

## **FW: Reminder: SIRs required for Cash Transactions in excess of \$10K**

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From: Castaneto, Jonathan LDB:EX <Jonathan.Castaneto@bclddb.com>  
To: McEwan, Erin LDB:EX <Erin.McEwan@bclddb.com>  
Sent: November 12, 2021 2:24:29 PM PST  
Attachments: image001.gif, image002.gif, Large Cash Transactions (Liquor).docx

Hi Erin,

We've sent out the reminder (below) and I've also talked to the store managers of both 39<sup>th</sup> & Cambie and Park Royal and given them direction to email you if/when the store processes a large cash transaction. I've also sent an email to the manager of Brighthouse (he is s.22 but will be in tomorrow for the release) and have given him the same direction.

Thank you,

### **Jonathan Castaneto**

Director of Store Operations, Retail Services - Store Operations Admin Summary  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604-252-8598 E: [jonathan.castaneto@bclddb.com](mailto:jonathan.castaneto@bclddb.com)

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**From:** LDB Store Ops Admin LDB:EX s.17

**Sent:** November 12, 2021 2:12 PM

**To:** LDB Store Ops Admin LDB:EX s.17

s.17 ; LDB D SO All Stores s.17

LDB D SO All Store Managers

LDB D SO Assistant Managers

**Cc:** LDB D SO Regional Managers s.17

LDB D IT Retail Liquor Support Team

s.17 Alexander, Brendan LDB:EX <Brendan.Alexander@bclddb.com>; Cheema, Aman

LDB:EX <aman.cheema@bclddb.com>

**Subject:** Reminder: SIRs required for Cash Transactions in excess of \$10K

### **The below message is sent on behalf of Store Operations:**

With the upcoming Spirit Release and holiday season, stores may encounter large cash transactions.

Please be reminded that, as per the "Large Cash transactions" policy (attached), all cash transactions in excess of \$10,000 (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be counted twice: First, in front of the customer and then, immediately upon completion of the sale, in the Cash Room.

The Manager on Duty (MOD) must be present while cash is counted: first in front of the customer and then in the Cash Room.

All cash transactions (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be reported in a Store Incident Report (SIR) by the MOD before the end of their shift.

Thank you for your continued assistance,

Store Operations



## Large Cash Transactions

---

<b>Approved By:</b>	Director, Corporate Loss Prevention
<b>Date Approved:</b>	November 2016
<b>Date of Last Review:</b>	November 2016
<b>Contact:</b>	Manager, Corporate Loss Prevention

---

### 1.0 Purpose

To provide direction to BC Liquor Store (BCLS) employees regarding cash handling when Large Cash Transactions take place in their stores.

### 2.0 Scope

This policy applies to all Large Cash Transactions at BCLSs.

### 3.0 Definitions

Cash Discriminator	A bill counting and counterfeit detector machine that is found in some BCLS locations.
Large Cash Transaction	Any transaction where all or part of the tender is cash in excess of \$10,000 Canadian (or equivalent).
SIR	Security Incident Report

### 4.0 Policy

- Cash that is part of a Large Cash Transaction must be counted twice: first, in front of the customer and then, immediately upon completion of the sale, in the Cash Room.
- Whenever there is a Large Cash Transaction, the Manager on Duty (MOD) must be present while cash is counted, first in front of the customer and then in the Cash Room.
- Before the end of their shift, employees must create an SIR for each Large Cash Transaction that they processed during that shift.
- If a customer asks for their purchases to be divided into multiple transactions but the total cash received for the transactions exceeds \$10,000 Canadian (or equivalent), the group of transactions is collectively a Large Cash Transaction and this policy still applies.
- All Large Cash Transactions will be reviewed by Corporate Loss Prevention and investigated further, depending on the circumstances.

### 5.0 Procedure

#### 5.1 Counting Cash

- The employee manually counts the cash in the presence of the customer and the MOD.



- The cash should then be taken immediately into the Cash Room and re-counted, again in the presence of the MOD.
- For stores that do not have a Cash Discriminator, the cash should be divided into denominations and re-counted utilizing two staff members, one of them being the MOD.
- For stores with a Cash Discriminator, the cash should be counted using the machine in the Cash Room with two employees present, one of them being the MOD.

## **5.2 Creating an SIR**

- Create an SIR by going to the Intranet and selecting "Reporting Corporate Security Incidents" This will take the user to the e-Reporting application.
- Fill in the applicable information under each tab.
- Under the "Incident Information" tab in particular, select the following information:  
Class: Non Criminal  
Category: Finance
- For stores that do not have a Cash Discriminator, the Narrative should include:
  - The transaction number(s) from the point-of-sale for the transaction(s);
  - The total amount of cash received;
  - The number of each denomination of bills received;
  - That this was a manual count, done first in the presence of the customer, and then in the Cash Room; and
  - The names of the employee(s) who performed the count.
- For stores that have a Cash Discriminator, the Narrative should include:
  - The transaction number(s) from the point-of-sale for the transaction(s);
  - The total amount of cash received;
  - The number of each denomination of bills received;
  - That this count was done manually first in the presence of the customer, and then done by machine in the Cash Room; and
  - The name of the employee(s) who performed the count.
- Once submitted, all SIRs are reviewed by Corporate Loss Prevention.

## **5.3 Suspicious Transactions**

- If an employee believes that a Large Cash Transaction is suspicious, they should follow the procedures set out in the "Suspicious Transactions" policy.

## **6.0 Responsibilities**

### Store Managers and Regional Managers

- Ensure that employees are aware of this policy and comply with it.

### BCLS Employees

- Comply with the procedures for counting cash that is part of a Large Cash Transaction.
- Create an SIR for all Large Cash Transactions before the end of their shift.
- Comply with the "Suspicious Transactions" policy whenever they believe that a Large Cash Transaction is suspicious.



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## Policies and Procedures

### Corporate Loss Prevention

- Review all SIRs.
- If necessary, investigate a Large Cash Transaction.

### **7.0 Appendix**

#### Suspicious Transactions

## **FW: Reminder: SIRs required for Cash Transactions in excess of \$10K**

---

From: Castaneto, Jonathan LDB:EX <Jonathan.Castaneto@bclddb.com>  
To: Hill, Trevor LDB:EX <Trevor.Hill@bcliquorstores.com>, Rodney, Cyril LDB:EX <Cyril.Rodney@bclddb.com>, Cacic, Anthony LDB:EX <anthony.cacic@bclddb.com>  
Sent: November 12, 2021 2:30:56 PM PST  
Attachments: image002.gif, image001.gif, Large Cash Transactions (Liquor).docx

Hi Trevor, Tony, and Cyril,

As discussed with both Trevor and Tony (Cyril I tried contacting you at the store to let you know as well), for this Spirit Release, please email Erin McEwan whenever you process a large cash transaction (ie. 10k and above).

