

From: [Stewart, Robert A GPEB:EX](#)  
To: [Samson, Heather GPEB:EX](#); [Stenerson, Laurin P GPEB:EX](#)  
Cc: [Fiddler, Jim GPEB:EX](#); [Akin, Richard GPEB:EX](#)  
Subject: Notify FINTRAC  
Date: Wednesday, January 24, 2018 2:46:57 PM

---

s.13,s.22

Thanks

Bob Stewart

Senior Regional Director

Compliance Division, Lower Mainland

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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From: Samson, Heather FIN:EX  
To: Akin, Richard FIN:EX  
Subject: REDACTED ROF  
Date: Monday, January 15, 2018 1:34:36 PM  
Attachments: s.15,s.22

---

Hi Rich,

I've attached the s.13,s.22 It's also saved to the N Drive. It will need to be PDF's in order for the redaction boxes to be un-editable. Please give it a read and see if it still flows/makes sense.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

Heather.Samson@gov.bc.ca

**From:** [Stewart, Robert A GPEB:EX](#)  
**To:** [Baillie, Garth E GPEB:EX](#)  
**Subject:** RE: Appeal  
**Date:** Wednesday, January 3, 2018 1:30:00 PM

---

OK, thanks

Bob Stewart

Senior Regional Director  
Compliance Division, Lower Mainland  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Wednesday, January 3, 2018 1:22 PM  
**To:** Stewart, Robert A FIN:EX  
**Subject:** RE: Appeal

Yes the ED got a request from a Law firm between Christmas and New Year's apparently. I have not seen it.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Wednesday, January 3, 2018 12:55 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** Appeal

Hi Garth,

Happy New Year.

Was there any word of an appeal on the s.2 file?

Bob Stewart

Senior Regional Director  
Compliance Division, Lower Mainland  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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From: Baillie, Garth E FIN:EX  
To: Jomha, Robin FIN:EX  
Subject: S.22  
Date: Tuesday, December 19, 2017 1:55:00 PM  
Attachments: s.15,s.22

---

*Garth Baillie*

Director, Deputy Registrar

Personnel Registration

Gaming Policy and Enforcement Branch

Direct phone (250) 356-0983

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From: [Stenerson, Laurin P GPEB:EX](#)  
To: [Samson, Heather GPEB:EX](#)  
Subject: FW: s.22  
Date: Tuesday, December 12, 2017 11:38:00 AM

---

Did I ever send you this?

---

From: Craig Longley [mailto:CLongley@bclc.com]  
Sent: Thursday, July 13, 2017 8:40 AM  
To: Stenerson, Laurin P FIN:EX  
Subject: s.22

Laurin,

As per our discussion this morning, I've completed my investigation of this incident.

Most of the findings were as expected. There was one interesting comment made by Director, VIP Guest Services s.22..... stated s. had to translate (written) for s. in regards to the cheque s. was writing to the valet. s. had to translate the number 2000 to English for the cheque.

Regards,

Craig Longley

Investigator

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver B.C. V5M 0A6

T 604 225 6430 (s.17

● *Yes, and...* ●

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

---

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**From:** [Akin, Richard FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** FW: GPEB Investigation s.15  
**Date:** Friday, December 8, 2017 1:39:00 PM  
**Attachments:** [BCLC Letter 2017-12-08.doc](#)

---

Hi Heather,  
You can include this letter into your file.  
Thanks,  
Richard

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Friday, December 8, 2017 1:38 PM  
**To:** 'JKarlovec@bclc.com'  
**Cc:** 'Daryl Tottenham'; Fitzgerald, Anna FIN:EX  
**Subject:** GPEB Investigation s.15

Hello John,

We are required under the GCA to advise BCLC of the results of an investigation if the request originated from BCLC. Please find attached a letter providing brief details of the investigation that resulted in cancelling the s.15,s.22

s.15,s.22                      This decision carries a thirty day appeal period that the individual is free to apply for.

If you would like to discuss further please do not hesitate to call.

Bob Stewart

Senior Regional Director

Compliance Division, Lower Mainland

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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From: [Stewart, Robert A GPEB:EX](#)  
To: [Akin, Richard GPEB:EX](#)  
Date: Thursday, December 7, 2017 9:47:00 AM  
Attachments: [BCLC Letter 2017-12-06.doc](#)

---

Have a look and let me know if this works for you

Bob Stewart

Senior Regional Director

Compliance Division, Lower Mainland

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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**From:** Pandachuck, Niki FIN:EX  
**To:** Baillie, Garth E FIN:EX  
**Subject:** RE: For review: GPEB - s.22 - IN - 6DEC17 - DRAFT.docx (NP)  
**Date:** Thursday, December 7, 2017 8:18:39 AM  
**Attachments:** GPEB - s.22 IN - 6DEC17 - DRAFT.docx (NP) (3).docx

---

Hi Garth, please see the updated draft and flag any further concerns. To your point, s.13  
s.13

---

**From:** Pandachuck, Niki FIN:EX  
**Sent:** Thursday, December 7, 2017 8:14 AM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** RE: For review: GPEB - s.22 - IN - 6DEC17 - DRAFT.docx (NP)  
Yes, I see your point. It's a good one. I'm going to make edits to remove those elements and will send it back to you.

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Thursday, December 7, 2017 7:45 AM  
**To:** Pandachuck, Niki FIN:EX  
**Subject:** RE: For review: GPEB - s.22 - IN - 6DEC17 - DRAFT.docx (NP)

That is fine however this issue note appears that s.13  
s.13

This should only deal  
with the information that GEPB used to make this decision and s.13  
s.13 That is just my thoughts. We can speak when you  
arrive in the office.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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---

**From:** Pandachuck, Niki FIN:EX  
**Sent:** Thursday, December 7, 2017 7:36 AM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** Re: For review: GPEB - s.22 - IN - 6DEC17 - DRAFT.docx (NP)

Thanks Garth.

The Minister and GCPE want to be prepared should they get asked about this by the media, due to the s.22

There's another gaming announcement tomorrow so the spotlight is going to remain on the industry for the next week or so at least.

Niki

Sent from my iPhone

On Dec 7, 2017, at 12:51 AM, Baillie, Garth E FIN:EX <Garth.Baillie@gov.bc.ca> wrote:

Hi Niki. I will talk to Kim in a few hours but I have great concerns with all of this.

Sent from my iPhone

On Dec 6, 2017, at 4:46 PM, Pandachuck, Niki FIN:EX <Niki.Pandachuck@gov.bc.ca> wrote:

Hi Garth,

Can you please review the background of the attached issues note, written by GCPE, for accuracy? Kim is reviewing the 'suggested response' section but is unable to review the background due to her role as final decision maker, should the worker submit a request for written response.

Thank you,

Niki

**Niki Pandachuck** · Communications Officer

Gaming Policy & Enforcement Branch

Ministry of Attorney General

P: 250 387-1151 /s.17

From: [Wong, Semmy GPEB:EX](#)  
To: [Stewart, Robert A GPEB:EX](#)  
Subject: Letter 2017-12-06.doc  
Date: Wednesday, December 6, 2017 3:57:42 PM  
Attachments: [Letter 2017-12-06.doc](#)

---

Bob,  
Please see attached.

**Semmy Wong**

Administrative Assistant  
Intelligence Unit - Compliance Division  
Gaming Policy and Enforcement Branch  
T: (604) 660-5010

***Know your limit, play within it.***

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From: [Stewart, Robert A GPEB:EX](#)  
To: [Wong, Semmy GPEB:EX](#)  
Subject: Letter to BCLC 17-97791  
Date: Wednesday, December 6, 2017 3:08:10 PM  
Attachments: [Letter to BCLC 17-97791.docx](#)

---

Bob Stewart  
Senior Regional Director  
Compliance Division, Lower Mainland  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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**From:** [Stewart, Robert A GPEB:EX](#)  
**To:** [Fitzgerald, Anna GPEB:EX](#)  
**Subject:** FW: Investigation and Termination of Registration  
**Date:** Wednesday, December 6, 2017 2:50:00 PM

---

Here you go Anna, let us know if you need any more information.

