Karl					

Marriott, Sarah GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX; Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Duffus, Robert GCPE:EX; Robb, Katie GCPE:EX; Smith, Jimmy GCPE:EX; Marriott, Sarah GCPE:EX; Hardin, Karl GCPE:EX; Aaron, Sage PREM:EX; Smith, George PREM:EX
Subject: AML Critical Path
Attachments: 20190507 AML Critical Path.xlsx

Heather Finn

Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

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s.12; s.13; s.17

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Withheld pursuant to/removed as

s.13; s.17; s.12

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Withheld pursuant to/removed as

s.12; s.13; s.17

Marriott, Sarah GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 9, 2019 3:01 PM
To: Aaron, Sage PREM:EX; Holmwood, Jen PREM:EX; Smith, George PREM:EX; Gibbs, Robb GCPE:EX
Cc: Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Poorooshab, Nammi GCPE:EX; Marriott, Sarah GCPE:EX; Smith, Jimmy GCPE:EX
Subject: AML Com plan
Attachments: 20190509 AML-Complan-updated.docx

Hi all,

Since Premier isn't doing his weekly scrum today and the Ministers' response on this was more vague (currently before cabinet, answer soon) do we need to find a way to fulfill part three of the roll out in the attached plan?

Please advise.

Thanks!

Heather Finn

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

Marriott, Sarah GCPE:EX

From: Aaron, Sage PREM:EX
Sent: May 9, 2019 3:44 PM
To: Finn, Heather GCPE:EX; Holmwood, Jen PREM:EX; Smith, George PREM:EX; Gibbs, Robb GCPE:EX
Cc: Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Poorooshasb, Nammi GCPE:EX; Marriott, Sarah GCPE:EX; Smith, Jimmy GCPE:EX
Subject: RE: AML Com plan

George!

From: Finn, Heather GCPE:EX
Sent: May 9, 2019 3:35 PM
To: Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: RE: AML Com plan

Great! Who is on this?

Heather Finn
778-679-2104

From: Aaron, Sage PREM:EX
Sent: May 9, 2019 3:19 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: RE: AML Com plan

I believe Rob Shaw has a request in for AGDE (& maybe MCJ) for his Monday column that could fill that need quite nicely.

From: Finn, Heather GCPE:EX
Sent: May 9, 2019 3:01 PM
To: Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: AML Com plan

Hi all,

Since Premier isn't doing his weekly scrum today and the Ministers' response on this was more vague (currently before cabinet, answer soon) do we need to find a way to fulfill part three of the roll out in the attached plan?

Please advise.

Thanks!

Heather Finn

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

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Withheld pursuant to/removed as

s.12; s.13; s.17

AML - Critical Path

Task	Drafter	Responsible	Drafter Deadline	To PO for Review	Finish	Comments	Status
AML Comms Plan	Finn	Gibbs		4-May-19	6-May-19		Complete
AML Message Guide		Finn/Danielle	07-May	8-May-19	8-May-19		
May 9 - EVENT		Rick			9-May-19		
May 9 - Media Advisory	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Key Messages	FIN COMMS	Finn	07-May		8-May-19		
May 9 - Links to reports for NR		FIN COMMS			9-May-19		
May 9 - Hard copies of German report		AG COMMS			9-May-19		
May 9 - Hard copies of Maloney report		FIN COMMS			9-May-19		
May 9 - News Release	FIN COMMS	Finn	07-May		8-May-19		
May 9 - QA	FIN COMMS	Jimmy	07-May		8-May-19		
May 9- MDE Speaking Notes	AG COMMS	Finn	07-May		8-May-19		
May 9 - MCJ Speaking Notes	FIN COMMS	Katie/Finn	07-May		8-May-19		
May 9 - Maloney Report Backgrounder/Deck	From Maloney - Katie Robb is FIN contact	Finn	08-May		8-May-19		
May 9 - German Report Backgrounder/Deck	From German; Megan Harris is AG contact	Finn	08-May		8-May-19		
May 9 - ReviewGerman Speaking Notes	From German; Megan Harris is AG contact	Sarah	08-May		8-May-19		
May 9 - Review Maloney Speaking Notes	From Maloney - Katie Robb is FIN contact	Jimmy	08-May				
May 9 - Post announcement Media MCJ MDE		FIN COMMS					
May 15 - EVENT		Rick			15-May-19		
May 15 - Media Advisory	AG COMMS	Finn	09-May	10-May-19	13-May-19		
May 15 - Option A News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Draft to Danielle by Noon please	
May 15 - Option B News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS:Draft to Danielle by Noon please	
May 15 - QA		ISSUES	09-May	10-May-19	13-May-19		
May 15 - Option A PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this	
May 15 - Option B PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this	
May 15 - Post Announcement Media MCJ MDE		FIN COMMS					
May 15 - Op-Ed		Danielle					
May 15 - Digital	AG & FIN COMMS	Karl					

Howlett, Tim GCPE:EX

From: Marriott, Sarah GCPE:EX
Sent: Friday, May 10, 2019 10:50 AM
To: Howlett, Tim GCPE:EX
Subject: FW: AML Critical Path
Attachments: 20190507 AML Critical Path.xlsx

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn

Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

From: [Finn, Heather GCPE:EX](#)
To: [Gibbs, Robb GCPE:EX](#); [Dalzell, Danielle GCPE:EX](#); [Devereux, Rick GCPE:EX](#); [Duffus, Robert GCPE:EX](#); [Robb, Katie GCPE:EX](#); [Smith, Jimmy GCPE:EX](#); [Marriott, Sarah GCPE:EX](#); [Hardin, Karl GCPE:EX](#); [Aaron, Sage PREM:EX](#); [Smith, George PREM:EX](#); [Harris, Megan AG:EX](#)
Cc: [Lawson, Liam FIN:EX](#); [Spilker, Robyn FIN:EX](#); [Harder, Derrick AG:EX](#); [Smith, Jessica C AG:EX](#)
Subject: RE: AML Critical Path
Date: May 7, 2019 1:37:08 PM

Hi folks,

I just want to clarify that by “responsible” I mean the person tasked with getting the product across the finish line and ensuring that everyone one who needs to provide feed back (MOs, Issues, etc) has been looped in.