Cyril, if you have any questions give me a call and I can provide you more context.

Thank you,

### **Jonathan Castaneto**

Director of Store Operations, Retail Services - Store Operations Admin Summary  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604-252-8598 E: [jonathan.castaneto@bclddb.com](mailto:jonathan.castaneto@bclddb.com)

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---

**From:** LDB Store Ops Admin LDB:EX<sup>s.17</sup>

**Sent:** November 12, 2021 2:12 PM

**To:** LDB Store Ops Admin LDB:EX<sup>s.17</sup>

s.17

LDB D SO All Stores<sup>s.17</sup>

LDB D SO All Store Managers

LDB D SO Assistant Managers

**Cc:** LDB D SO Regional Managers<sup>s.17</sup>

LDB D IT Retail Liquor Support Team

s.17

Alexander, Brendan LDB:EX <Brendan.Alexander@bclddb.com>; Cheema, Aman

LDB:EX <aman.cheema@bclddb.com>

**Subject:** Reminder: SIRs required for Cash Transactions in excess of \$10K

### **The below message is sent on behalf of Store Operations:**

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Please be reminded that, as per the "Large Cash transactions" policy (attached), all cash transactions in excess of \$10,000 (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be counted twice: First, in front of the customer and then, immediately upon completion of the sale, in the Cash Room.

The Manager on Duty (MOD) must be present while cash is counted: first in front of the customer and then in the Cash Room.

All cash transactions (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be reported in a Store Incident Report (SIR) by the MOD before the end of their shift.

Thank you for your continued assistance,

Store Operations

## Scan of large cash transactions for Spirit Release Nov.13th

---

From: Hill, Trevor LDB:EX <Trevor.Hill@bcliquorstores.com>  
To: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
Cc: Castaneto, Jonathan LDB:EX <Jonathan.Castaneto@bcldb.com>  
Sent: November 15, 2021 11:43:16 AM PST  
Attachments: Scan from BCLS.pdf

Hi Erin,

As discussed with Jonathan,<sup>s.15</sup>  
s.15

I assumed Monday morning would

be fine- anything else I can help with please just let me know.

Thanks, Take care

**Trevor Hill**

**Senior Store Manager- Retail Services**

Signature BC Liquor Store #160

5555 Cambie Street

Vancouver, BC V5Z 3A3

T: 604.660.9463 E:[trevor.hill@bcliquorstores.com](mailto:trevor.hill@bcliquorstores.com)

BC LIQUOR STORES - CELEBRATE LIFE...ENJOY RESPONSIBLY

**From:** BCLS160@bcliquorstores.com <BCLS160@bcliquorstores.com>

**Sent:** Monday, November 15, 2021 11:34 AM

**To:** Hill, Trevor LDB:EX

**Subject:** Scan From BCLS

Please open the attached document. It was scanned and sent to you using a Multifunction Printer.



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Withheld pursuant to/removed as

s.15

## **FW: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS**

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From: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
To: Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>, Brown, Natalie LDB:EX <Natalie.Brown@bcldb.com>  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Sent: November 15, 2021 8:51:09 PM PST  
Attachments: Re: Issues Note, image001.gif, image002.gif, 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS.docx

Hi Both,

Doug asked for an "IN" this morning and what he meant was a IBN.

Anita, Given this can you please work with Natalie and transfer the attached IN it to a IBN template. DMO has made comments in the attached and I have edited where appropriate or made comments for direction. Also, please work in the below highlighted section of info from Kim's email into the IBN.

Natalie, can you pls update the IN per comments/recommended edits as this will likely be asked for by GCPE.

This needs to be our highest priority in the morning as the MO is expecting it.

I will be on stand-by to review both. Can we please aim to have drafts ready before 10:00am?

Many thanks!

### **Erin McEwan**

Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7443 F: 604 252-3283 E: [erin.mcewan@bcldb.com](mailto:erin.mcewan@bcldb.com)

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---

**From:** Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>  
**Sent:** November 15, 2021 7:54 PM  
**To:** McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
**Cc:** Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>  
**Subject:** 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

Hi Erin,

Comments and suggested edits included in the attached, reviewed by both Doug and I. <sup>s.13</sup>  
s.13

Happy to chat further if any of this doesn't make sense. MO is expecting in the morning, so let me know if you need any help from our crew here in turning it around into an IBN.

Thx.

K

## Re: Issues Note

---

From: Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>  
To: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>, Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Sent: November 15, 2021 7:44:21 PM PST  
Attachments: image002.gif, image002.gif, image001.gif, image001.gif

Hi Erin,

Thanks I have reviewed - I have provided my comments to Kim and agree with her comments. I am sorry - I did say IN which was in error. I was thinking IBN - which is the appropriate not... my error. It should be in IBN format.

Doug

Get [Outlook for iOS](#)

**From:** McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>

**Sent:** Monday, November 15, 2021 6:22:39 PM

**To:** Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>; Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>

**Cc:** Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>

**Subject:** Issues Note

Hi Both,

Attached is the Issues Note related to large cash transactions.

Doug, I understood this morning that you were looking for an "IN" and interpreted that request to mean an Issues Note. Please let me know if you want me to convert it to a Information Note in the morning.

s.13

Let me know if you have questions or need more information.

### Erin McEwan

Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7443 F: 604 252-3283 E: [erin.mcewan@bcldb.com](mailto:erin.mcewan@bcldb.com)

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s.12 ; s.13 ; s.15

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Withheld pursuant to/removed as

s.13

## RE: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

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From: Brown, Natalie LDB:EX <Natalie.Brown@bcldb.com>  
To: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>, Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Sent: November 15, 2021 9:28:11 PM PST  
Attachments: image002.gif, image001.gif, 2021-11-15\_IN Large Cash Transactions\_draft\_rev 930pm.docx

Hi Erin,

Thanks for sharing the feedback. I've incorporated the edits in the Issues Note, noted my additional edits in tracked changes<sup>s.13</sup>. Thanks for reviewing and advising if there are any further edits required on the Issues Note.

Anita – I'm available tomorrow morning to chat about any questions you may have and help support the IBN. I will be in the office by 8 a.m.

Thanks,

Natalie

### Natalie Brown

Mgr, Comm & Stakeholder Rel., Corporate Strategic Services - Corporate Communications & Stakeh  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-6221 E: [natalie.brown@bcldb.com](mailto:natalie.brown@bcldb.com)

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**Sent:** November 15, 2021 8:51 PM  
**To:** Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>; Brown, Natalie LDB:EX <Natalie.Brown@bcldb.com>  
**Cc:** Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
**Subject:** FW: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS  
**Importance:** High

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I will be on stand-by to review both. Can we please aim to have drafts ready before 10:00am?