Bob Stewart

Senior Regional Director

Compliance Division, Lower Mainland

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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---

**From:** Akin, Richard FIN:EX  
**Sent:** Wednesday, December 6, 2017 2:23 PM  
**To:** Stewart, Robert A FIN:EX  
**Subject:** RE: Investigation and Termination of Registration  
Here is our suggested bullet points  
s.13,s.15,s.22



s.13,s.15,s.22

---

**From:** Fitzgerald, Anna FIN:EX  
**Sent:** Tuesday, December 5, 2017 8:04 AM  
**To:** Stewart, Robert A FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** Fwd: Investigation and Termination of Registration

Hello Bob

Could I request that you and your team put together a few bullet points to the s.22 along the lines of,,, along

s.13,s.22

s.13

Could I please ask this letter is drafted by Monday next week and the bullets completed in the next couple of days.

Thank you,

Anna

Sent from my iPad

Begin forwarded message:

**From:** "Skrine, Cary J FIN:EX" <[Cary.Skrine@gov.bc.ca](mailto:Cary.Skrine@gov.bc.ca)>  
**Date:** December 1, 2017 at 7:54:28 PM PST  
**To:** "Mazure, John C FIN:EX" <[John.Mazure@gov.bc.ca](mailto:John.Mazure@gov.bc.ca)>, "Baillie, Garth E FIN:EX" <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)>  
**Cc:** "Fitzgerald, Anna FIN:EX" <[Anna.Fitzgerald@gov.bc.ca](mailto:Anna.Fitzgerald@gov.bc.ca)>, "Jaggi-Smith, Michele FIN:EX" <[Michele.JaggiSmith@gov.bc.ca](mailto:Michele.JaggiSmith@gov.bc.ca)>  
**Subject: RE: Investigation and Termination of Registration**

John,

Synopsis of Facts and Reasons for Decision in the cancellation of s.22 registration is attached for your review. I understand you wish to have these briefs shortened but believe the detailed provided is needed to thoroughly understand the reasons behind Garth's judgement. s.13

s.13

s.13

If you have any questions or concerns, give me a call.

Cary

*Cary Skrine*

Regional Director  
Special Provincial Constable  
Compliance Division  
Gaming Policy & Enforcement Branch  
Ministry of the Attorney General  
#200 - 1517 Water St. Kelowna, BC V1Y 1J8  
Office (250) 861-5518 Fax (250) 861-7362  
Cell s.17

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---

**From:** Mazure, John C FIN:EX  
**Sent:** Friday, December 1, 2017 4:11 PM  
**To:** Skrine, Cary J FIN:EX; Baillie, Garth E FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX; Bruce, Kim M FIN:EX; Jaggi-Smith, Michele FIN:EX  
**Subject:** Investigation and Termination of Registration  
Cary/Garth, s.13,s.15,s.22  
s.13,s.15,s.22

**From:** [Akin, Richard GPEB:EX](#)  
**To:** [Stewart, Robert A GPEB:EX](#)  
**Subject:** RE: Investigation and Termination of Registration  
**Date:** Wednesday, December 6, 2017 2:23:09 PM

---

s.13,s.15,s.22

---

**From:** Fitzgerald, Anna FIN:EX  
**Sent:** Tuesday, December 5, 2017 8:04 AM  
**To:** Stewart, Robert A FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** Fwd: Investigation and Termination of Registration

Hello Bob

Could I request that you and your team put together a few bullet points to the<sup>s.22</sup> along  
the lines of,,,

s.13,s.22

Could I please ask this letter is drafted by Monday next week and the bullets completed in the next couple of days.

Thank you,  
Anna

Sent from my iPad

Begin forwarded message:

**From:** "Skrine, Cary J FIN:EX" <[Cary.Skrine@gov.bc.ca](mailto:Cary.Skrine@gov.bc.ca)>  
**Date:** December 1, 2017 at 7:54:28 PM PST  
**To:** "Mazure, John C FIN:EX" <[John.Mazure@gov.bc.ca](mailto:John.Mazure@gov.bc.ca)>, "Baillie, Garth E FIN:EX" <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)>  
**Cc:** "Fitzgerald, Anna FIN:EX" <[Anna.Fitzgerald@gov.bc.ca](mailto:Anna.Fitzgerald@gov.bc.ca)>, "Jaggi-Smith, Michele FIN:EX" <[Michele.JaggiSmith@gov.bc.ca](mailto:Michele.JaggiSmith@gov.bc.ca)>  
**Subject:** RE: Investigation and Termination of Registration

John,  
s.13,s.22

*Cary Skrine*

Regional Director  
Special Provincial Constable  
Compliance Division  
Gaming Policy & Enforcement Branch  
Ministry of the Attorney General  
#200 - 1517 Water St. Kelowna, BC V1Y 1J8  
Office (250) 861-5518 Fax (250) 861-7362  
Cell s.17

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**From:** Mazure, John C FIN:EX  
**Sent:** Friday, December 1, 2017 4:11 PM  
**To:** Skrine, Cary J FIN:EX; Baillie, Garth E FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX; Bruce, Kim M FIN:EX; Jaggi-Smith, Michele FIN:EX  
**Subject:** Investigation and Termination of Registration  
Cary/Garth, s.13,s.22

s.13,s.22

Page 017

Withheld pursuant to/removed as

s.22;s.13

**From:** Baillie, Garth E FIN:EX  
**To:** Mazure, John C FIN:EX  
**Subject:** RE: Confidential  
**Date:** Wednesday, December 6, 2017 7:26:00 AM

---

s.13

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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**From:** Mazure, John C FIN:EX  
**Sent:** Wednesday, December 6, 2017 7:26 AM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** RE: Confidential

Thank you Garth – that's why I asked. I will let Sam know the process is not yet complete and until such time it will be held confidential.

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Wednesday, December 6, 2017 7:24 AM  
**To:** Mazure, John C FIN:EX  
**Cc:** Kendall, Janelle FIN:EX; Fitzgerald, Anna FIN:EX; Jaggi-Smith, Michele FIN:EX  
**Subject:** RE: Confidential

John

s.13,s.22

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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**From:** Mazure, John C FIN:EX  
**Sent:** Tuesday, December 5, 2017 7:12 PM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Kendall, Janelle FIN:EX; Fitzgerald, Anna FIN:EX; Jaggi-Smith, Michele FIN:EX  
**Subject:** RE: Confidential

Sorry I missed the first part.

s.13,s.15

**From:** Mazure, John C FIN:EX  
**Sent:** Tuesday, December 5, 2017 7:07 PM  
**To:** Jaggi-Smith, Michele FIN:EX  
**Cc:** Kendall, Janelle FIN:EX; Baillie, Garth E FIN:EX; Fitzgerald, Anna FIN:EX

**Subject:** FW: Confidential

Hi Michele, I know you gave Megan a heads up on this but did we provide her with any info e.g., BN and/or Q&As?

---

**From:** Godfrey, Sam AG:EX

**Sent:** Tuesday, December 5, 2017 4:39 PM

**To:** Mazure, John C FIN:EX

**Subject:** RE: Confidential

John,  
s.13

Thank you, S.