Thanks

HF

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: [Gibbs, Robb GCPE:EX](#) ([Robb.Gibbs@gov.bc.ca](#)) <[Robb.Gibbs@gov.bc.ca](#)>; [Dalzell, Danielle GCPE:EX](#) <[Danielle.Dalzell@gov.bc.ca](#)>; [Devereux, Rick GCPE:EX](#) <[Rick.Devereux@gov.bc.ca](#)>; [Duffus, Robert GCPE:EX](#) <[Robert.Duffus@gov.bc.ca](#)>; [Katie GCPE:EX Robb](#) ([Katie.Robb@gov.bc.ca](#)) <[Katie.Robb@gov.bc.ca](#)>; [Smith, Jimmy GCPE:EX](#) <[Jimmy.Smith@gov.bc.ca](#)>; [Marriott, Sarah GCPE:EX](#) <[Sarah.Marriott@gov.bc.ca](#)>; [Hardin, Karl GCPE:EX](#) <[Karl.Hardin@gov.bc.ca](#)>; [Aaron, Sage PREM:EX](#) <[Sage.Aaron@gov.bc.ca](#)>; [Smith, George PREM:EX](#) <[George.Smith@gov.bc.ca](#)>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
[Heather.Finn@gov.bc.ca](#)
778-679-2104

From: [Youngs, Kirsten R GCPE:EX](#)
To: [Smith, Jimmy GCPE:EX](#)
Subject: RE: Directive from PO on AML releases
Date: April 15, 2019 1:51:19 PM

In that spirit, Finance compiled these ADM-approved bullets for MCJ's Fairchild interview this afternoon (it's SVT-focused, but Eric also mentioned he may ask generally about AML) MO has these, but mentioned IM may also be working on info.

- I applaud the real estate organizations for coming together to help fight money laundering in B.C.
- I agree that fighting this problem will take coordination and collaboration from all involved, and I'm pleased to see them stepping up.
- These organizations have offered some practical and valuable actions to help guard against criminals abusing the real estate sector.
- Their recommendations support our government's work to fight money laundering, including:
 - Convening an expert panel on money laundering in real estate to identify systemic risks;
 - Introducing the *Land Owner Transparency Act* (LOTA) to require existing property owners to disclose current beneficial ownership; and
 - Working with our partners to amend corporate legislation to require the collection of beneficial ownership information.
- Their recommendations also align with recent actions by the Real Estate Council of BC and FINTRAC to share information to facilitate anti-money laundering enforcement activities in B.C.

Cheers, and thanks Jimmy

From: Smith, Jimmy GCPE:EX
Sent: April 15, 2019 1:43 PM
To: Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>; Henry, Molly FIN:EX <Molly.Henry@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>; Spilker, Robyn FIN:EX <Robyn.Spilker@gov.bc.ca>
Subject: RE: Directive from PO on AML releases

Hey Kirsten!

We're moving forward. The best way to make sure nothing is missed in the future is we ensure the text is reviewed by Issues before release. The Finance team has been good about this and thanks for your continued support.

James Smith
Issues Manager
GCPE
250.882.2892

From: Youngs, Kirsten R GCPE:EX

Sent: April 15, 2019 1:27 PM

To: Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Henry, Molly FIN:EX <Molly.Henry@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>; Spilker, Robyn FIN:EX <Robyn.Spilker@gov.bc.ca>

Subject: RE: Directive from PO on AML releases

Roger that, thanks James.

I understood that IM and Don Z were cc'd by AG on the statement that went out today. Apologies if that was incorrect.

Will ensure to loop in with you at the early stages going forward.

From: Smith, Jimmy GCPE:EX

Sent: April 15, 2019 1:23 PM

To: Henry, Molly FIN:EX <Molly.Henry@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca>; Spilker, Robyn FIN:EX <Robyn.Spilker@gov.bc.ca>; Youngs, Kirsten R GCPE:EX <Kirsten.Youngs@gov.bc.ca>

Subject: Directive from PO on AML releases

Hello Team Finance,

I'm passing on a directive we've received from PO. It concerns all media releases relating broadly to money laundering and that in every future case, they be vetted through the Issues Team before public release. This directive applies to Finance and AG.

Thanks for your continued hard work on this.

Cheers!

James Smith
Issues Manager
GCPE
250.882.2892

D'Argis, Krista GCPE:EX

From: Zadravec, Don GCPE:EX
Sent: Monday, June 17, 2019 10:25 AM
To: Finn, Heather GCPE:EX
Subject: FW: DRAFT Materials Money Laundering
Attachments: AEST - Communications Pitch - Money Laundering.docx; Critical Path PSI Money Laundering.docx; IB_Money Laundering_Dr1June 14.docx; QA_AEST_Money Laundering_June 25.docx

Can we discuss?

From: Heiman, Carolyn GCPE:EX
Sent: Monday, June 17, 2019 9:04 AM
To: Zadravec, Don GCPE:EX
Cc: LeGuilloux, Marg GCPE:EX
Subject: DRAFT Materials Money Laundering

Don
FYI – and of course for your comments and direction – is the draft package of materials related to the June 30 deadline for public and private post secondary institutions to review and provide their financial policies as they related to taking large cash payments and money laundering.

MO has received the critical path document and now are asking for a pitch. Draft provided here along with draft KM, etc. This package now with ADM for review but verbally I'm getting signals that the ministry, including DM, is comfortable with this approach.

If you're not already aware, s.22
s.22 That means Jennifer the manager here will have to carry this across the line. Hence I'm wanting this well in hand before I leave.

Carolyn

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Withheld pursuant to/removed as

s.13; s.17

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Withheld pursuant to/removed as

s.13

Questions & Answers

Money laundering in B.C.'s post-secondary sector

Ministry of Advanced Education, Skills and Training
June 2019

1. Did all public and private institutions meet the June 30th deadline to provide the ministry with information about their policies related to money laundering?

- Xyxyxyxyx
- Xyyxyxy
-

2. What action will the ministry take on those who didn't meet the deadline?

- Xyxyxyxyx
- Xyyxyxy

3. What did you discover about the state of policies among institutions in BC?

- It's too early to make any observations about the information received?
- Ministry staff will use the next few months to evaluate the data gathered and then determine what, if any, actions are required.

4. What vulnerabilities are there now with the existing policies?

- In the interest of security, we will not be providing details on individual practices.
- We will respect the confidentiality of each institution's financial policy.
- My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.

5. What will you do if you find any vulnerabilities at an institution?

- In the interest of security, we will not be providing details on individual practices.
 - We will respect the confidentiality of each institution's financial policy.
 - My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.
-

- If there are any potential vulnerabilities, we will be expecting those institutions to take corrective action to ensure their financial policies are not a potential target for money laundering.

-

6. Will you report out on the results from your letter? Will you disclose what policies are currently in place and what changes you require?

- We will respect the confidentiality of each institution's financial policy.
- My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.
- If there are any potential vulnerabilities, we will be expecting those institutions to take corrective action to ensure their financial policies are not a potential target for money laundering.

7. Why did you write to all the public and private post-secondary institutions?

- Dirty money is making life more expensive and hurting all of us in B.C.
- We're doing our part to detect, deter and prevent the ability to launder money in B.C.'s post-secondary system.
- The second German report highlighted public and private post-secondary institutions as one of several vulnerable sectors for money laundering.
- We must raise awareness and take action to detect, deter and prevent the ability to launder money throughout the post-secondary system.
- B.C.'s post-secondary institutions have an excellent reputation.
- While the German report did not focus on the education sector, it is our collective responsibility to ensure that we address any vulnerabilities that may exist.