Many thanks!

**Erin McEwan**

Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7443 F: 604 252-3283 E: [erin.mcewan@bclddb.com](mailto:erin.mcewan@bclddb.com)

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**Sent:** November 15, 2021 7:54 PM

**To:** McEwan, Erin LDB:EX <[Erin.McEwan@bclddb.com](mailto:Erin.McEwan@bclddb.com)>

**Cc:** Scott, Douglas S FIN:EX <[Douglas.S.Scott@gov.bc.ca](mailto:Douglas.S.Scott@gov.bc.ca)>

**Subject:** 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

Hi Erin,

Comments and suggested edits included in the attached, reviewed by both Doug and I<sup>s.13</sup>

Happy to chat further if any of this doesn't make sense. MO is expecting in the morning, so let me know if you need any help from our crew here in turning it around into an IBN.

Thx.  
K

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Page 21 of 56

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s.12 ; s.13 ; s.15

Page 22 of 56

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s.13

## For Minister Robinson's INFORMATION - 276931 - IBN - LDB Large Cash Transactions

---

From: Di Georgio, Alexis FIN:EX <Alexis.DiGeorgio@gov.bc.ca>  
To: White, Christine FIN:EX <Christine.White@gov.bc.ca>, Lawson, Liam FIN:EX <Liam.Lawson@gov.bc.ca>, Larson, Lori FIN:EX <Lori.Larson@gov.bc.ca>, Ashbourne, Jade FIN:EX <Jade.Ashbourne@gov.bc.ca>, Peters, Eric FIN:EX <Eric.Peters@gov.bc.ca>, Djonlic, Matt FIN:EX <Matt.Djonlic@gov.bc.ca>, Flamank, Brittany FIN:EX <Brittany.Flamank@gov.bc.ca>  
Cc: Kober, Brianne FIN:EX <Brianne.Kober@gov.bc.ca>, Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>, Dhaliwal, Jasneet FIN:EX <Jasneet.Dhaliwal@gov.bc.ca>, Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>, Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>, Leslie, Lisa GCPE:EX <Lisa.Leslie@gov.bc.ca>  
Sent: November 16, 2021 5:11:59 PM PST  
Attachments: 276931 - IBN LDB Large Cash Transactions.pdf

Good afternoon,

Please see attached note for Minister Robinson's information. This note has been approved by DM Doug Scott.

Feel free to reach out if there are any questions or concerns.

Thanks so much,

*Alexis Di Georgio*

Senior Executive Assistant

Deputy Minister's Office | Crown Agencies Secretariat

Ministry of Finance

Work Cell: 250-883-0943

Office: 778-698-9222

**Ministry of Finance**  
**BRIEFING DOCUMENT**

**To:** Honourable Selina Robinson  
Minister of Finance

**Date Requested:** November 16, 2021  
**Date Required:** November 16, 2021

**Initiated by:** R. Blain Lawson  
General Manager and CEO  
LDB

**Date Prepared:** November 16, 2021

**Ministry**  
**Contact:** Anita Mlinar, A/Policy Manager

**Phone Number:** 604-252-7468  
**Email:** anita.mlinar@bcldb.com

**Cliff #:** 276931

---

**TITLE:** Large Cash Transactions at the Liquor Distribution Branch (LDB)

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**PURPOSE:** FOR INFORMATION

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**COMMENTS:**

- s.15; s.17

s.15; s.17

requested real-time alert notification process<sup>1</sup> was not followed during the event. a Deputy Minister-

- s.13; s.15; s.17

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<sup>1</sup> s.15; s.17

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**DATE PREPARED:** November 16, 2021

**TITLE:** Large Cash Transactions

**ISSUE:** Large cash transactions in BCLS during the Premium Spirits Release event.

**BACKGROUND:**

- s.15; s.17
  
  
  
  
  
  
  
  
  
  
- While cash transactions under \$10,000 are currently not tracked or reported within the LDB, the three transactions noted above are currently being reviewed.
- The LDB is not currently a designated reporting entity of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).
- In 2018, the LDB was asked to explore updates to its policy around large cash transactions in BCLS – specifically, to mandate that the LDB report any large cash transactions to FINTRAC.
- The LDB's Information, Privacy and Access (IPA) team and Legal Services Branch indicated at that time there was no clear legal authority for the LDB to lawfully collect and disclose the information FINTRAC requires from designated reporting entities.
- s.12; s.13
  
  
  
  
  
  
  
  
  
  
- In the meantime, the BCLS has continued to follow its existing Large Cash Transactions policy where all cash transactions in excess of \$10,000 (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be counted twice: first, in front of the customer and then, immediately upon completion of the sale, in the cash room.
- The Manager on Duty (MOD) must be present while cash is counted: first in front of the customer and then in the cash room.
- All cash transactions (or a group of sequential transactions from the same customer totaling more than \$10,000 in cash) must be reported in a Store Incident Report (SIR) by the MOD before the end of their shift.
- All SIRs are then reviewed by the LDB's Corporate Loss Prevention (CLP) department, following the process below:

s.15

**DISCUSSION:**

- In advance of the Premium Spirit Release and upcoming holiday season LDB Store Operations sent a reminder memo to all stores on November 12, 2021 with the Large Cash Transactions policy attached.
- LDB Store Operations also contacted the store managers of the top three BCLS locations (Park Royal, 39<sup>th</sup> & Cambie and Brighthouse) to remind them of the policy and an additional internal reporting requirement established for the weekend of the Premium Spirit Release to immediately notify the Executive Director, Corporate Strategic Services, of any large cash transactions during the event.
- On Monday morning it was discovered that the real-time alert notification process was not followed during the event.
  - Store managers explained they were busy with the Premium Spirit Release and assumed that they could update on Monday if they were following the established policy process.
  - Store managers have now been reminded that this is a requirement and understand the sensitivity and urgency.
- The Premium Spirit Release included an online draw for the opportunity to purchase one of four Collectibles all priced over \$10,000. BCLS is advising the winning customers that cash is not accepted as a form of payment for these Collectibles.
- Each winning draw also requires the customer to provide two pieces of identification when purchasing and picking up the product from the 39<sup>th</sup> and Cambie BCLS to ensure that the name matches the draw entry.
- s.13

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## FW: IBN - Cash Transactions

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From: Dahlke, Cindy LDB:EX <Cindy.Dahlke@bcldb.com>  
To: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Cc: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>, Rawji, Alisha LDB:EX <alisha.rawji@bcldb.com>  
Sent: November 17, 2021 9:13:04 AM PST  
Attachments: image001.gif, image002.gif, 2021-11-16 - BIN - MSR - Large Cash Transactions - Final\_Draft.docx

Hi Blain, good morning,

FYI, + should this be copied to EMC? The DM's office Cliff'd this one. Kim responded back to Erin yesterday, "You are both amazing and speedy – thank you!"