**Sam Godfrey**

Ministerial Assistant to the Honourable David Eby, QC

Attorney General of British Columbia and Minister responsible for Liquor, Gaming and ICBC

Mobile: 250 208 1359 | Office: 250 952 7613

Rm 232, Parliament Buildings, 501 Belleville St., Victoria, B.C. V8V 1X4

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**From:** Mazure, John C FIN:EX

**Sent:** Sunday, December 3, 2017 9:55 AM

**To:** Godfrey, Sam AG:EX; Fyfe, Richard J JAG:EX

**Cc:** Harris, Megan A GCPE:EX

**Subject:** Confidential

Sam/Richard,  
s.13,s.15,s.22

From: [Mazure, John C FIN:EX](#)  
To: [Baillie, Garth E FIN:EX](#)  
Cc: [Bruce, Kim M FIN:EX](#)  
Subject: Re: s.22  
Date: Monday, December 4, 2017 3:18:17 PM

---

Very helpful. thx

Sent from my iPhone

On Dec 4, 2017, at 3:16 PM, Baillie, Garth E FIN:EX <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)> wrote:

John  
s.13,s.22

## Garth Baillie

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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**From:** Mazure, John C FIN:EX  
**Sent:** Monday, December 4, 2017 3:11 PM  
**To:** Baillie, Garth E FIN:EX; Kendall, Janelle FIN:EX; Bruce, Kim M FIN:EX  
**Subject:** RE:s.22  
Thx Garth. s.13

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Monday, December 4, 2017 3:10 PM  
**To:** Mazure, John C FIN:EX; Kendall, Janelle FIN:EX; Bruce, Kim M FIN:EX  
**Subject:** s.22

Good Afternoon

Just want to give you all a heads up that I just got off the phone with Pat Ennis at

GCGC. s.13,s.22

s.13,s.22

## Garth Baillie

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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**From:** Baillie, Garth E FIN:EX  
**To:** [Kendall, Janelle FIN:EX](#)  
**Subject:** RE: RRCR  
**Date:** Monday, December 4, 2017 2:11:00 PM  
**Attachments:** [Pointform review of the file and next steps.docx](#)

---

Hi Janelle – Here is a very simplistic point form review of the file and next milestones. Let me know if you need more detail.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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**From:** Bruce, Kim M FIN:EX  
**Sent:** Monday, December 4, 2017 12:59 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** FW: RRCR

---

**From:** Kendall, Janelle FIN:EX  
**Sent:** Monday, December 4, 2017 12:05 PM  
**To:** Bruce, Kim M FIN:EX  
**Subject:** FW: RRCR

Further to John's questions I spoke to you about earlier.

**Janelle Kendall** | Manager of Divisional Operations | Gaming Policy and Enforcement Branch – Ministry of the Attorney General

☎ s.17 e: [Janelle.Kendall@gov.bc.ca](mailto:Janelle.Kendall@gov.bc.ca) | m: PO Box 9202 STN PROV GOVT, Victoria BC V8W 9N1

Begin forwarded message:

**From:** "Godfrey, Sam AG:EX" <[Sam.Godfrey@gov.bc.ca](mailto:Sam.Godfrey@gov.bc.ca)>  
**Date:** December 4, 2017 at 10:37:02 AM PST  
**To:** "Mazure, John C FIN:EX" <[John.Mazure@gov.bc.ca](mailto:John.Mazure@gov.bc.ca)>  
**Subject:** RRCR

Hi John,  
s.13,s.22

Best, S.

**Sam Godfrey**

Ministerial Assistant, Ministry of Attorney General of British Columbia  
Mobile ☎ s.17 Office: 250 952 7613

Rm 232, Parliament Buildings, 501 Belleville St., Victoria, B.C. V8V 1X4

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From: [Mazure, John C GPEB:EX](#)  
To: [Akin, Richard GPEB:EX](#)  
Cc: [Fitzgerald, Anna GPEB:EX](#); [Stewart, Robert A GPEB:EX](#); [Samson, Heather GPEB:EX](#)  
Subject: Re: GPEB **s.15** - e  
Date: Wednesday, November 29, 2017 4:41:38 PM

---

Thx Richard.

Sent from my iPhone

On Nov 29, 2017, at 2:54 PM, Akin, Richard FIN:EX <[richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)> wrote:

Sir,

Here is the Report of Findings final report and the Registration decision for your perusal.

Richard

Investigator, Special Provincial Constable #917  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General  
408 – 4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Direct Line: (604) 660-2034  
Mobile: s.17  
Fax: (604) 660-2333  
Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)<<mailto:richard.akin@gov.bc.ca>>

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

.s.15 - Report of Findings - s.22

PDF>

**From:** [Stewart, Robert A FIN:EX](#)  
**To:** [Knight, Chris W FIN:EX](#); [Fitzgerald, Anna FIN:EX](#); [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
**Cc:** [McGregor, Scott FIN:EX](#)  
**Subject:** RE: Great presentatoin  
**Date:** Wednesday, November 29, 2017 2:38:03 PM  
**Attachments:** [image001.png](#)

---

Thanks Anna and Chris. I agree they did a great job.

Bob Stewart

Senior Regional Director

Compliance Division, Lower Mainland

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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**From:** Knight, Chris W FIN:EX  
**Sent:** Wednesday, November 29, 2017 2:31 PM  
**To:** Fitzgerald, Anna FIN:EX; Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX  
**Cc:** McGregor, Scott FIN:EX  
**Subject:** RE: Great presentatoin

I second that, great job and very thorough explanation.

*C.W. (Chris) Knight*

*Regional Director, Northern Region*

Special Provincial Constable

Compliance Division

Gaming Policy & Enforcement Branch

Prince George BC

Direct: 250-612-4131

Main office: 250-612-4122



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**From:** Fitzgerald, Anna FIN:EX  
**Sent:** Wednesday, November 29, 2017 2:25 PM  
**To:** Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX  
**Cc:** McGregor, Scott FIN:EX; Knight, Chris W FIN:EX  
**Subject:** Great presentatoin  
Hello Richard, Heather and Bob,

Thank you ever so much for a great presentation. I think it was very useful for John and I think good timing for us.

I was very excited and proud to hear how all your work rolled out.

Regards,

Anna

**From:** [Stewart, Robert A FIN:EX](#)  
**To:** [Vear, Maureen FIN:EX](#); [Akin, Richard FIN:EX](#); [Samson, Heather FIN:EX](#)  
**Cc:** [Fitzgerald, Anna FIN:EX](#)  
**Subject:** Re: Anna, Bob Stewart, Richard Akin - Overview of recent investigation  
**Date:** Wednesday, November 29, 2017 10:38:10 AM

---

Thank you, I am confident he will find it worthwhile

Bob Stewart  
Manager, Intelligence Unit &  
Lower Mainland Investigations  
Gaming Policy Enforcement Branch

---

**From:** Vear, Maureen FIN:EX  
**Sent:** Wednesday, November 29, 2017 10:26 AM  
**To:** Stewart, Robert A FIN:EX; Akin, Richard FIN:EX; Samson, Heather FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX  
**Subject:** RE: Anna, Bob Stewart, Richard Akin - Overview of recent investigation

---

John has confirmed he will stay for the presentation; the meeting will proceed as scheduled from the boardroom

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Wednesday, November 29, 2017 9:59 AM  
**To:** Vear, Maureen FIN:EX; Akin, Richard FIN:EX; Samson, Heather FIN:EX  
**Subject:** RE: Anna, Bob Stewart, Richard Akin - Overview of recent investigation

Hi Maureen,

The Investigators have prepared a 25minute, detailed briefing with PowerPoint slides. If possible I would like to see this re-scheduled for a video conference.

Your thoughts

Bob Stewart  
Senior Regional Director  
Compliance Division, Lower Mainland  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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

---

**From:** Vear, Maureen FIN:EX  
**Sent:** Wednesday, November 29, 2017 9:53 AM  
**To:** Stewart, Robert A FIN:EX; Akin, Richard FIN:EX; Samson, Heather FIN:EX  
**Subject:** FW: Anna, Bob Stewart, Richard Akin - Overview of recent investigation  
Resending

---

**From:** Vear, Maureen FIN:EX **On Behalf Of** Mazure, John C FIN:EX  
**Sent:** Wednesday, November 29, 2017 9:00 AM  
**To:** Fitzgerald, Anna FIN:EX; 'Stewart, Robert A FIN:EX'; 'Akin, Richard FIN:EX'; 'Samson, Heather FIN:EX'

**Cc:** Nagel, Kandice FIN:EX

**Subject:** RE: Anna, Bob Stewart, Richard Akin - Overview of recent investigation

Note that there is a slight chance that John will be s.22 and this could become a conference call.

Should that be the case, be please use dial-in information below.