8. What did you ask post-secondary sector to do in the letter?

- I've asked all post-secondary institutions to examine their current practices including refund policies and take steps to eliminating opportunities for money laundering.
- I've asked each institution for a copy of the policies on accepting cash, providing refunds and what steps they're taking to deter money laundering.

9. Are public or private institutions laundering money?

- It's important to note that these are allegations.
- Several sectors in B.C. were identified as being vulnerable to money laundering including public and private post-secondary institutions.

- Other vulnerable sectors: watercraft, auction houses, fisheries quotas cryptocurrency and foreign credit cards.
- There's no suggestion that institutions knowingly accepted proceeds of crime.

10. How do you define "large cash payments"?

- Payments in the thousands of dollars.

11. Why not ban large cash payments altogether?

- It is important to balance the need for institutions to accept some cash payments from students, while not becoming a target for money laundering

12. Why not ban cash payments for tuition from international students?

- It would not be fair or realistic to single out just one group of students.

13. Are you prepared to ban cash payments entirely if it appears there are serious vulnerabilities?

- It is premature to draw conclusions at this time.
- It's also important to balance the need for institutions to accept some cash payments from students, while not becoming a target for money laundering

14. Are post-secondary institutions in B.C. required to report large cash payments to FinTrac?

- Only financial institutions and designated businesses such as money service businesses or securities firms are required to report under FinTrac for large cash deposits.

15. The examples in the German report were under \$10,000, which is the FINTRAC reporting threshold. What threshold for "large cash" payments do you have in mind? Isn't your letter an over-reaction?

- Public and private post-secondary institutions are responsible for managing their activities, including collecting student tuition and other fees.
- The day-to-day handling of money is carried out by the individual institution.
- I have asked post-secondary institutions to review their policies following the German report.
- I can't stress enough that it is our collective responsibility to ensure that we address any vulnerabilities that may exist.

16. What are the current policies around accepting cash payments?

- There's no single policy.
- Public and private post-secondary institutions are responsible for managing their activities, including collecting student tuition and other fees.
- The day-to-day handling of money is carried out by the individual institution.
- Nevertheless, I have asked all post-secondary institutions to review their policies following the German report.

17. How many post-secondary institutions are there?

- 25 public and about 350 private post-secondary institutions.

18. When did you first become aware of the allegations?

- The same time as the rest of my cabinet colleagues.

19. Are you going to investigate the extent of money laundering in the post-secondary sector to get a full picture?

- Gov't accepted the recommendations and findings of the report.
- In response, Premier Horgan announced a public inquiry.

20. Will post-secondary institutions be included in the public inquiry?

- That's not up to me as minister.
- A public inquiry into money laundering was announced on May 15 by Premier John Horgan.
- B.C. Supreme Court Justice Austin Cullen will head the inquiry. He's been given the power to compel witnesses and order documents to be disclosed.

18. There are suggestions some casinos turned a blind eye to money-laundering – do you think that's a problem in the post-secondary sector?

- Several sectors in B.C. were identified as being potentially vulnerable to money laundering, including public and private post-secondary institutions.
- It's important to note that these are allegations.
- There's no suggestion that institutions acted inappropriately or knowingly accepted proceeds of crime.

19. There have long been concerns about the apparent wealth of students in BC post-secondaries (expensive cars, expensive houses). Should institutions be

expected to inquire into and report on the sources of students' funding like banks and casinos do?

- I've asked all post-secondary institutions to examine their current practices including refund policies and take steps to eliminating opportunities for money laundering.
- I've asked for a copy of the policies on accepting cash, providing refunds and what steps they're taking to deter money laundering.

20. The German report mentioned PSIs in passing as anecdotes, yet you speak of this like it's a crisis. Why is your letter so gentle and not more directive? Why not pass a regulation, rather than ask nicely?

- Several sectors in B.C. were identified as being potentially vulnerable to money laundering including public and private post-secondary institutions.
- There's no suggestion that institutions knowingly accepted proceeds of crime.
- We must take action to deter the ability to launder money throughout the British Columbia post-secondary system.

21. What if institutions don't comply? What's your next step?

- Dirty money is making life more expensive and hurting all of us in B.C.
- We must take action to deter the ability to launder money throughout the British Columbia post-secondary system.

22. How much is tuition?

- Undergraduate tuition fees in B.C. were an average of \$5,792 in 2018-19.
- Three to four times that for an international student.

From: [Zadravec, Don GCPE:EX](#)
To: [Heiman, Carolyn GCPE:EX](#)
Subject: RE: DRAFT Materials Money Laundering
Date: Wednesday, June 19, 2019 9:27:10 AM

Carolyn, I am good with this approach, other than the IB may be an NR depending on what the MO thinks.

Thanks,
Don

From: Heiman, Carolyn GCPE:EX
Sent: Monday, June 17, 2019 9:04 AM
To: Zadravec, Don GCPE:EX
Cc: LeGuilloux, Marg GCPE:EX
Subject: DRAFT Materials Money Laundering
Don

FYI – and of course for your comments and direction – is the draft package of materials related to the June 30 deadline for public and private post secondary institutions to review and provide their financial policies as they related to taking large cash payments and money laundering.

MO has received the critical path document and now are asking for a pitch. Draft provided here along with draft KM, etc. This package now with ADM for review but verbally I'm getting signals that the ministry, including DM, is comfortable with this approach.

If you're not already aware,^{s.22}

^{s.22} That means Jennifer the manager here will have to carry this across the line. Hence I'm wanting this well in hand before I leave.
Carolyn

Finn, Heather GCPE:EX

From: Duffus, Robert GCPE:EX
Sent: May 31, 2019 9:26 AM
To: Finn, Heather GCPE:EX
Subject: Updated AG AML complan
Attachments: AML Complan 2019 - Updated May 30.docx

Heather, for your files, here's our latest anti money laundering complan. What is today's meeting about? Would it be appropriate for Megan Harris (with the AML secretariat) to attend?

Thanks!

Rob

From: Dargie, Cathy GCPE:EX
Sent: May 30, 2019 4:13 PM
To: Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>
Cc: Hurrell, Lara GCPE:EX <Lara.Hurrell@gov.bc.ca>
Subject: Use this one: AML Complan 2019 - Updated May 30

Hi Rob

Here you go. New and improved. Thanks to Lara for flagging need for new AEST references.

Cathy

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Withheld pursuant to/removed as

s.13; s.17

Page 403 of 474

Withheld pursuant to/removed as

s.17; s.13

Page 404 of 474 to/à Page 406 of 474

Withheld pursuant to/removed as

s.13; s.17

Page 407 of 474

Withheld pursuant to/removed as

s.17; s.13

Page 408 of 474 to/à Page 414 of 474

Withheld pursuant to/removed as

s.13; s.17

Finn, Heather GCPE:EX

From: Duffus, Robert GCPE:EX
Sent: May 24, 2019 7:58 AM
To: Finn, Heather GCPE:EX
Cc: Zadavec, Don GCPE:EX
Subject: AG AML Complan 2019
Attachments: AML Complan 2019 - Updated May 22.docx

Hi Heather,

Thanks for the AML meeting yesterday. For your info, here's our complan on the topic. The rollout items and timelines are quite dodgy at this point, but you'll see the trajectory and we will look for opportunities to bundle.