Let me/us know. Thank you.

### Cindy Dahlke

Executive Administrative Assistant, Executive Group - General Manager & CEO

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7411 E: [cindy.dahlke@bcldb.com](mailto:cindy.dahlke@bcldb.com)

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---

**From:** McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>

**Sent:** November 16, 2021 3:53 PM

**To:** Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>

**Cc:** Dahlke, Cindy LDB:EX <Cindy.Dahlke@bcldb.com>; Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>; Brown, Natalie LDB:EX <Natalie.Brown@bcldb.com>

**Subject:** RE: IBN - Cash Transactions

Edits accepted. Final attached.

### Erin McEwan

Executive Director, Corporate Strategic Services

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7443 F: 604 252-3283 E: [erin.mcewan@bcldb.com](mailto:erin.mcewan@bcldb.com)

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**Ministry of Finance**  
**BRIEFING DOCUMENT**

**To:** Honourable Selina Robinson  
Minister of Finance

**Date Requested:** November 16, 2021  
**Date Required:** November 16, 2021

**Initiated by:** R. Blain Lawson  
General Manager and CEO  
LDB

**Date Prepared:** November 16, 2021

**Ministry**  
**Contact:** Anita Mlinar, R/Policy Manager

**Phone Number:** 604-252-7468  
**Email:** anita.mlinar@bcldb.com

**Cliff #:** 276931

---

**TITLE:** Large Cash Transactions at the Liquor Distribution Branch (LDB)

---

**PURPOSE:** FOR INFORMATION

---

**COMMENTS:**

- s.15; s.17

s.15; s.17

- s.13; s.15; s.17
- requested real-time alert notification process<sup>1</sup> was not followed during the event. a Deputy Minister-

**DATE PREPARED:** November 16, 2021

**TITLE:** Large Cash Transactions

**ISSUE:** Large cash transactions in BCLS during the Premium Spirits Release event.

**BACKGROUND:**

- s.15; s.17

- While cash transactions under \$10,000 are currently not tracked or reported within the LDB, the three transactions noted above are currently being reviewed.
- The LDB is not currently a designated reporting entity of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC).
- In 2018, the LDB was asked to explore updates to its policy around large cash transactions in BCLS – specifically, to mandate that the LDB report any large cash transactions to FINTRAC.
- The LDB's Information, Privacy and Access (IPA) team and Legal Services Branch (LSB) indicated at that time there was no clear legal authority under which the LDB can lawfully collect and disclose the information FINTRAC requires from designated reporting entities.
- s.12; s.13

- In the meantime, the BCLS has continued to follow its existing Large Cash Transactions policy where all cash transactions in excess of \$10,000 (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be counted twice: first, in front of the customer and then, immediately upon completion of the sale, in the cash room.
- The Manager on Duty (MOD) must be present while cash is counted: first in front of the customer and then in the cash room.
- All cash transactions (or a group of sequential transactions from the same customer totaling more than \$10,000 in cash) must be reported in a Store Incident Report (SIR) by the MOD before the end of their shift.

- All SIRs are then reviewed by the LDB's Corporate Loss Prevention (CLP) department, following the process below:

s.15

#### DISCUSSION:

- In advance of the Premium Spirit Release and upcoming holiday season LDB Store Operations sent a reminder memo to all stores on November 12, 2021 with the Large Cash Transactions policy attached.
- LDB Store Operations also contacted the store managers of the top three BCLS locations (Park Royal, 39<sup>th</sup> & Cambie and Brighthouse) to remind them of the policy and an additional internal reporting requirement established for the weekend of the Premium Spirit Release to immediately notify the Executive Director, Corporate Strategic Services, of any large cash transactions during the event.
- On Monday morning it was discovered that the real-time alert notification process was not followed during the event.
  - Store managers explained they were busy with the Premium Spirit Release and assumed that they could update on Monday if they were following the established policy process of counting currency and completing the SIR.
  - Store managers have now been reminded that this is a requirement and understand the sensitivity and urgency.
- The Premium Spirit Release included an online draw for the opportunity to purchase one of four Collectibles all priced over \$10,000. BCLS is advising the winning customers that cash is not accepted as a form of payment for these Collectibles.
- Each winning draw also requires the customer to provide two pieces of identification when purchasing and picking up the product from the 39<sup>th</sup> and Cambie BCLS to ensure that the name matches the draw entry.

s.13

s.13

## **FOR REVIEW: Urgent interim policy directive - Large Cash Transactions**

---

From: Bilney, Kate LDB:EX <kate.bilney@bcldb.com>  
To: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Cc: Jones, Candace LDB:EX <Candace.Jones@bcldb.com>, McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
Sent: November 17, 2021 3:56:27 PM PST  
Attachments: image003.png, image004.jpg, Policy Directive 20-03 - Large Cash Transactions - DRAFT.docx

Hi Blain,

Please see attached a draft policy directive regarding Large Cash Transactions, and the accompanying memos for BCLS employees and hospitality customers for your review.

Please let me know if you have any edits.

Thanks,

Kate

---

### **1. Memo to BCLS employees**

The following message is sent on behalf of GM & CEO, Blain Lawson.

Good afternoon,

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only. This applies to both retail customers and hospitality customers. To ensure hospitality customers are informed, please print and distribute the attached memo to the hospitality customers that your store services.

This directive is applied as an interim measure until the LDB can review its current Large Cash Transactions policy.

Please see the attached policy directive for further information.

Kind regards,

Blain

---

### **2. Memo to hospitality customers**

To: Hospitality customers  
From: BC Liquor Distribution Branch  
Re: Interim Policy for Large Cash Transactions at BCLS

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only. This applies to both retail customers and hospitality customers.

Any changes to this interim policy will be communicated to hospitality customers.

We thank you for your understanding and cooperation.

Kind regards,

BC Liquor Distribution Branch

**Kate Bilney**

Manager, Corporate Social Impact, Corporate Communications and Stakeholder Relations – Corporate Strategic Services

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7449 E: [kate.bilney@bclddb.com](mailto:kate.bilney@bclddb.com)

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---

**Date:** November 17, 2021

**Re:** Large Cash Transactions at BCLS

---

## **1. Large Cash Transactions**

### **Current Policy**

If an employee believes that a Large Cash Transaction (any transaction where all or part of the tender is cash in excess of \$10,000 Canadian [or equivalent]) is suspicious, they should follow the procedures set out in the "Suspicious Transactions" policy.

### **New Policy**

Effective immediately, BCLS will no longer accept any cash transactions over five thousand dollars Canadian. This applies to both retail customers and hospitality customers. For transactions over five thousand dollars, BCLS will only accept credit card or debit card.