**I will confirm with you prior to the scheduled time.**

s.15

**Participant** s.15 -----

-----Original Appointment-----

**From:** Nagel, Kandice FIN:EX **On Behalf Of** Fitzgerald, Anna FIN:EX

**Sent:** Thursday, November 23, 2017 12:29 PM

**To:** Fitzgerald, Anna FIN:EX; Mazure, John C FIN:EX; Stewart, Robert A FIN:EX; Akin, Richard FIN:EX; Samson, Heather FIN:EX

**Subject:** Anna, Bob Stewart, Richard Akin - Overview of recent investigation

**When:** Wednesday, November 29, 2017 1:00 PM-2:00 PM (UTC-08:00) Pacific Time (US & Canada).

**Where:** GPEB R Donna Hawkins Boardroom GPEB:EX

By video conference - Richard please book your boardroom.

**From:** [Ackles, Ken FIN:EX](#)  
**To:** [Akin, Richard FIN:EX](#)  
**Subject:** RE:s.22  
**Date:** Friday, November 24, 2017 11:18:21 AM

---

Thanks Rich

Good job by Kingsway Staff....pass on my kudos....

Ken

---

**From:** Akin, Richard FIN:EX  
**Sent:** Friday, November 24, 2017 10:26 AM  
**To:** Ackles, Ken FIN:EX  
**Subject:** s.22

Ken,

For your situational awareness.

Richard

Investigator, Special Provincial Constable #917

Gaming Policy and Enforcement Branch

Ministry of Attorney General

408 – 4603 Kingsway Avenue

Burnaby, BC V5H 4M4

Direct Line: (604) 660-2034

Mobile: S.17

Fax: (604) 660-2333

Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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

**From:** Baillie, Garth E FIN:EX  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** RE: e  
**Date:** Friday, November 24, 2017 10:13:00 AM

---

Thanks Heather – I have just been in correspondence with Richard Grimes the HR Manager at the River Rock and he confirmed as well. He acknowledged the cancelled registration just seconds ago.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Friday, November 24, 2017 10:12 AM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** RE: e

Hi Garth,

s.22

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Friday, November 24, 2017 9:12 AM  
**To:** Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX  
**Subject:** RE: e

Hi

Thanks Heather and Richard for a very through and well documented investigation. Great job you two.

Heather I have attached a copy of the decision that will be going out in the mail today.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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



*email from your mailbox.*

---

**From:** Samson, Heather FIN:EX

**Sent:** Friday, November 24, 2017 8:57 AM

**To:** Baillie, Garth E FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX

**Subject:** RE: c

Good Morning Garth,

Rich and I have read through the attached and we have no issues regarding content. I did highlight a few words in yellow for your review as there might be the odd spelling mistake or missing word (I think the word "policy" is missing in the third highlighted section).

Cheers,

Heather

---

**From:** Baillie, Garth E FIN:EX

**Sent:** Thursday, November 23, 2017 2:57 PM

**To:** Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX

**Subject:** s

Hi Richard

I have made some spelling corrections and reworked a couple of the last paragraphs for your review tomorrow.

*Garth Baillie*

Director, Deputy Registrar

Personnel Registration

Gaming Policy and Enforcement Branch

Direct phone (250) 356-0983

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

From: Baillie, Garth E FIN:EX  
To: "[rgrimes@riverrock.com](mailto:rgrimes@riverrock.com)"  
Subject: Cancelled Registration S.22  
Date: Friday, November 24, 2017 9:45:00 AM  
Attachments: [Cancellation of Registration blnk GCC.doc](#)

---

Good Day Richard

I have been trying to fax through the attached cancelled registration document however your fax that we generally send to is not answering. Please confirm receipt of the attached document as per the directions on the fax.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

**From:** Baillie, Garth E GPEB:EX  
**To:** [Stewart, Robert A GPEB:EX](#); [Samson, Heather GPEB:EX](#); [Akin, Richard GPEB:EX](#)  
**Subject:** RE: [s.1](#) | Report of Findings [s.22](#)  
**Date:** Thursday, November 23, 2017 12:21:10 PM  
**Attachments:** [s.22](#)

---

Good Day

Please find attached my decision in regards to [s.2](#) for comment or concern with regards to the considerable information that you gathered during this investigation.

*Garth Baillie*

Director, Deputy Registrar

Personnel Registration

Gaming Policy and Enforcement Branch

Direct phone (250) 356-0983

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

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Wednesday, November 8, 2017 2:56 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** FW: [s.1](#) | Report of Findings [s.22](#)

Hello Garth,

[s.13](#),[s.22](#)

Thanks

Bob Stewart

Manager, Intelligence Unit &

Lower Mainland Investigations

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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

**From:** Baillie, Garth E FIN:EX  
**To:** [Akin, Richard FIN:EX](#)  
**Subject:** RE: s.22  
**Date:** Wednesday, November 22, 2017 10:35:39 AM

---

Thanks Richard – As I indicated I am interested in the actual wording of the s.22 itself. I will make inquiries.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Akin, Richard FIN:EX  
**Sent:** Wednesday, November 22, 2017 9:00 AM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Samson, Heather FIN:EX  
**Subject:** FW: s.22

Hi Garth,

Heather is s.22 and I have located the following documents for your perusal. I don't believe we have the actual copy of the s.22

The attached email contains information within the 'Word' document that on February 19, 2016 s.22

Richard  
Investigator, Special Provincial Constable #917  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General  
408 – 4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Direct Line: (604) 660-2034  
Mobile: s.17

Fax: (604) 660-2333  
Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Tuesday, November 21, 2017 4:14 PM  
**To:** Akin, Richard FIN:EX  
**Subject:** Fwd: s.22

Hey Rich,

As I won't be s.22 I thought I'd flip this your way. s.22  
s.22 The open source doc might also specify. Everything should be on the N drive under my name in the post reg file for s.22

Cheers,  
Heather

Sent from my iPhone

Begin forwarded message:

**From:** "Baillie, Garth E FIN:EX" <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)>  
**Date:** November 21, 2017 at 3:21:55 PM PST  
**To:** "Samson, Heather FIN:EX" <[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)>, "Stewart, Robert A FIN:EX" <[Bob.Stewart@gov.bc.ca](mailto:Bob.Stewart@gov.bc.ca)>  
**Subject:** s.22

Good Afternoon

I am wondering if it is possible for you to send me a copy of the s.22  
s.22

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

**From:** [Akin, Richard GPEB:EX](#)  
**To:** [Stewart, Robert A GPEB:EX](#)  
**Subject:** FW: GPEB investigation s.22  
**Date:** Tuesday, November 21, 2017 3:11:06 PM

---

**From:** Samson, Heather FIN:EX  
**Sent:** Tuesday, November 21, 2017 10:37 AM  
**To:** 'Patrick Ennis'; 'mkim@riverrock.com'  
**Cc:** Akin, Richard FIN:EX  
**Subject:** GPEB investigation s.22

Hello Gentlemen,

Please be advised that we have completed s.13,s.15,s.22  
s.13,s.15,s.22

Thank you for your assistance and cooperation.

Sincerely,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

**From:** Baillie, Garth E GPEB:EX  
**To:** Samson, Heather GPEB:EX  
**Cc:** Stewart, Robert A GPEB:EX; Akin, Richard GPEB:EX  
**Subject:** RE: Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
**Date:** Friday, November 17, 2017 7:19:41 AM

---

Thanks Heather – I have looked at these sections online yesterday and just wanted to be sure I was looking at the same information as you had been. Much appreciated.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Friday, November 17, 2017 6:24 AM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Stewart, Robert A FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE: Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
Morning Garth,  
s.13,s.15,s.22

I've CC'd Bob and Richard just to ensure that everyone has been looped in to my response.  
I hope the above is helpful. If you have any further questions or concerns, please do not hesitate to get in touch.

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Thursday, November 16, 2017 2:54 PM  
**To:** Samson, Heather FIN:EX  
**Subject:** Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
Hi Heather

Do you or can you direct me to the sections of the Act and regulations that we are dealing with?

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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



**From:** Baillie, Garth E GPEB:EX  
**To:** [Stewart, Robert A GPEB:EX](#)  
**Subject:** RE: ~ 1 | Report of Findings s.22  
**Date:** Thursday, November 16, 2017 2:22:34 PM

---

Hi Bob – I will forward a copy to Robin. I am not sure what I am going to do yet but will send my decision to Heather for confirmation of the evidence I quote prior to my decision going out of here.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Thursday, November 16, 2017 2:21 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** RE:s.15 Report of Findings s.22  
Hi Garth,

In meetings with the Ontario Alcohol and Gaming people today sorry for not getting back to you right away. s.13,s.15

s.13,s.15

Also, will you forward a copy to Robin Jomha or would you like me to?