Cathy Dargie in our shop holds the pen.

Cheers,
Rob

Rob Duffus
Communications Manager
Ministry of Attorney General
778 974-3334
778 678-9071 (cell)

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Withheld pursuant to/removed as

s.13; s.17

Page 429 of 474

Withheld pursuant to/removed as

s.17; s.13

Finn, Heather GCPE:EX

From: Aaron, Sage PREM:EX
Sent: May 9, 2019 3:44 PM
To: Finn, Heather GCPE:EX; Holmwood, Jen PREM:EX; Smith, George PREM:EX; Gibbs, Robb GCPE:EX
Cc: Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Poorooshasb, Nammi GCPE:EX; Marriott, Sarah GCPE:EX; Smith, Jimmy GCPE:EX
Subject: RE: AML Com plan

George!

From: Finn, Heather GCPE:EX
Sent: May 9, 2019 3:35 PM
To: Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: RE: AML Com plan

Great! Who is on this?

Heather Finn
778-679-2104

From: Aaron, Sage PREM:EX
Sent: May 9, 2019 3:19 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: RE: AML Com plan

I believe Rob Shaw has a request in for AGDE (& maybe MCJ) for his Monday column that could fill that need quite nicely.

From: Finn, Heather GCPE:EX
Sent: May 9, 2019 3:01 PM
To: Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Holmwood, Jen PREM:EX <Jen.Holmwood@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>; Gibbs, Robb GCPE:EX <Robb.Gibbs@gov.bc.ca>
Cc: Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Poorooshasb, Nammi GCPE:EX <Nammi.Poorooshasb@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>
Subject: AML Com plan

Hi all,

Since Premier isn't doing his weekly scrum today and the Ministers' response on this was more vague (currently before cabinet, answer soon) do we need to find a way to fulfill part three of the roll out in the attached plan?

Please advise.

Thanks!

Heather Finn

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

Finn, Heather GCPE:EX

From: Harris, Megan AG:EX
Sent: May 7, 2019 6:52 PM
To: Finn, Heather GCPE:EX
Subject: Re: AML Critical Path

Hi Heather,

I did and he doesn't have any. He said that he was going to wait to hear from Maureen at the dry run and then work through some that night.

We met with MDE after today and Peter has an idea of what he wants to say. It will be more about "what they saw, what they found" and areas that was concerning such as data collection concerns. He will also speak to the "other areas" including criminal prosecution.

Megan

On May 7, 2019, at 6:47 PM, Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca> wrote:

Hi Megan, if you could ask him for a copy of his speaking notes too that would be great. Will help folks prepare for the dry run.

Thanks

Heather Finn
778-679-2104

From: Harris, Megan AG:EX
Sent: May 7, 2019 3:45 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>
Subject: RE: AML Critical Path

Yup, we told him we needed it in the morning.

Megan Harris
Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
Phone: 778.974.5965 | Mobile: 250.893.3900

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 3:07 PM
To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
Subject: RE: AML Critical Path

Also, we will need PG's deck before hand so we can set it up for the dry run.

Thanks!

Heather Finn

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 2:54 PM
To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
Subject: RE: AML Critical Path

Great if you can join but if not no worries. There will be enough of us there lol. Can you please take care of forwarding the invite to PG though?

Heather Finn
778-679-2104

From: Harris, Megan AG:EX
Sent: May 7, 2019 2:39 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>
Subject: RE: AML Critical Path

On the run through, I don't think you need me there, do you? I will be there on Thursday early.

Megan Harris
Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
Phone: 778.974.5965 | Mobile: 250.893.3900

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 2:22 PM
To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
Subject: RE: AML Critical Path

Hi Megan, Comm plan attached. I've just been sorting out the dry run for tomorrow evening. It will be in the press theatre at 6:30 (might be slightly later if media is still in there). Invite to come soon.

Thanks

Heather Finn
778-679-2104

From: Harris, Megan AG:EX
Sent: May 7, 2019 1:42 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>
Subject: RE: AML Critical Path

Thanks Heather. So it says AML comms plan but I have one that we created here, so I am curious which one is the one that Robb is responsible for? s.22 trying to get caught up as fast as I can since I am the AML lead. I haven't seen anything come through for approvals in my office.

Can you loop me in on this as well as the "message guide"?

In regards to the hard copies of the German report, you can put my name next to that since we have already sent to print and will be arriving at the AG MO tomorrow afternoon.

Also, do we have a time for the run through? I need to let PG know so he can get on an appropriate flight.

Thanks,
Megan

Megan Harris

Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
Phone: 778.974.5965 | Mobile: 250.893.3900

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 1:16 PM
To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
Subject: FW: AML Critical Path

Failed to copy you on this. Sorry 😊

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (<Robb.Gibbs@gov.bc.ca> <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (<Katie.Robb@gov.bc.ca> <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Harris, Megan AG:EX
Sent: May 7, 2019 3:44 PM
To: Finn, Heather GCPE:EX
Cc: Pearson, Barbera AG:EX
Subject: RE: AML Critical Path

Done! Someone will need to meet him at security and bring him down to the theatre. I also forwarded it to Doug Scott as "optional".

Megan

Megan Harris

Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
Phone: 778.974.5965 | Mobile: 250.893.3900

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Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
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Subject: AML Critical Path

Heather Finn

Director – Cabinet Priorities

Government Communications and Public Engagement

Heather.Finn@gov.bc.ca

778-679-2104

Finn, Heather GCPE:EX

From: Harris, Megan AG:EX
Sent: May 7, 2019 2:37 PM
To: Finn, Heather GCPE:EX
Subject: RE: AML Critical Path

Thanks Heather. Can you make sure I am included in the approval train going forward? There is context I may have on the German file that others in finance or HQ do not.

Thanks,
Megan

Megan Harris

Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
Phone: 778.974.5965 | Mobile: 250.893.3900

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 2:22 PM
To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
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778-679-2104

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Sent: May 7, 2019 1:42 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>
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Executive Director, Corporate Priorities & Strategic Engagement
Associate Deputy Minister's Office | Ministry of Attorney General
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From: Finn, Heather GCPE:EX
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To: Harris, Megan AG:EX <Megan.Harris@gov.bc.ca>
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778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Harder, Derrick AG:EX
Sent: May 7, 2019 1:59 PM
To: Finn, Heather GCPE:EX; Smith, Jessica C AG:EX
Subject: RE: AML Critical Path

Hard copies of German report are being printed and will be delivered to our office at the Leg – 232. We will bring them down on Thursday from here.