Please note, if a customer asks for their purchases to be divided into multiple transactions but the total cash received for their transactions exceeds five thousand dollars Canadian (or equivalent), this group of transactions is collectively a Large Cash Transaction and this policy still applies.

This policy directive is prepared as an interim measure until the LDB can review its current Large Cash Transactions policy.

**This temporary policy directive is effective immediately.**

If you have any questions regarding this policy directive, please contact Jonathan Castaneto, Director, Retail Operations, at [Jonathan.castaneto@bclddb.com](mailto:Jonathan.castaneto@bclddb.com).

## **Deputy Minister Memo - LDB - Large Cash Transactions**

---

From: Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>  
To: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Sent: November 17, 2021 5:19:42 PM PST  
Attachments: 276931 - Memo -LDB Large Cash Transactions.pdf

Good evening,

Please see attached memo, signed by DM Douglas Scott.

Thank you.



Ministry of  
Finance

Office of the  
Deputy Minister  
Crown Agencies  
Secretariat

## MEMORANDUM

To: Blain Lawson  
General Manager and CEO, BC Liquor Distribution

Date: 2021-11-17  
Cliff # 276931

Re: **Large cash transactions at the Liquor Distribution Branch (LDB)**

As you know, disrupting financial crime and protecting the integrity and security of British Columbia's economy is a key priority for government. Over the past weekend, I was advised of several large cash transactions (in excess of \$10,000) that occurred during the 2021 Premium Spirits Release at BC Liquor Stores (BCLS), which is a significant concern. I am also aware of the significant impact recent adverse weather conditions across the province have had on LDB operations and recognize that the LDB must also allocate resources within the organization to respond to this situation urgently in line with the provincial state of emergency announced earlier today.

In response to these concerns regarding cash transactions and in recognition of the need to prioritize the response to recent weather events, I am directing the LDB to do the following:

1. s.13
2. Effective immediately and throughout the review (noted above), the LDB will not accept cash transactions above \$5,000.

The Crown Agencies Secretariat looks forward to working in partnership with the LDB in the review of current processes and development of an action plan to prevent potential money laundering activities and minimize losses at BCLS and BC Cannabis Stores. I appreciate your ongoing diligence and attention to this matter.

Thank you,

Douglas S. Scott  
Deputy Minister  
Crown Agencies Secretariat

## **Urgent interim policy directive - Large Cash Transactions**

---

From: LDB Store Ops Admin LDB:EX s.17  
To: LDB Store Ops Admin LDB:EX LDB D SO  
All Store Managers<sup>s.17</sup> LDB D SO Assistant  
Managers<sup>s.17</sup> LDB D SO All Stores  
s.17  
Cc: LDB D IT Retail Liquor Support Team<sup>s.17</sup>, LDB  
D SO Regional Managers<sup>s.17</sup>  
Sent: November 18, 2021 8:48:46 AM PST  
Attachments: Memo to hospitality customers - Interim Policy for Large Cash Transactions at  
BCLS.pdf, Policy Directive 20-03 - Large Cash Transactions\_For review.pdf

**The following message is sent on behalf of the General Manager & CEO, Blain Lawson:**

Good afternoon,

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This applies to both retail customers and hospitality customers. To ensure hospitality customers are informed, please print and distribute the attached *Memo to hospitality customers – Interim Policy for Large Cash Transactions at BCLS* to hospitality customers that your store services.

This directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached *Policy Directive 20-03 – Large Cash Transactions For review* for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer



## **LIQUOR DISTRIBUTION BRANCH**

**Date:** November 17, 2021  
**To:** Hospitality Customers  
**From:** BC Liquor Distribution Branch  
**Subject:** Interim Policy for Large Cash Transactions at BCLS

---

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only. This applies to both retail customers and hospitality customers.

Any changes to this interim policy will be communicated to hospitality customers.

We thank you for your understanding and cooperation.

Kind regards,

BC Liquor Distribution Branch



Date: November 17, 2021

Re: **Large Cash Transactions at BCLS**

---

## **1. Large Cash Transactions**

### **Current Policy**

If an employee believes that a Large Cash Transaction (any transaction where all or part of the tender is cash in excess of \$10,000 Canadian [or equivalent]) is suspicious, they should follow the procedures set out in the "Suspicious Transactions" policy.

### **New Policy**

Effective immediately, BCLS will no longer accept any cash transactions over **five thousand dollars (\$5,000)** Canadian. This applies to both retail customers and hospitality customers. For transactions over **\$5,000**, BCLS will only accept credit card or debit card.

Please note, if a customer asks for their purchases to be divided into multiple transactions but the total cash received for their transactions exceeds five thousand dollars Canadian (or equivalent), this group of transactions is collectively a Large Cash Transaction and this policy still applies.

This policy directive is prepared as an interim measure until the LDB can review its current Large Cash Transactions policy.

**This temporary policy directive is effective immediately.**

If you have any questions regarding this policy directive, please contact Jonathan Castaneto, Director, Retail Operations, at [Jonathan.castaneto@bclddb.com](mailto:Jonathan.castaneto@bclddb.com).

## RE: Urgent interim P-D

---

From: Jones, Candace LDB:EX <Candace.Jones@bcldb.com>  
To: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>, Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Cc: Bilney, Kate LDB:EX <kate.bilney@bcldb.com>, Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>  
Sent: November 18, 2021 2:07:47 PM PST  
Attachments: image001.gif, image002.gif, Policy Directive 21-01 - Large Cash Transactions at BCCS.docx

Hi Blain / Erin,

Any updates or edits to the attached/below before we send over to the cannabis team?

Thanks

---

**The following message is sent on behalf of the General Manager & CEO, Blain Lawson:**

Good afternoon,

Please be advised that, effective immediately, BC Cannabis Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This policy directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached [Policy Directive 21-01 – Large Cash Transactions at BCCS](#) for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer

### **Candace Jones**

Dir Corp Comm/Stakeholder Relations, Corporate Strategic Services  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7460 E: [candace.jones@bcldb.com](mailto:candace.jones@bcldb.com)

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r immediately and delete the message including any attachments.



---

Date: November 18, 2021

Re: **Large Cash Transactions at BC Cannabis Stores (BCCS)**

---

## **1. Large Cash Transactions**

### **Current Policy**

If an employee believes that a large cash transaction (any transaction where all or part of the tender is cash in excess of ten thousand dollars **(\$10,000)** Canadian [or equivalent]) is suspicious, they should follow the procedures set out in the "Suspicious Transactions" policy.

### **New Policy**

Effective immediately, BCCS brick and mortar locations will no longer accept any cash transactions over five thousand dollars **(\$5,000)** Canadian. This applies to all retail customers. For transactions over \$5,000, BCCS will only accept credit card or debit card.