Thanks

Bob Stewart  
Manager, Intelligence Unit &  
Lower Mainland Investigations  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Thursday, November 16, 2017 9:47 AM  
**To:** Stewart, Robert A FIN:EX  
**Subject:** RE: s.15 Report of Findings s.22  
I am available right now


*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

*email from your mailbox.*

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Thursday, November 16, 2017 9:35 AM  
**To:** Baillie, Garth E FIN:EX; Samson, Heather FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE:  1 | Report of Findings s.22

Garth,


I think it would helpful if we had a conference call with Heather, Scott, you and me to discuss this. If not right now then between 2 and 3 today, or Monday will work for us.

Bob Stewart

Manager, Intelligence Unit &  
Lower Mainland Investigations  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Thursday, November 16, 2017 8:47 AM  
**To:** Stewart, Robert A FIN:EX; Samson, Heather FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE:  1 | Report of Findings s.22

Hi Heather and Bob

s.13,s.15

s.15,s.22


Thanks

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Wednesday, November 8, 2017 2:56 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** FW:  15 | Report of Findings s.22

Hello Garth,

Please find attached the Report of Findings regarding the investigation into the RRCR and  
s.15,s.22

s.15,s.22

. Please call to discuss after you have reviewed the document. I believe we should forward a copy of this to Robin Jomha, Director of Corporate

Registration, once you have had a chance look at it.

Thanks

Bob Stewart

Manager, Intelligence Unit &

Lower Mainland Investigations

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0271

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

**From:** [Stenerson, Laurin P GPEB:EX](#)  
**To:** [Akin, Richard GPEB:EX](#)  
**Subject:** **S.15**  
**Date:** Friday, November 10, 2017 12:55:49 PM  
**Attachments:** **.S.15**

---

From: [Akin, Richard FIN:EX](#)  
To: [Ackles, Ken FIN:EX](#)  
Cc: ["Robinson, Ben"; Samson, Heather FIN:EX](#)  
Subject: RE: RE: s.22  
Date: Friday, November 10, 2017 11:34:00 AM  
Attachments: s.22

---

Hi Ken,

Here is the s.15

s.15 It was sent to Garth a few days ago.

Richard

---

**From:** Ackles, Ken FIN:EX  
**Sent:** Friday, November 10, 2017 11:23 AM  
**To:** Akin, Richard FIN:EX  
**Cc:** 'Robinson, Ben'  
**Subject:** RE s.22

Rich

Can you send me a brief summary of the s.22 investigation including the genesis of the file.  
(perhaps a copy of the ROF)

Thanks

Ken

Ken Ackles

Manager of Investigations (JIGIT),  
Joint Illegal Gaming Investigation Team  
Gaming Policy and Enforcement Branch  
Province of British Columbia - Combined Forces Special Enforcement Unit  
14200 Green Timbers Way, Surrey B.C.  
V3T 6P3

Direct Line: (778) 290-4766

Mobile: s.17

Fax: (778) 290-6101

e-mail: [Kenneth.Ackles@cfseu.bc.ca](mailto:Kenneth.Ackles@cfseu.bc.ca)

Burnaby Office

Compliance Division

Gambling Policy & Enforcement Branch

408 – 4603 Kingsway Avenue

Burnaby, BC V5H 4M4

E-mail: [Ken.Ackles@gov.bc.ca](mailto:Ken.Ackles@gov.bc.ca)

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

**From:** [Akin, Richard FIN:EX](#)  
**To:** [McGregor, Scott FIN:EX](#)  
**Subject:** FW: S.15 - Report of Findings - s.22  
**Date:** Thursday, November 2, 2017 2:23:37 PM  
**Attachments:** s.22

---

**From:** Samson, Heather FIN:EX  
**Sent:** Wednesday, November 1, 2017 1:19 PM  
**To:** Stewart, Robert A FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** S.15 - Report of Findings - s.22

Hi Bob,

Please find attached the final draft of the Report of Findings for S.22 for your review. I haven't PDF'd the document yet, so please let me know if any changes are required.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

From: [Samson, Heather GPEB:EX](#)  
To: [Stenerson, Laurin P GPEB:EX](#)  
Subject: Report of Findings - e  
Date: Wednesday, November 1, 2017 1:51:19 PM  
Attachments: s.22

---

For your reading pleasure.....

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

Heather.Samson@gov.bc.ca

From: [Samson, Heather FIN:EX](#)  
To: [Akin, Richard FIN:EX](#)  
Subject: Report of Findings - [s.22](#)  
Date: Wednesday, November 1, 2017 11:38:00 AM  
Attachments: [s.22](#)

---

Hey Rich,  
Attached is the revised draft of the [s.22](#) Report of Findings.  
Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: [s.17](#)  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)



Page 045 to/à Page 046

Withheld pursuant to/removed as

s.22;s.15;s.21

Page 047

Withheld pursuant to/removed as

s.16

From: [Ackles, Ken FIN:EX](#)  
To: [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
Subject: Re: s.15,s.22  
Date: Thursday, October 19, 2017 5:24:36 PM

---

No problem Heather I am concerned that s.13

Sent from my BlackBerry 10 smartphone on the Rogers network.

---

**From:** Samson, Heather FIN:EX  
**Sent:** Thursday, October 19, 2017 12:59 PM  
**To:** Akin, Richard FIN:EX; Ackles, Ken FIN:EX  
**Subject:** s.15,s.22

---

Hi Ken,  
s.13,s.15,s.22

s.13,s.15 . She's sending a follow up email tomorrow just so I have a record of what she mentioned on the phone. I will forward that your way once I receive it.

If you have any question, let me know.

s.15

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.17  
Heather.Samson@gov.bc.ca

**From:** Patrick Ennis  
**To:** [Samson, Heather FIN:EX](#)  
**Cc:** [Akin, Richard FIN:EX](#)  
**Subject:** RE: Section 86(1) Demand re: s.15  
**Date:** Thursday, October 19, 2017 8:28:48 AM

---

No problem. I will get them started on gathering everything up for you today.

---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** Thursday, October 19, 2017 7:10 AM

**To:** Patrick Ennis

**Cc:** Akin, Richard FIN:EX

**Subject:** Section 86(1) Demand re: s.15

Good Morning Pat,

Please see attached 86(1) Demand. The intention always was to send in the request, we just wanted to ascertain who would be the best person to direct it to.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.15

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

s.15,s.21,s.22

s.21,s.22

Begin forwarded message:

**From:** "Samson, Heather FIN:EX" <[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)>  
**Date:** October 18, 2017 at 13:23:26 PDT  
**To:** 'Michael Kim' <[mkim@riverrock.com](mailto:mkim@riverrock.com)>  
**Cc:** "Akin, Richard FIN:EX" <[richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)>  
**Subject:** RE: Meeting with GPEB

Hi Michael,

Thanks again for finding time to talk with us today.

s.15,s.21,s.22

Thank you,

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

Page 051

Withheld pursuant to/removed as

s.22;s.15;s.21

Page 052

Withheld pursuant to/removed as

s.22;s.15;s.21;s.17

Page 053 to/à Page 054

Withheld pursuant to/removed as

s.22;s.15;s.21



Page 055

Withheld pursuant to/removed as

s.22;s.15;s.21;s.17

Page 056

Withheld pursuant to/removed as

s.22;s.15;s.21

Page 057

Withheld pursuant to/removed as

s.22;s.15;s.21;s.17

s.15,s.21,s.22

On Oct 18, 2017, at 8:00 AM, Samson, Heather FIN:EX  
<Heather.Samson@gov.bc.ca<<mailto:Heather.Samson@gov.bc.ca>>> wrote:

Good Morning Bal,  
s.22

Thank you for your time.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: (s.17  
Heather.Samson@gov.bc.ca<<mailto:Heather.Samson@gov.bc.ca>>