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 1:17 PM
To: Harder, Derrick AG:EX <Derrick.Harder@gov.bc.ca>; Smith, Jessica C AG:EX <Jessica.C.Smith@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Spilker, Robyn FIN:EX <Robyn.Spilker@gov.bc.ca>
Subject: FW: AML Critical Path

FYI – critical path for the comms products

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (<Robb.Gibbs@gov.bc.ca> <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (<Katie.Robb@gov.bc.ca> <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Duffus, Robert GCPE:EX
Sent: May 7, 2019 1:57 PM
To: Finn, Heather GCPE:EX
Subject: RE: AML Critical Path

Noted! Thanks Heather.

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:16 PM
To: Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>
Subject: RE: AML Critical Path

Please note the comments section for the drafts you are prepping for next week.

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (<Robb.Gibbs@gov.bc.ca> <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (<Katie.Robb@gov.bc.ca> <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Hardin, Karl GCPE:EX
Sent: May 7, 2019 1:37 PM
To: Finn, Heather GCPE:EX
Subject: Re: AML Critical Path

I don't know what this is.

--

Karl Hardin

Executive Director | Digital Communications
Government Communications and Public Engagement
Cell: (778) 584 1251

From: "Finn, Heather GCPE:EX" <Heather.Finn@gov.bc.ca>
Date: Tuesday, May 7, 2019 at 1:05 PM
To: "Gibbs, Robb GCPE:EX" <Robb.Gibbs@gov.bc.ca>, "Dalzell, Danielle GCPE:EX" <Danielle.Dalzell@gov.bc.ca>, "Devereux, Rick GCPE:EX" <Rick.Devereux@gov.bc.ca>, "Duffus, Robert GCPE:EX" <Robert.Duffus@gov.bc.ca>, Katie Robb <Katie.Robb@gov.bc.ca>, "Smith, Jimmy GCPE:EX" <Jimmy.Smith@gov.bc.ca>, "Marriott, Sarah GCPE:EX" <Sarah.Marriott@gov.bc.ca>, "Hardin, Karl GCPE:EX" <Karl.Hardin@gov.bc.ca>, "Aaron, Sage PREM:EX" <Sage.Aaron@gov.bc.ca>, George Smith <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn

Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Gibbs, Robb GCPE:EX
Sent: May 6, 2019 9:54 AM
To: Finn, Heather GCPE:EX
Subject: complan
Attachments: AML-Complan-RGG-V2.docx

Page 444 of 474 to/à Page 447 of 474

Withheld pursuant to/removed as

s.12; s.13; s.17

Finn, Heather GCPE:EX

From: Robb, Katie GCPE:EX
Sent: May 5, 2019 8:39 PM
To: Finn, Heather GCPE:EX
Subject: Draft agenda

You may have things to add? It looks kind of hefty but I want to make sure we cover everything!

1. Overview of narrative, message arc, message testing, timeline – HF
2. Tuesday announcement – HF/Rob D
 - a. Event plan + logistics – Rob D/Rick D
 - b. Comms materials – HF/AG comms
 - c. Digital materials (?)
 - d. Translations – HF/Rob D
 - e. Outstanding approvals - HF
3. Thursday announcement – HF/KR
 - a. Event plan, logistics, tech briefing – KR/Rick D
 - b. Comms materials – KR/HF/Rob D
 - c. Digital materials (?)
 - d. Translations – KR/HF
 - e. Approvals timeline – KR/HF
4. Critical path - HF

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

Page 449 of 474 to/à Page 450 of 474

Withheld pursuant to/removed as

s.13; s.17

Finn, Heather GCPE:EX

From: Robb, Katie GCPE:EX
Sent: May 3, 2019 4:35 PM
To: Devereux, Rick GCPE:EX; Harder, Derrick AG:EX; Lawson, Liam FIN:EX; Smith, George PREM:EX; Finn, Heather GCPE:EX; Duffus, Robert GCPE:EX
Subject: RE: Questions for Tuesday and Thursday

Thanks Rick – looking forward to discussing all the finer points Monday!

Katie Robb

Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

From: Devereux, Rick GCPE:EX
Sent: Friday, May 3, 2019 4:26 PM
To: Harder, Derrick AG:EX; Lawson, Liam FIN:EX; Smith, George PREM:EX; Finn, Heather GCPE:EX; Robb, Katie GCPE:EX; Duffus, Robert GCPE:EX
Subject: Questions for Tuesday and Thursday

Hi All,

Just wanted to flag a few things for all of you and your consideration for Tuesday and Thursday. Some of this may be obvious, but I figured it was better to be sure. We can also discuss in person Monday morning.

TUESDAY:

My understanding is that Tuesday's event will just be Minister Eby, in the Hall of Honour, with a podium and maybe a flatscreen at 11am. He will speak and be joined by no one. Please let me know if any of that is wrong.

THURSDAY:

For Thursday, I want to make sure I understand the plan is for there to be a technical briefing with Mr German and Ms Maloney, one after another, followed by the two ministers doing a presser with Q&A, all of this in the Press Theatre.

TIMING: I'm told the plan is for this whole thing to be done by QP because to do otherwise would be problematic for the media. I understand that we should plan for near to 30 minutes each for presentation and Q&A from German and Maloney, meaning they should start at 8:15 AM or so, and there will be a bit of a break before the Ministers start at 9:15 AM. Just wanted to flag that this is tremendously early for the press gallery. If the plan to not interfere with QP is solely to not annoy media, just wanted to flag that this start time will as well, and so we might want to re-evaluate the timing and the reasoning behind which timing we choose.

My other questions/assumptions for thoughts and corrections:

- The basic sequence is
 - German presentation,
 - German Q&A,
 - Maloney Presentation,
 - Maloney Q&A,
 - Ministers enter and make statement,
 - Ministers Q&A

- The German and Maloney portions are a full on technical briefing, with a connection to a secondary tech briefing room in Vancouver, and no other ability to join. One must be in the Press Theatre or the room in Vancouver to hear/see the German and Maloney portions or to ask German or Maloney a question. No other phone participation.
- Both German and Maloney will have a PPT presentation. Will these presentations be done with the same graphic design? (They should be), and I assume that someone in graphics will work on them.
- Will there be paper copies of the reports on hand? Unless they are quite nice, this seems unnecessary given the size.
- REHEARSAL: will German and Maloney rehearse in person with Q&A from staff substituting as media? (they absolutely should). I'd suggest rehearsing in the theatre itself if that is possible, but that means doing so at around 6:00 or 6:30 PM, as the media has offices in the press theatre and we need to wait for them to leave. We could do that Wednesday evening. I think doing this is mandatory, given the scrutiny here. If we cannot wait until after 630pm on Wednesday, then in person in a boardroom or something could work as a replacement. In person is also important. Really, really want to stress that this should happen.
- WEDNESDAY ARRIVAL: And this is perhaps obvious given what I've just said, but they should be here Wednesday!! This all happening as planned should not be subject to the wind speed on Thursday morning.
- The Ministers will not have a PPT presentation to go through, they will just deliver remarks one after another and take questions.