Please note, if a customer asks for their purchases to be divided into multiple transactions but the total cash received for their transactions exceeds \$5000 Canadian [or equivalent], this group of transactions is considered a large cash transaction and this policy directive still applies.

This policy directive is prepared as an interim measure until the LDB can review its current Large Cash Transactions policy.

**This temporary policy directive is effective immediately.**

If you have any questions regarding this policy directive, please contact Kevin Satterfield, Director, Cannabis Store Operations at [Kevin.Satterfield@bcldb.com](mailto:Kevin.Satterfield@bcldb.com).



## media request - ban on \$5,000 cash transactions

---

From: Bob Mackin <bob@thebreaker.news>  
To: jonathan.castaneto@bclddb.com, blain.lawson@bclddb.com, Castaneto, Jonathan LDB:EX <Jonathan.Castaneto@bclddb.com>, Lawson, R. Blain LDB:EX <Blain.Lawson@bclddb.com>  
Sent: November 19, 2021 8:21:00 AM PST

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Hello,  
I hope this finds you well. I am aware of a Nov. 17 BCLDB memo immediately banning cash transactions of \$5,000, until BCLDB can review its large cash transactions policy.  
I am hoping you might be available for an interview, to explain what triggered this sudden decision. For instance, is this memo related to the Nov. 13 Premium Spirit Release promotion?  
Sincerely,  
Bob Mackin  
reporter, theBreaker.news  
604-982-9130

--

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## BCCS Communication: Urgent Interim Policy Measures Regarding Large Cash Transactions

---

From: LDB Store Ops Cannabis Admin LDB:EX<sup>s.17</sup>  
To: LDB D SO Cannabis Store Managers<sup>s.17</sup>  
LDB D SO Cannabis Assistant Managers<sup>s.17</sup> LDB D SO Cannabis All Stores  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>, Corah, Gayle LDB:EX <gayle.corah@bcldb.com>, Muzzillo, Tyson LDB:EX <tyson.muzzillo@bcldb.com>, Martin, Jamie LDB:EX <jamie.martin@bcldb.com>, Satterfield, Kevin LDB:EX <kevin.satterfield@bcldb.com>  
Sent: November 19, 2021 1:02:16 PM PST  
Attachments: Memo - Policy Directive 21-01 - Large Cash Transactions at BCCS.pdf, image001.gif, image002.png

BCCS Teams,

**The following message is sent on behalf of the General Manager & CEO, Blain Lawson:**

Good afternoon,

Please be advised that, effective immediately, BC Cannabis Stores (BCCS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This policy directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached [Policy Directive 21-01 – Large Cash Transactions at BCCS](#) for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer

### Store Operations - Cannabis Operations

BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
E: s.17

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Date: November 18, 2021

Re: **Large Cash Transactions at BC Cannabis Stores (BCCS)**

---

## **1. Large Cash Transactions**

### **Current Policy**

If an employee believes that a large cash transaction (any transaction where all or part of the tender is cash in excess of ten thousand dollars **(\$10,000)** Canadian [or equivalent]) is suspicious, they should follow the procedures set out in the "Suspicious Transactions" policy.

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Please note, if a customer asks for their purchases to be divided into multiple transactions but the total cash received for their transactions exceeds \$5000 Canadian [or equivalent], this group of transactions is considered a large cash transaction and this policy directive still applies.

This policy directive is prepared as an interim measure until the LDB can review its current Large Cash Transactions policy.

**This temporary policy directive is effective immediately.**

If you have any questions regarding this policy directive, please contact Kevin Satterfield, Director, Cannabis Store Operations at [Kevin.Satterfield@bclddb.com](mailto:Kevin.Satterfield@bclddb.com).

From: LDB Store Ops Cannabis Admin LDB:EX

Sent: November 19, 2021 1:02 PM

To: LDB D SO Cannabis Store Managers; LDB D SO Cannabis Assistant Managers; LDB D SO Cannabis All Stores

Cc: Lawson, R. Blain LDB:EX; Corah, Gayle LDB:EX; Muzzillo, Tyson LDB:EX; Martin, Jamie LDB:EX; Satterfield, Kevin LDB:EX

Subject: BCCS Communication: Urgent Interim Policy Measures Regarding Large Cash Transactions

Attachments: Memo - Policy Directive 21-01 - Large Cash Transactions at BCCS.pdf

Importance: High

BCCS Teams,

The following message is sent on behalf of the General Manager & CEO, Blain Lawson:

Good afternoon,

Please be advised that, effective immediately, BC Cannabis Stores (BCCS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This policy directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached Policy Directive 21-01 – Large Cash Transactions at BCCS for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer

Store Operations - Cannabis Operations

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

E: cannabisstoreops@bcladb.com <mailto:cannabisstoreops@bcladb.com>

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From: Bob Mackin <bob@thebreaker.news>

Sent: November 19, 2021 8:21 AM

To: Castaneto, Jonathan LDB:EX; Lawson, R. Blain LDB:EX

Subject: media request - ban on \$5,000 cash transactions

[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.

Hello,

I hope this finds you well. I am aware of a Nov. 17 BCLDB memo immediately banning cash transactions of \$5,000, until BCLDB can review its large cash transactions policy.

I am hoping you might be available for an interview, to explain what triggered this sudden decision. For instance, is this memo related to the Nov. 13 Premium Spirit Release promotion <<http://www.bcliquorstores.com/promotion/2021-premium-spirit-release>> ?

Sincerely,

Bob Mackin  
reporter, theBreaker.news  
604-982-9130

--

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Listen to the Podcast <<http://thebreaker.news/?s=podcast>> on TuneIn <<https://tunein.com/podcasts/News--Politics-Podcasts/theBreakernews-Podcast-p1065476/>> , Apple Podcasts <<https://podcasts.apple.com/us/podcast/thebreaker-news-podcast/id1362852547>> and Spotify <<https://open.spotify.com/show/2AEb4uLEXpMZTdHuEzysr>>

Subscribe to the newsletter <<https://news.us14.list-manage.com/subscribe?u=47e0658ca6a215f1afa9eb98a&id=3aaa8b9434>>

From: Jones, Candace LDB:EX  
Sent: November 18, 2021 2:08 PM  
To: McEwan, Erin LDB:EX; Lawson, R. Blain LDB:EX  
Cc: Bilney, Kate LDB:EX; Mlinar, Anita LDB:EX  
Subject: RE: Urgent interim P-D  
Attachments: Policy Directive 21-01 - Large Cash Transactions at BCCS.docx

Hi Blain / Erin,

Any updates or edits to the attached/below before we send over to the cannabis team?