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From: [Samson, Heather FIN:EX](#)  
To: [Akin, Richard FIN:EX](#)  
Subject: FW: Section 86 request  
Date: Monday, October 16, 2017 10:52:20 AM  
Attachments: **S.22**

---

FYI

---

s.21,s.22

From: [Samson, Heather FIN:EX](#)  
To: [Akin, Richard FIN:EX](#)  
Subject: ☒ - Draft Interview Plan  
Date: Monday, October 16, 2017 10:24:23 AM  
Attachments: S.22

---

Hey Rich,

As discussed, here is a rough S.22  
want to take a once over.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

Heather.Samson@gov.bc.ca

. We can chat more later, but I figured you'd

**From:** [Stewart, Robert A FIN:EX](#)  
**To:** [Akin, Richard FIN:EX](#)  
**Subject:** FW: Revisions to BCLC Standards, Policies and Procedures for Casinos and Community Gaming Centres - GPEB  
**Date:** Friday, October 13, 2017 1:46:11 PM  
**Attachments:** [NTI 19 - Change Log - Casino and Community Gaming Centres - with INTERNALS - for July 2017 - GPEB.doc](#)

---

Bob Stewart  
Manager, Intelligence Unit &  
Lower Mainland Investigations  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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---

**From:** Storms, Timothy FIN:EX  
**Sent:** Thursday, July 6, 2017 6:47 PM  
**To:** Tan, Nicholas FIN:EX; Basi, Parminder FIN:EX; Whittred, Sue FIN:EX; Jacob, Terry FIN:EX; Nikolic, Bojan FIN:EX; VanderWerf, Neil FIN:EX; Chan, Raymond FIN:EX; Grecu, Marian FIN:EX; Li, Lynn FIN:EX; Smithson, Dallas H FIN:EX  
**Cc:** Mayer, Douglas FIN:EX; Skrine, Cary J FIN:EX; Knight, Chris W FIN:EX; Werner, Peter H FIN:EX; Stewart, Robert A FIN:EX; Akin, Richard FIN:EX  
**Subject:** Fw: Revisions to BCLC Standards, Policies and Procedures for Casinos and Community Gaming Centres - GPEB

FYI - please see advanced notice (in the attached Notice To Implement file) of upcoming changes to the BCLC Policies and Procedures scheduled to come into effect on or before July 24 2017.

When the updated Policy and Procedure Manuals have been released on the BCLC Extranet at that time, I will send you notification that the revised manuals have been saved on the K: Drive or provide you with copies of the manuals for those in the regions.

Thanks

Tim

From: GPEBSec86Req  
To: [Samson, Heather FIN:EX; GPEBSec86Req](#)  
Cc: [Akin, Richard FIN:EX](#)  
Subject: RE: **s.15** RE: Section 86 Demand  
Date: Friday, October 13, 2017 9:10:32 AM

---

Good morning Heather,

As requested, **s.15** has been revised to include the additional documents from the **s.15** project detailing each instance where **s.22** acted as a translator. The revised file (Disclosure 7 – 20170052344 – **s.15**) has been uploaded to the SFTP site **s.22**

If you need anything further please let us know.

Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 225 6278

-----Original Message-----

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 3:12 PM  
To: GPEBSec86Req <[GPEBLotterySec86@bcllc.com](mailto:GPEBLotterySec86@bcllc.com)>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)>  
Subject: Re: **s.15** RE: Section 86 Demand

Hi Andrea,

Yes, I would like copies of the supplemental reports (any that have not already been provided as part of **s.15** where **s.22** translated.

Thanks again. Appreciate the assistance.

Cheers,  
Heather

Sent from my iPhone

On Oct 12, 2017, at 2:42 PM, GPEBSec86Req  
<[GPEBLotterySec86@bcllc.com](mailto:GPEBLotterySec86@bcllc.com)<<mailto:GPEBLotterySec86@bcllc.com>>> wrote:

Hi Heather,

**s.15,s.22**

Please let me know if you would like copies of the supplemental reports in which **s.22** translated.



Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6 T 604 225 6278

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

anicholls@bclc.com<<mailto:anicholls@bclc.com>>

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 1:49 PM  
To: Andrea Nicholls <[ANicholls@bclc.com](mailto:ANicholls@bclc.com)<<mailto:ANicholls@bclc.com>>>; GPEBSec86Req  
<[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: RE: S.15 RE: Section 86 Demand

Hi Andrea,

Quick question. It wasn't clear from the disclosure document, is this the only document where ⌘ appears as translator? Are there any other Intelligence Summaries or Interview Summaries that are in BCLC's possession that feature ⌘ that we haven't already received?

Thank you.

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: S.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

From: Andrea Nicholls [<mailto:ANicholls@bclc.com>]  
Sent: Thursday, October 12, 2017 1:36 PM  
To: Samson, Heather FIN:EX; GPEBSec86Req  
Cc: Akin, Richard FIN:EX  
Subject: RE S.15 RE: Section 86 Demand

Good afternoon Heather,

The file has been uploaded to the SFTP site under LMD Region under your name. It is called S.15

s.15

Let us know if you require anything further.

Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6 T 604 225 6278

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

anicholls@bclc.com<<mailto:anicholls@bclc.com>>

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Blog<<http://blogs.bclc.com/>> | bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 11:35 AM  
To: GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: RE s.15 RE: Section 86 Demand

Hello Evonne,

It has come to my attention that a document exists from September 2015 (it may be referred to as a BCLC Interview Intelligence Summary) wherein s.22 acted as a s.22 s.22 for the interview. I believe the BCLC investigator listed on the document was Brad DESMERAIS and the interview also included the GCGC CEO (Rob Baker) and COO (Terrence DOYLE).

As part of the most recent disclosure, could I please get a copy of the above noted document in addition to any other document / Intelligence Interview Summary not already provided where s.22 acted as translator?

Thanks for all you help.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

From: GPEBSec86Req [<mailto:GPEBLotterySec86@bclc.com>]  
Sent: Wednesday, October 11, 2017 5:44 PM

To: Samson, Heather FIN:EX; GPEBSec86Req  
Cc: Akin, Richard FIN:EX  
Subject: S.15 RE: Section 86 Demand

Hi Heather,

The file has been uploaded to the SFTP site under LMD Region S.15  
S.15

Let me know if you require anything else.

Thanks,  
et

Evonne Tang  
Administrative Assistant  
Corporate Security and Compliance, BCLC

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

T 604 225 6403 F 604 225 6488

E etang@bclc.com<<mailto:etang@bclc.com>>

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

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bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: Tuesday, October 10, 2017 10:56 AM  
To: GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: Section 86 Demand

Please see attached.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney  
General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: S.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

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From: [McGregor, Scott FIN:EX](#)  
To: [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
Cc: [Stewart, Robert A FIN:EX](#)  
Subject: s.15,s.22  
Date: Thursday, October 12, 2017 8:53:30 AM  
Attachments: s 22 [Interview Summary.pdf](#)

---

All,

This document was shared by the RCMP with GPEB as it relates to the Integrity of Gaming and the Gaming Control Act.

This sharing of information was conducted in accordance with the protocols set out for LE to LE sharing with the intention of providing Intelligence which enhances situational awareness.

V/R

Scott McGregor  
GPEB Intel Unit

Page 068 to/à Page 069

Withheld pursuant to/removed as

s.22;s.15;s.17

Page 070

Withheld pursuant to/removed as

s.22;s.15

From: [Samson, Heather FIN:EX](#)  
To: ["intelligence-renseignement@fintrac-canafe.gc.ca"](mailto:intelligence-renseignement@fintrac-canafe.gc.ca)  
Cc: [Akin, Richard FIN:EX](#)  
Subject: VIR Request  
Date: Wednesday, October 11, 2017 2:06:31 PM  
Attachments: [Voluntary Information Record 1 2016 S .doc](#)

---

Please see attached.

Thank you.