I'll leave it there and we can discuss as needed.

Thanks

Rick

Finn, Heather GCPE:EX

From: Harder, Derrick AG:EX
Sent: May 3, 2019 4:25 PM
To: Robb, Katie GCPE:EX
Cc: Devereux, Rick GCPE:EX; Finn, Heather GCPE:EX; Smith, George PREM:EX; Lawson, Liam FIN:EX; Duffus, Robert GCPE:EX
Subject: Re: AML Coordination

I can do 11. But not 10:30

Sent from my iPhone

> On May 3, 2019, at 4:23 PM, Robb, Katie GCPE:EX <Katie.Robb@gov.bc.ca> wrote:

>

> Hi all, thought it might be a good idea to get us all in the same room to talk sequencing, roll out and deliverables for next week. I hope this works for all!

>

> <meeting.ics>

Finn, Heather GCPE:EX

From: Smith, Jimmy GCPE:EX
Sent: May 3, 2019 1:26 PM
To: Finn, Heather GCPE:EX
Subject: attached
Attachments: Money Laundering roll out.docx

Page 455 of 474

Withheld pursuant to/removed as

s.13; s.17

Page 456 of 474

Withheld pursuant to/removed as

s.17; s.13

Page 457 of 474

Withheld pursuant to/removed as

s.13; s.17

Finn, Heather GCPE:EX

From: Marriott, Sarah GCPE:EX
Sent: May 2, 2019 3:01 PM
To: Gibbs, Robb GCPE:EX; Finn, Heather GCPE:EX; Harder, Derrick AG:EX; Smith, Jessica C AG:EX; Lawson, Liam FIN:EX; Smith, Jimmy GCPE:EX; Smith, George PREM:EX
Subject: To-do list (to send to comms shops ASAP)

Hi all,

Thanks for connecting today.

Below is the list of materials for next week's announcements. Can you please send this breakdown to your comms shops ASAP? The deadlines are very tight.

All materials will be taken care of by the listed lead GCPE shop, unless otherwise indicated. Heather Finn is available to support the comms shops as well.

Feel free to give me a ring if you have any comments or additions,

Sarah

Sarah Marriott
Issues Manager
250.361.8416

Horses & cars – May 7 (MDE)

- Lead: **AG GCPE**
- Materials:
 - NR & KMs
 - Speaking notes if MDE will want them – at a minimum will need KMs in front of him
 - Very short KM - **Sarah**
- Deadlines:
 - End of day Friday, May 3 for first draft from GCPE
 - Sunday, May 5 for draft from MDE to be edited by GCPE HQ

Full German & Maloney – May 9 (MCJ & MDE, plus German & Maloney)

- Lead: **Finance GCPE**, supported by AG GCPE and Heather
- Materials:
 - KM, NR, QA
 - SNs for MCJ and MDE
 - Tech briefing deck
 - Backgrounder / report highlights
 - German – **Jessica** (understand you're working on this Jess?)
 - Maloney – **Liam & James**
 - German & Maloney's speaking notes – **German & Maloney (to be reviewed by their respective MOs)**
- Deadlines:
 - End of day Monday, May 6 for all government materials
 - End of day Tuesday, May 7 for German and Maloney's speaking notes

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 2:23 PM
To: Harder, Derrick AG:EX; Smith, Jessica C AG:EX
Subject: RE: AML Critical Path

Wonderful. Thanks so much.

Heather Finn
778-679-2104

From: Harder, Derrick AG:EX
Sent: May 7, 2019 1:59 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>; Smith, Jessica C AG:EX <Jessica.C.Smith@gov.bc.ca>
Subject: RE: AML Critical Path

Hard copies of German report are being printed and will be delivered to our office at the Leg – 232. We will bring them down on Thursday from here.

From: Finn, Heather GCPE:EX
Sent: Tuesday, May 7, 2019 1:17 PM
To: Harder, Derrick AG:EX <Derrick.Harder@gov.bc.ca>; Smith, Jessica C AG:EX <Jessica.C.Smith@gov.bc.ca>; Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>; Spilker, Robyn FIN:EX <Robyn.Spilker@gov.bc.ca>
Subject: FW: AML Critical Path

FYI – critical path for the comms products

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (<Robb.Gibbs@gov.bc.ca>) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (<Katie.Robb@gov.bc.ca>) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:37 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca); Dalzell, Danielle GCPE:EX; Devereux, Rick GCPE:EX; Duffus, Robert GCPE:EX; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca); Smith, Jimmy GCPE:EX; Marriott, Sarah GCPE:EX; Hardin, Karl GCPE:EX; Aaron, Sage PREM:EX; Smith, George PREM:EX; Harris, Megan AG:EX
Cc: Lawson, Liam FIN:EX; Spilker, Robyn FIN:EX; Harder, Derrick AG:EX; Smith, Jessica C AG:EX
Subject: RE: AML Critical Path

Hi folks,

I just want to clarify that by “responsible” I mean the person tasked with getting the product across the finish line and ensuring that everyone one who needs to provide feed back (MOs, Issues, etc) has been looped in.

Thanks

HF

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:17 PM
To: Harder, Derrick AG:EX; Smith, Jessica C AG:EX; Lawson, Liam FIN:EX; Spilker, Robyn FIN:EX
Subject: FW: AML Critical Path
Attachments: 20190507 AML Critical Path.xlsx

FYI – critical path for the comms products

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

AML - Critical Path						
Task	Drafter	Responsible	Drafter Deadline	To PO for Review	Finish	Comments
AML Comms Plan	Finn	Gibbs		4-May-19	6-May-19	
AML Message Guide		Finn/Danielle	07-May	8-May-19	8-May-19	
May 9 - EVENT		Rick			9-May-19	
May 9 - Media Advisory	FIN COMMS	Finn	07-May		8-May-19	
May 9 - Key Messages	FIN COMMS	Finn	07-May		8-May-19	
May 9 - Links to reports for NR		FIN COMMS			9-May-19	
May 9 - Hard copies of German report		AG COMMS			9-May-19	
May 9 - Hard copies of Maloney report		FIN COMMS			9-May-19	
May 9 - News Release	FIN COMMS	Finn	07-May		8-May-19	
May 9 - QA	FIN COMMS	Jimmy	07-May		8-May-19	
May 9- MDE Speaking Notes	AG COMMS	Finn	07-May		8-May-19	
May 9 - MCJ Speaking Notes	FIN COMMS	Katie/Finn	07-May		8-May-19	
May 9 - Maloney Report Backgrounder/Deck	May 9 - Maloney Report Backgrounder/Deck	May 9 - Maloney Report Backgrounder/Deck	May 9 - Maloney Report Backgrounder/Deck		8-May-19	
May 9 - German Report Backgrounder/Deck	From German; Megan Harris is AG contact	Finn	08-May		8-May-19	
May 9 - ReviewGerman Speaking Notes	From German; Megan Harris is AG contact	Sarah	08-May		8-May-19	
May 9 - Review Maloney Speaking Notes	From Maloney - Katie Robb is FIN contact	Jimmy	08-May			
May 9 - Post announcement Media MCJ MDE		FIN COMMS				
May 15 - EVENT		Rick			15-May-19	
May 15 - Media Advisory	AG COMMS	Finn	09-May	10-May-19	13-May-19	
May 15 - Option A News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Draft to Danielle by Noon please
May 15 - Option B News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS:Draft to Danielle by Noon please
May 15 - QA		ISSUES	09-May	10-May-19	13-May-19	
May 15 - Option A PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this
May 15 - Option B PJH Speaking Notes	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Only bullets required from you for this
May 15 - Post Announcement Media MCJ MDE		FIN COMMS				
May 15 - Op-Ed		Danielle				
May 15 - Digital	AG & FIN COMMS	Karl				