Thanks

The following message is sent on behalf of the General Manager & CEO, Blain Lawson:

Good afternoon,

Please be advised that, effective immediately, BC Cannabis Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This policy directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached Policy Directive 21-01 – Large Cash Transactions at BCCS for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer

Candace Jones  
Dir Corp Comm/Stakeholder Relations, Corporate Strategic Services  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7460 E: candace.jones@bclddb.com

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r immediately and delete the message including any attachments.

From: LDB Store Ops Admin LDB:EX  
Sent: November 18, 2021 8:49 AM  
To: LDB Store Ops Admin LDB:EX; LDB D SO All Store Managers; LDB D SO Assistant Managers; LDB D SO All Stores  
Cc: LDB D IT Retail Liquor Support Team; LDB D SO Regional Managers  
Subject: Urgent interim policy directive - Large Cash Transactions  
Attachments: Memo to hospitality customers - Interim Policy for Large Cash Transactions at BCLS.pdf; Policy Directive 20-03 - Large Cash Transactions\_For review.pdf

The following message is sent on behalf of the General Manager & CEO, Blain Lawson:

Good afternoon,

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only.

This applies to both retail customers and hospitality customers. To ensure hospitality customers are informed, please print and distribute the attached Memo to hospitality customers – Interim Policy for Large Cash Transactions at BCLS to hospitality customers that your store services.

This directive is applied as an interim measure until the Liquor Distribution Branch (LDB) can review its current Large Cash Transactions policy.

Please see the attached Policy Directive 20-03 – Large Cash Transactions\_For review for further information.

Kind regards,

Blain Lawson, General Manager & Chief Executive Officer

From: Di Georgio, Alexis FIN:EX on behalf of Scott, Douglas S FIN:EX  
Sent: November 17, 2021 5:20 PM  
To: Lawson, R. Blain LDB:EX  
Subject: Deputy Minister Memo - LDB - Large Cash Transactions  
Attachments: 276931 - Memo -LDB Large Cash Transactions.pdf

Good evening,

Please see attached memo, signed by DM Douglas Scott.

Thank you.

From: Bilney, Kate LDB:EX  
Sent: November 17, 2021 3:56 PM  
To: Lawson, R. Blain LDB:EX  
Cc: Jones, Candace LDB:EX; McEwan, Erin LDB:EX  
Subject: FOR REVIEW: Urgent interim policy directive - Large Cash Transactions  
Attachments: Policy Directive 20-03 - Large Cash Transactions - DRAFT.docx

Hi Blain,

Please see attached a draft policy directive regarding Large Cash Transactions, and the accompanying memos for BCLS employees and hospitality customers for your review.

Please let me know if you have any edits.

Thanks,

Kate

#### 1. Memo to BCLS employees

The following message is sent on behalf of GM & CEO, Blain Lawson.

Good afternoon,

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only. This applies to both retail customers and hospitality customers. To ensure hospitality customers are informed, please print and distribute the attached memo to the hospitality customers that your store services.

This directive is applied as an interim measure until the LDB can review its current Large Cash Transactions policy.

Please see the attached policy directive for further information.

Kind regards,

Blain

#### 2. Memo to hospitality customers

To: Hospitality customers

From: BC Liquor Distribution Branch

Re: Interim Policy for Large Cash Transactions at BCLS

Please be advised that, effective immediately, BC Liquor Stores (BCLS) will no longer accept any cash transactions over five thousand dollars (\$5,000). Transactions over \$5,000 must be made using credit or debit card only. This applies to both retail customers and hospitality customers.

Any changes to this interim policy will be communicated to hospitality customers.

We thank you for your understanding and cooperation.

Kind regards,

BC Liquor Distribution Branch

Kate Bilney

Manager, Corporate Social Impact, Corporate Communications and Stakeholder Relations – Corporate Strategic Services

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7449 E: kate.bilney@bcldb.com <mailto:kate.bilney@bcldb.com>

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From: Dahlke, Cindy LDB:EX

Sent: November 17, 2021 9:13 AM

To: Lawson, R. Blain LDB:EX

Cc: McEwan, Erin LDB:EX; Rawji, Alisha LDB:EX

Subject: FW: IBN - Cash Transactions

Attachments: 2021-11-16 - BIN - MSR - Large Cash Transactions - Final\_Draft.docx

Hi Blain, good morning,

FYI, + should this be copied to EMC? The DM's office Cliff'd this one. Kim responded back to Erin yesterday, "You are both amazing and speedy – thank you!"

Let me/us know. Thank you.

Cindy Dahlke

Executive Administrative Assistant, Executive Group - General Manager & CEO

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7411 E: cindy.dahlke@bcldb.com

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From: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
Sent: November 16, 2021 3:53 PM  
To: Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>  
Cc: Dahlke, Cindy LDB:EX <Cindy.Dahlke@bcldb.com>; Mlinar, Anita LDB:EX <anita.mlinar@bcldb.com>; Brown, Natalie LDB:EX <Natalie.Brown@bcldb.com>  
Subject: RE: IBN - Cash Transactions

Edits accepted. Final attached.

Erin McEwan  
Executive Director, Corporate Strategic Services  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7443 F: 604 252-3283 E: erin.mcewan@bcldb.com <mailto:erin.mcewan@bcldb.com>

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From: Di Georgio, Alexis FIN:EX  
Sent: November 16, 2021 5:12 PM  
To: White, Christine FIN:EX; Lawson, Liam FIN:EX; Larson, Lori FIN:EX; Ashbourne, Jade FIN:EX; Peters, Eric FIN:EX; Djonlic, Matt FIN:EX; Flamank, Brittany FIN:EX  
Cc: Kober, Brianne FIN:EX; Horn, Kim FIN:EX; Dhaliwal, Jasneet FIN:EX; Lawson, R. Blain LDB:EX; Mlinar, Anita LDB:EX; Leslie, Lisa GCPE:EX  
Subject: For Minister Robinson's INFORMATION - 276931 - IBN - LDB Large Cash Transactions  
Attachments: 276931 - IBN LDB Large Cash Transactions.pdf

Good afternoon,

Please see attached note for Minister Robinson's information. This note has been approved by DM Doug Scott.

Feel free to reach out if there are any questions or concerns.

Thanks so much,

Alexis Di Georgio

Senior Executive Assistant

Deputy Minister's Office | Crown Agencies Secretariat  
Ministry of Finance

Work Cell: 250-883-0943

Office: 778-698-9222

From: Brown, Natalie LDB:EX  
Sent: November 15, 2021 9:28 PM  
To: McEwan, Erin LDB:EX; Mlinar, Anita LDB:EX  
Cc: Lawson, R. Blain LDB:EX  
Subject: RE: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS  
Attachments: 2021-11-15\_IN Large Cash Transactions\_draft\_rev 930pm.docx

Hi Erin,

Thanks for sharing the feedback. I've incorporated the edits in the Issues Note, noted my additional edits in tracked changes and<sup>5.13</sup>  
advising if there are any further edits required on the Issues Note.