Heather Samson

Investigator, Special Provincial Constable Badge #937

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue



Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)



From: [Samson, Heather FIN:EX](#)  
To: [Akin, Richard FIN:EX](#)  
Subject: Voluntary Information Record - FINTRAC -   
Date: Wednesday, October 11, 2017 1:00:10 PM  
Attachments: [Voluntary Information Record 1 2016](#)  doc

---

Hey Rich,  
s.15,s.22

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

From: [Samson, Heather FIN:EX](#)  
To: [McGregor, Scott FIN:EX](#)  
Subject: FINTRAC VIR - [S.17](#)  
Date: Wednesday, October 11, 2017 11:32:29 AM  
Attachments: [Voluntary Information Record 1 2016 S.2 doc](#)

---

I haven't completed the Investigative details section yet, but fill out what you feel may be pertinent.

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

From: [Samson, Heather GPEB:EX](#)  
To: [Stenerson, Laurin P GPEB:EX](#)  
Subject: **S.22** contact info  
Date: Thursday, October 5, 2017 8:22:48 AM

---

Hey Laurin,  
s.21,s.22

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: (S.17  
Heather.Samson@gov.bc.ca

**From:** Richard Grimes  
**To:** Stenerson, Laurin P GPEB:EX; Baljit Sajan  
**Subject:** RE: Further Assistance  
**Date:** Wednesday, October 4, 2017 4:59:57 PM  
**Attachments:** s.15,s.22

---

Hi Laurin,  
Please see the attached JD as per your request.  
Please see the below to answer your questions.  
I hope this meets your needs!  
Thank you.

---

**From:** Stenerson, Laurin P FIN:EX [<mailto:Laurin.Stenerson@gov.bc.ca>]  
**Sent:** Wednesday, October 04, 2017 11:26 AM  
**To:** Baljit Sajan  
**Subject:** FW: Further Assistance  
Good morning Bal:  
s.21,s.22

Thank you  
Laurin

---

**From:** Stenerson, Laurin P FIN:EX  
**Sent:** Friday, September 29, 2017 10:12 AM  
**To:** 'Baljit Sajan'  
**Subject:** Further Assistance  
Hi Bal:  
Are you able to provide me with the following information:  
s.15,s.22

s.15,s.22

Your assistance is greatly appreciated  
Laurin Stenerson, Investigator  
Special Provincial Constable  
Ministry of Attorney General  
Gaming Policy and Enforcement Branch  
Compliance Division  
408-4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Cell: S.17

[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)

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From: [Samson, Heather GPEB:EX](#)  
To: [Stenerson, Laurin P GPEB:EX](#)  
Cc: [Akin, Richard GPEB:EX](#)  
Subject: Information request for Bal  
Date: Friday, September 29, 2017 9:50:44 AM

---

Hey Laurin,  
I'm looking to get the following from Bal:  
s.15,s.22

Thank you.  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.17  
Heather.Samson@gov.bc.ca

s.21,s.22

**From:** Stenerson, Laurin P FIN:EX [mailto:Laurin.Stenerson@gov.bc.ca]

**Sent:** Tuesday, September 26, 2017 8:27 AM

**To:** Baljit Sajan

**Subject:** Work Schedule/ Position Description

Good morning Bal:

s.15,s.21,s.22

Thank you

Laurin Stenerson, Investigator

Special Provincial Constable

Ministry of Attorney General

Gaming Policy and Enforcement Branch

Compliance Division

408-4603 Kingsway Avenue

Burnaby, BC V5H 4M4

Cell: S.17

[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)

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From: [Samson, Heather GPEB:EX](#)  
To: [Stenerson, Laurin P GPEB:EX](#)  
Subject: s.15  
Date: Monday, September 25, 2017 8:17:24 AM  
Attachments: s.15

---

Hey Laurin,  
s.15,s.21,s.22

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: S.17  
Heather.Samson@gov.bc.ca



From: [Akin, Richard GPEB:EX](#)  
To: [Samson, Heather GPEB:EX](#)  
Cc: [Stenerson, Laurin P GPEB:EX](#)  
Subject: Emailing: s.15  
Date: Friday, September 22, 2017 7:21:45 PM  
Attachments: s.15

---

Your message is ready to be sent with the following file or link attachments:

s.15

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Page 081 to/à Page 098

Withheld pursuant to/removed as

s.22;s.15

Page 099 to/à Page 100

Withheld pursuant to/removed as

s.15

Page 101 to/à Page 130

Withheld pursuant to/removed as

s.22;s.15

Page 131 to/à Page 147

Withheld pursuant to/removed as

s.15

Page 148 to/à Page 149

Withheld pursuant to/removed as

s.22;s.15

Page 150 to/à Page 152

Withheld pursuant to/removed as

s.15;s.21

Page 153 to/à Page 191

Withheld pursuant to/removed as

s.22;s.15



Page 192 to/à Page 208

Withheld pursuant to/removed as

s.15

Page 209 to/à Page 210

Withheld pursuant to/removed as

s.22;s.15

Page 211 to/à Page 213

Withheld pursuant to/removed as

s.15;s.21

Page 214 to/à Page 220

Withheld pursuant to/removed as

s.22;s.15

Page 221 to/à Page 222

Withheld pursuant to/removed as

s.22;s.13



Date: 2017-12-08

John Karlovcec  
Director AML and Investigations  
British Columbia Lottery Corporation  
2940 Virtual Way,  
Vancouver, BC, V5M0A6

[e-mail:JKarlovcec@bclc.com](mailto:JKarlovcec@bclc.com)

Dear Mr. Karlovcec:

On September 14th, 2017 Ross Alderson, Director, BCLC AML and Investigations advised GPEB Compliance via e-mail that a matter of concern had occurred at the River Rock Casino Resort on 2017-09-13. The level of concern was determined to be serious enough that both the Great Canadian Gaming Corporation and BCLC requested that GPEB take conduct of the investigation which centered around an incident where a: "third party cash buy-in for 200K on behalf of a banned individual was allowed by the site". The specific concerns regarding the matter were detailed in the e-mail as follows:

- "In June 2017 new FINTRAC requirements came out regarding third party buys in and reasonable measures. BCLC provided new policy that every \$10K buys in and disbursement required a declaration of ownership. In this case BCLC have obtained a copy of the declaration and it appears the individual buying in claimed the funds were his although it is alleged that some RRCR clearly knew this to be false. This would be a violation of the record keeping requirements as set out by FINTRAC.

s.15

- BCLC do not allow third party buy in transactions and this transaction therefore should have been refused.
- Avoidance of FINTRAC reporting by a banned individual.
- Disregard of previous BCLC Direction around Chip Security."

After completing a thorough investigation GPEB Compliance forwarded the results to our Registration Division for independent review. Pursuant to Section 81(4)(b) we are reporting that on 2017-11-24 GPEB Registration cancelled s.22

s.22

...../P.2

s.15

Please contact me if you wish to discuss further.

Sincerely,

A handwritten signature in black ink, appearing to read 'R Stewart', with a stylized, cursive script.

Bob Stewart,  
Senior Regional Director,  
Lower Mainland, Compliance Division  
Gaming Policy and Enforcement Branch

c.c. Anna Fitzgerald, Executive Director, GPEB Compliance Division  
Daryl Tottenham, Manager AML Programs, BCLC

Page 225

Withheld pursuant to/removed as

s.15;s.21



Page 226 to/à Page 235

Withheld pursuant to/removed as

s.22;s.15

Page 236

Withheld pursuant to/removed as

s.15;s.21

## Cancellation of Gaming Worker Registration

### SUGGESTED RESPONSE:

- Early in November, the Gaming Policy and Enforcement Branch (GPEB) began investigating an employee of the River Rock Casino after it was reported was alleged the employee acted in direct violation of BCLC and FINTRAC directives. had been complicit in money laundering.
- s.13
- GPEB reviewed the registration of the employee under the Gaming Control Act and on November XX cancelled the gaming worker's registration.
- Under the Act, the gaming worker has 30 days from the date of the decision to submit written reconsideration.
- If a request for reconsideration is received, GPEB will review and either confirm or vary the decision within 60 days of receiving the request.
- We must address money laundering and allegations of criminality related to B.C. gambling facilities.
- Peter German is leading a review into anti-money laundering practices in B.C. casinos and the Lower Mainland, and has already provided me with an early set of recommendations.
- I have directed BCLC and (GPEB) to implement them as soon as possible.
- Protecting public confidence means ensuring that high standards are enforced for gambling industry companies and workers, and that criminals are kept out of casinos.
- I very much appreciate Mr. German's recommendations and I look forward to hearing more from him when he deems appropriate.