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:16 PM
To: Harris, Megan AG:EX
Subject: FW: AML Critical Path
Attachments: 20190507 AML Critical Path.xlsx

Failed to copy you on this. Sorry 😊

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

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May 9 - MCJ Speaking Notes	FIN COMMS	Katie/Finn	07-May		8-May-19	
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May 9 - German Report Backgrounder/Deck	From German; Megan Harris is AG contact	Finn	08-May		8-May-19	
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May 15 - Option A News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS: Draft to Danielle by Noon please
May 15 - Option B News Release	AG COMMS	Danielle	09-May	10-May-19	13-May-19	AG COMMS:Draft to Danielle by Noon please
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May 15 - Op-Ed		Danielle				
May 15 - Digital	AG & FIN COMMS	Karl				

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:16 PM
To: Duffus, Robert GCPE:EX
Subject: RE: AML Critical Path

Please note the comments section for the drafts you are prepping for next week.

Heather Finn
778-679-2104

From: Finn, Heather GCPE:EX
Sent: May 7, 2019 1:05 PM
To: Gibbs, Robb GCPE:EX (Robb.Gibbs@gov.bc.ca) <Robb.Gibbs@gov.bc.ca>; Dalzell, Danielle GCPE:EX <Danielle.Dalzell@gov.bc.ca>; Devereux, Rick GCPE:EX <Rick.Devereux@gov.bc.ca>; Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>; Katie GCPE:EX Robb (Katie.Robb@gov.bc.ca) <Katie.Robb@gov.bc.ca>; Smith, Jimmy GCPE:EX <Jimmy.Smith@gov.bc.ca>; Marriott, Sarah GCPE:EX <Sarah.Marriott@gov.bc.ca>; Hardin, Karl GCPE:EX <Karl.Hardin@gov.bc.ca>; Aaron, Sage PREM:EX <Sage.Aaron@gov.bc.ca>; Smith, George PREM:EX <George.Smith@gov.bc.ca>
Subject: AML Critical Path

Heather Finn
Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
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Subject: AML Critical Path
Attachments: 20190507 AML Critical Path.xlsx

Heather Finn

Director – Cabinet Priorities
Government Communications and Public Engagement
Heather.Finn@gov.bc.ca
778-679-2104

AML - Critical Path						
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May 15 - Post Announcement Media MCJ MDE		FIN COMMS				
May 15 - Op-Ed		Danielle				
May 15 - Digital	AG & FIN COMMS	Karl				

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 5, 2019 9:23 PM
To: Robb, Katie GCPE:EX
Subject: RE: Draft agenda

I think you covered everything

Heather Finn
778-679-2104

From: Robb, Katie GCPE:EX
Sent: May 5, 2019 8:39 PM
To: Finn, Heather GCPE:EX <Heather.Finn@gov.bc.ca>
Subject: Draft agenda

You may have things to add? It looks kind of hefty but I want to make sure we cover everything!

1. Overview of narrative, message arc, message testing, timeline – HF
2. Tuesday announcement – HF/Rob D
 - a. Event plan + logistics – Rob D/Rick D
 - b. Comms materials – HF/AG comms
 - c. Digital materials (?)
 - d. Translations – HF/Rob D
 - e. Outstanding approvals - HF
3. Thursday announcement – HF/KR
 - a. Event plan, logistics, tech briefing – KR/Rick D
 - b. Comms materials – KR/HF/Rob D
 - c. Digital materials (?)
 - d. Translations – KR/HF
 - e. Approvals timeline – KR/HF
4. Critical path - HF

Katie Robb
Communications Director | Ministry of Finance
Government Communications & Public Engagement
O: [250.953.4865](tel:250.953.4865) | M: [250.920.8371](tel:250.920.8371)

Finn, Heather GCPE:EX

From: Finn, Heather GCPE:EX
Sent: May 31, 2019 9:50 AM
To: Duffus, Robert GCPE:EX
Subject: Re: Updated AG AML complan

Possible Federal summit on AML in two weeks. Check with your MO but i have no problem with Megan attending.

Sent from my iPhone

On May 31, 2019, at 9:26 AM, Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca> wrote:

Heather, for your files, here's our latest anti money laundering complan. What is today's meeting about? Would it be appropriate for Megan Harris (with the AML secretariat) to attend?

Thanks!

Rob

From: Dargie, Cathy GCPE:EX
Sent: May 30, 2019 4:13 PM
To: Duffus, Robert GCPE:EX <Robert.Duffus@gov.bc.ca>
Cc: Hurrell, Lara GCPE:EX <Lara.Hurrell@gov.bc.ca>
Subject: Use this one: AML Complan 2019 - Updated May 30

Hi Rob

Here you go. New and improved. Thanks to Lara for flagging need for new AEST references.

Cathy

<AML Complan 2019 - Updated May 30.docx>

Page 471 of 474

Withheld pursuant to/removed as

s.13; s.17; s.12

Page 472 of 474 to/à Page 474 of 474

Withheld pursuant to/removed as

s.12; s.13; s.17

D'Argis, Krista GCPE:EX

From: Heiman, Carolyn GCPE:EX
Sent: Monday, June 17, 2019 3:41 PM
To: Snoddon, Michael AEST:EX
Cc: Wolfe, Seamus AEST:EX; Cardona, Diego AEST:EX; Flesh, Cindy AEST:EX; Fernandes, Jennifer GCPE:EX
Subject: GCPE Comms pitch for June 30 Money Laundering
Attachments: QA_AEST_Money Laundering_June 25.docx; IB_Money Laundering_Dr1June 14.docx; Critical Path PSI Money Laundering.docx; AEST - Communications Pitch - Money Laundering.docx

Michael

Please find DM approved materials related to communications strategy for June 30th deadline for post secondary institutions to report our on financial policies related to potential money laundering. Attached:

- Critical path chart
- Communications Pitch
- Draft IB
- Draft QA.