Thanks for reviewing and

Anita – I'm available tomorrow morning to chat about any questions you may have and help support the IBN. I will be in the office by 8 a.m.

Thanks,

Natalie

Natalie Brown  
Mgr, Comm & Stakeholder Rel., Corporate Strategic Services - Corporate Communications & Stakeh  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-6221 E: natalie.brown@bclddb.com

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From: McEwan, Erin LDB:EX <Erin.McEwan@bclddb.com>  
Sent: November 15, 2021 8:51 PM  
To: Mlinar, Anita LDB:EX <anita.mlinar@bclddb.com>; Brown, Natalie LDB:EX <Natalie.Brown@bclddb.com>  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bclddb.com>  
Subject: FW: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS  
Importance: High

Hi Both,

Doug asked for an "IN" this morning and what he meant was a IBN.

Anita, Given this can you please work with Natalie and transfer the attached IN it to a IBN template. DMO has made comments in the attached and I have edited where appropriate or made comments for direction. Also, please work in

the below highlighted section of info from Kim's email into the IBN.

Natalie, can you pls update the IN per comments/recommended edits as this will likely be asked for by GCPE.

This needs to be our highest priority in the morning as the MO is expecting it.

I will be on stand-by to review both. Can we please aim to have drafts ready before 10:00am?

Many thanks!

Erin McEwan

Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service

BC Liquor Distribution Branch

3383 Gilmore Way, Burnaby BC V5G 4S1

T: 604 252-7443 F: 604 252-3283 E: erin.mcewan@bcldb.com <mailto:erin.mcewan@bcldb.com>

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From: Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca <mailto:Kim.Horn@gov.bc.ca> >

Sent: November 15, 2021 7:54 PM

To: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com <mailto:Erin.McEwan@bcldb.com> >

Cc: Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca <mailto:Douglas.S.Scott@gov.bc.ca> >

Subject: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

Hi Erin,

Comments and suggested edits included in the attached, reviewed by both Doug and I.<sup>s.13</sup>  
s.13

Happy to chat further if any of this doesn't make sense. MO is expecting in the morning, so let me know if you need any help from our crew here in turning it around into an IBN.

Thx.

K

From: McEwan, Erin LDB:EX

Sent: November 15, 2021 8:51 PM

To: Mlinar, Anita LDB:EX; Brown, Natalie LDB:EX

Cc: Lawson, R. Blain LDB:EX

Subject: FW: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

Attachments: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS.docx; Re: Issues Note

Importance: High

Hi Both,

Doug asked for an "IN" this morning and what he meant was a IBN.

Anita, Given this can you please work with Natalie and transfer the attached IN it to a IBN template. DMO has made comments in the attached and I have edited where appropriate or made comments for direction. Also, please work in the below highlighted section of info from Kim's email into the IBN.

Natalie, can you pls update the IN per comments/recommended edits as this will likely be asked for by GCPE.

This needs to be our highest priority in the morning as the MO is expecting it.

I will be on stand-by to review both. Can we please aim to have drafts ready before 10:00am?

Many thanks!

Erin McEwan  
Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7443 F: 604 252-3283 E: erin.mcewan@bclddb.com

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From: Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>  
Sent: November 15, 2021 7:54 PM  
To: McEwan, Erin LDB:EX <Erin.McEwan@bclddb.com>  
Cc: Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>  
Subject: 2021-11-15\_IN Large Cash Transactions\_draft\_rev\_EKM\_KHDS

Hi Erin,

Comments and suggested edits included in the attached, reviewed by both Doug and I.<sup>s.13</sup>

s.13

Happy to chat further if any of this doesn't make sense. MO is expecting in the morning, so let me know if you need any help from our crew here in turning it around into an IBN.

Thx.

K

From: Scott, Douglas S FIN:EX  
Sent: November 15, 2021 7:44 PM  
To: McEwan, Erin LDB:EX; Horn, Kim FIN:EX  
Cc: Lawson, R. Blain LDB:EX  
Subject: Re: Issues Note

Hi Erin,

Thanks I have reviewed - I have provided my comments to Kim and agree with her comments.

I am sorry - I did say IN which was in error. I was thinking IBN - which is the appropriate not... my error. It should be in IBN format.

Doug

Get Outlook for iOS <<https://aka.ms/o0ukef>>

---

From: McEwan, Erin LDB:EX <Erin.McEwan@bcldb.com>  
Sent: Monday, November 15, 2021 6:22:39 PM  
To: Scott, Douglas S FIN:EX <Douglas.S.Scott@gov.bc.ca>; Horn, Kim FIN:EX <Kim.Horn@gov.bc.ca>  
Cc: Lawson, R. Blain LDB:EX <Blain.Lawson@bcldb.com>  
Subject: Issues Note

Hi Both,

Attached is the Issues Note related to large cash transactions.

Doug, I understood this morning that you were looking for an "IN" and interpreted that request to mean an Issues Note. Please let me know if you want me to convert it to a Information Note in the morning.

The Policy team is working on a BN regarding options for policy changes.

Let me know if you have questions or need more information.

Erin McEwan  
Executive Director, Corporate Strategic Services - Exec. Director, Corporate Service  
BC Liquor Distribution Branch  
3383 Gilmore Way, Burnaby BC V5G 4S1  
T: 604 252-7443 F: 604 252-3283 E: [erin.mcewan@bcldb.com](mailto:erin.mcewan@bcldb.com) <<mailto:erin.mcewan@bcldb.com>>

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From: LDB Store Ops Admin LDB:EX

Sent: November 12, 2021 2:12 PM

To: LDB Store Ops Admin LDB:EX; LDB D SO All Store Managers; LDB D SO All Stores; LDB D SO Assistant Managers

Cc: LDB D SO Regional Managers; LDB D IT Retail Liquor Support Team; Alexander, Brendan LDB:EX; Cheema, Aman LDB:EX

Subject: Reminder: SIRs required for Cash Transactions in excess of \$10K

Attachments: Large Cash Transactions (Liquor).docx

The below message is sent on behalf of Store Operations:

With the upcoming Spirit Release and holiday season, stores may encounter large cash transactions.

Please be reminded that, as per the "Large Cash transactions" policy (attached), all cash transactions in excess of \$10,000 (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be counted twice: First, in front of the customer and then, immediately upon completion of the sale, in the Cash Room.

The Manager on Duty (MOD) must be present while cash is counted: first in front of the customer and then in the Cash Room.

All cash transactions (or a group of sequential transactions from the same customer totaling in excess of \$10,000 in cash) must be reported in a Store Incident Report (SIR) by the MOD before the end of their shift.

Thank you for your continued assistance,

Store Operations