Carolyn

Page 02 of 11 to/à Page 05 of 11

Withheld pursuant to/removed as

s.13; s.17

Page 06 of 11

Withheld pursuant to/removal as

s.13

Questions & Answers

Money laundering in B.C.'s post-secondary sector

Ministry of Advanced Education, Skills and Training
June 2019

1. Did all public and private institutions meet the June 30th deadline to provide the ministry with information about their policies related to money laundering?

- Xyxyxyxyx
- Xyyxyxy
-

2. What action will the ministry take on those who didn't meet the deadline?

- The Ministry is contacting each of the institutions that did not meet the deadline to remind them to submit the needed information to the Ministry.

3. What did you discover about the state of policies among institutions in BC?

- It's too early to make any observations about the information received?
- Ministry staff will use the next few months to evaluate the data gathered and then determine what, if any, actions are required.

4. What vulnerabilities are there now with the existing policies?

- My responsibility is to ensure BC's post-secondary system is not enabling money laundering.
- In the interest of security, we will not be providing details on individual practices.
- We will respect the confidentiality of each institution's financial policy.
- My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.

5. What will you do if you find any vulnerabilities at an institution?

- In the interest of security, we will not be providing details on individual practices.
 - We will respect the confidentiality of each institution's financial policy.
 - My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.
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- If there are any potential vulnerabilities, we will be expecting those institutions to take corrective action to ensure their financial policies are not a potential target for money laundering.

6. Will you report out on the results from your letter? Will you disclose what policies are currently in place and what changes you require?

- My responsibility is to ensure BC's post-secondary system is not enabling money laundering.
- We will respect the confidentiality of each institution's financial policy.
- My Ministry will be discussing any potential vulnerabilities with respective institutions on a one-by-one basis.
- If there are any potential vulnerabilities, we will be expecting those institutions to take corrective action to ensure their financial policies are not a potential target for money laundering.

7. Why did you write to all the public and private post-secondary institutions?

- Dirty money is making life more expensive and hurting all of us in B.C.
- The second German report highlighted public and private post-secondary institutions as one of several vulnerable sectors for money laundering.
- We're doing our part to detect, deter and prevent the ability to launder money in B.C.'s post-secondary system.
- We must raise awareness and take action to detect, deter and prevent the ability to launder money throughout the post-secondary system.
- B.C.'s post-secondary institutions have an excellent reputation.
- While the German report did not focus on the education sector, it is our collective responsibility to ensure that we address any vulnerabilities that may exist.

8. What did you ask post-secondary sector to do in the letter?

- I've asked all post-secondary institutions to examine their current practices and take steps to eliminating opportunities for money laundering.
- I've asked each institution for a copy of the policies on accepting cash, providing refunds and what steps they're taking to deter money laundering.

9. Are public or private institutions laundering money?

- It's important to note that these are allegations.
- Several sectors in B.C. were identified as being vulnerable to money laundering including public and private post-secondary institutions.

- Other vulnerable sectors: watercraft, auction houses, fisheries quotas cryptocurrency and foreign credit cards.
- There's no suggestion that institutions knowingly accepted proceeds of crime.

10. How do you define “large cash payments”?

- Payments in the thousands of dollars.

11. Why not ban large cash payments altogether?

- It is important to balance the need for institutions to accept some cash payments from students, while not becoming a target for money laundering

12. Why not ban cash payments for tuition from international students?

- It would not be fair or realistic to single out just one group of students.

13. Are you prepared to ban cash payments entirely if it appears there are serious vulnerabilities?

- It is premature to draw conclusions at this time.
- It's also important to balance the need for institutions to accept some cash payments from students, while not becoming a target for money laundering

14. Are post-secondary institutions in B.C. required to report large cash payments to FinTrac?

- Only financial institutions and designated businesses such as money service businesses or securities firms are required to report under FinTrac for large cash deposits.

15. The examples in the German report were under \$10,000, which is the FINTRAC reporting threshold. What threshold for “large cash” payments do you have in mind? Isn't your letter an over-reaction?

- Public and private post-secondary institutions are responsible for managing their activities, including collecting student tuition and other fees.
- The day-to-day handling of money is carried out by the individual institution.
- I have asked post-secondary institutions to review their policies following the German report.
- I can't stress enough that it is our collective responsibility to ensure that we address any vulnerabilities that may exist.

16. What are the current policies around accepting cash payments?

- There's no single policy.
- Public and private post-secondary institutions are responsible for managing their activities, including collecting student tuition and other fees.
- The day-to-day handling of money is carried out by the individual institution.
- Nevertheless, I have asked all post-secondary institutions to review their policies following the German report.

17. How many post-secondary institutions are there?

- 25 public and about 350 private post-secondary institutions.

18. When did you first become aware of the allegations?

- The same time as the rest of my cabinet colleagues.

19. Are you going to investigate the extent of money laundering in the post-secondary sector to get a full picture?

- Gov't accepted the recommendations and findings of the report.
- In response, Premier Horgan announced a public inquiry.

20. Will post-secondary institutions be included in the public inquiry?

- That's not up to me as minister.
- A public inquiry into money laundering was announced on May 15 by Premier John Horgan.
- B.C. Supreme Court Justice Austin Cullen will head the inquiry. He's been given the power to compel witnesses and order documents to be disclosed.

18. There are suggestions some casinos turned a blind eye to money-laundering – do you think that's a problem in the post-secondary sector?

- Several sectors in B.C. were identified as being potentially vulnerable to money laundering, including public and private post-secondary institutions.
- It's important to note that these are allegations.
- There's no suggestion that institutions acted inappropriately or knowingly accepted proceeds of crime.

19. There have long been concerns about the apparent wealth of students in BC post-secondaries (expensive cars, expensive houses). Should institutions be

expected to inquire into and report on the sources of students' funding like banks and casinos do?

- I've asked all post-secondary institutions to examine their current practices including refund policies and take steps to eliminating opportunities for money laundering.
- I've asked for a copy of the policies on accepting cash, providing refunds and what steps they're taking to deter money laundering.

20. The German report mentioned PSIs in passing as anecdotes, yet you speak of this like it's a crisis. Why is your letter so gentle and not more directive? Why not pass a regulation, rather than ask nicely?

- Several sectors in B.C. were identified as being potentially vulnerable to money laundering including public and private post-secondary institutions.
- There's no suggestion that institutions knowingly accepted proceeds of crime.
- We must take action to deter the ability to launder money throughout the British Columbia post-secondary system.

21. What if institutions don't comply? What's your next step?

- Dirty money is making life more expensive and hurting all of us in B.C.
- We must take action to deter the ability to launder money throughout the British Columbia post-secondary system.

22. How much is tuition?

- Undergraduate tuition fees in B.C. were an average of \$5,792 in 2018-19.
- Three to four times that for an international student.