Comment [PNF1]: S. has not been charged with money laundering (this is not GPEB's role).

Comment [BKMF2]: Too much detail

Comment [PNF3]: These bullets link the German review to this decision. Recommend removing from this issues note.

## ISSUE NOTE: Attorney General 2017-12-06

### BACKGROUND:

| ~~Garth Baillie~~, GPEB's Director of ~~Public Personnel~~ Registration, has issued the decision ~~decided~~ to cancel the gaming worker registration of s.22  
s.22 at the River Rock Casino Resort (RRCR). s.22  
s.22

On June 15, 2017, BCLC issued a directive to all BC Casinos and Community Gaming Centres in regards to FINTRAC issued amendments to the Reasonable Measures form. The directive required the gambling centres to complete enhanced due diligence efforts to determine and document ownership of funds for all transactions of \$10,000 or more within a 24 hour period. The directive requires that the third party must be present during third party buy-ins and that the third party's ID must be scanned into the system before the transaction can be completed. If the third party is not present to provide this information the transaction must be refused.

s.15,s.22

Program Area	Deputy / ADM	GCPE
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**ISSUE NOTE: Attorney General 2017-12-06**

N. Pandachuck – <del>xx</del> <u>Dec.</u> <u>06</u> /17 J. Hazel – xx/17	L. Meilleur, ADM – xx/17	L. Butler – Dec. 7/17 T. Nelson – XX/17 M. Harris – XX/17
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Page 240 of 331

Page 241 to/à Page 242

Withheld pursuant to/removed as

s.22;s.15

Page 243 to/à Page 244

Withheld pursuant to/removed as

s.22;s.15;s.13



Page 245 to/à Page 246

Withheld pursuant to/removed as

s.22;s.15

**Notice to Implement (NTI) # 19 addendum – Changes for Casino and Community Gaming Centre Standards, Policies and Procedures for release July 6, 2017 and implementation immediately, July 24, 2017 or August 9, 2017 as indicated**

**1-2.1 General – Privacy and Protection of Personal Information** - added the ability for a new hire to work under supervision for up to 1 day before requiring AML training. This revision was made in response to a Service Provider change request.

**1-2.3 General – FINTRAC and Anti-Money Laundering Compliance** – added the 'reasonable measures' instruction for compliance to the new FINTRAC regulations, added the ability for a new hire to work under supervision for up to 1 day before requiring AML training, updated role titles for Compliance Regime. This revision was made partially in response to a Service Provider change request and partially due to new regulations.

**1-4.1 General – Responsible Gambling** - clarified which concession areas must have responsible gambling signage/brochures, noted which signage/brochures are provided by GPEB, clarified that signage **and/or** brochures (as specified in the chart) are required. This revision was made in response to a Service Provider change request.

**1-11.1 General – Financial** – clarified reporting obligations for annual and quarterly financial reporting. This revision was requested from BCLC Decision Support.

**1-12.2 – General Cash Assets – Found Money** – introduced instruction and a new account for found money where the person losing it is known to staff; Slot Supervisor is no longer required to attend the slot machine when Slot Attendant is cashing out credits left on machine as long as Surveillance is called (or Security in an unmanned facility); revised the dollar amount and timing for delivery to Cage for found gaming tickets. This revision was made partially in response to a Service Provider change request and partially in response to a Gaming Compliance request.

**2-2.1 Player Relations/Marketing – Encore Rewards Program** – revisions to the Terms and Conditions made for on-line registration of applications for membership in the Encore Rewards Player Program via Encore Rewards.ca. The on-line registration will go live Aug 9 and therefore the implementation of these changes is August 9, 2017.

**2-2.2 Player Relations/Marketing – Encore Rewards Program – Customer Service Responsibilities** – revisions made for on-line registration of applications for membership in the Encore Rewards Player Program via Encore Rewards.ca. The on-line registration will go live Aug 9 and therefore the implementation of these changes is August 9, 2017.

Also clarified the table free play coupons must be generated from the CMP in order to qualify for BCLC's deduction from net win and subsequent reconciliation. This clarification is effective immediately.

**3-6.1 Cage – Redemption Machines** – Count/Drop Team Manager/Supervisor has been added as one of the supervisory roles to oversee fills and counts and, under supervision, two registered gaming employees can complete the fills and counts. This revision was made in response to a Service Provider change request.

**3-8.1 Cage – Large Cash Transaction, Foreign Exchange and Disbursement Reporting** – added instruction for 'reasonable measures' to document and determine ownership of funds as per the new requirements for compliance to FINTRAC regulations.

**3-8.3 Cage – Patron Gaming Funds Accounts** – introduced the verification checklist that must be completed for acceptance of bank drafts and certified cheques. Effective immediately as this change has been previously communicated  
Also introduced two scenarios where sourced cash may be accepted if conditions are followed. Effective date is July 24, 2017  
Eliminated the definitions for Canadian and U.S. regulated financial institutions, replacing them with a reference to the Office of the Superintendent of Financial Institutions. Effective date is July 24, 2017.

**3-9.2 Cage – Certified Cheques** – introduced the verification checklist that must be completed for acceptance of bank drafts and certified cheques, removed CMS references.

**4-6.4 Slots – Progressive and Mystery Games** – updated this policy to align with changes previously made to the Slots – Jackpots and Large Cancelled Credits policy regarding personnel and signatures required.

**4-7.3 Slots – Count** – updated this policy to align with changes previously made to the General – Customer Service Standards and Expectations policy regarding inspections of jumpsuits.

**5-2.1 Table Games – Equipment – General** – updated acronym chart with Classic EZ Baccarat (CEZB).

**5-6.1 Table Games – Match or Free Play Coupon** - Clarified the table free play coupons must be generated from the CMP in order to qualify for BCLC's deduction from net win and subsequent reconciliation. If a non-CMP generated free play coupon is accepted at the table it will not qualify for net win deduction.

**6-6.10.1 Rules of Play – Table Poker – Optional Jackpots – Bad Beat Jackpot** – introduced the capping of Bad Beat Jackpots with applicable instructions/conditions. This revision was made in response to a Service Provider change request and extended to all Service Providers.

**6-6.10.2 Rules of Play – Table Poker – Optional Jackpots – Wide Area Bad Beat Jackpot** - introduced the capping of Wide Area Bad Beat Jackpots with applicable instructions/conditions. This revision was made in response to a Service Provider change request and extended to all Service Providers.

**7-1.1 Bingo - Sales and Gaming** – divided section 7 Bingo – Sales and Gaming into 3 sections – 7-1.1 Bingo – Sales, 7-2.1 Bingo – Gaming and 7-3.1 Bingo – Definitions for better clarity.  
Moved MANAGING BINGO PAPER PRODUCTS subsection to Bingo – Sales.  
Added the Bingo Event Tickets game into the Bingo – Gaming section as the pilot has now been completed.

**Form – Reasonable Measures Template** – to be used when determining and documenting whether a third party is involved in a reportable transaction

**Form – Verification Checklist for Bank Drafts/Certified Cheques** – to be used as identified in the Player Gaming Funds Account policy and the Certified Cheques policy

**Associated Document – BCLC Cheque Issuance and EFT Training Manual** – as of June 23, 2017 – updated for the allowed 'sourced cash' deposits

## **BCLC Surveillance Standards, Policies and Procedures**

### **Policy Control Level (PCL) 1 & 2 facilities**

No revisions for this NTI

### **Policy Control Level (PCL) 3 & 4 facilities**

No revisions for this NTI

### **Policy Control Level (PCL) 5 facilities**

No revisions for this NTI

## **Casino and Community Gaming Centre Facility Design Standards**

No revisions for this NTI

## **INTERNAL Casino and Community Gaming Centre Standards, Policies and Procedures**

**1-8.1 General – Encore Rewards Program** – When a VSE application has been processed at the site but not all points have been paid out or are able to be viewed by Service Provider staff, BCLC Representatives are responsible for adjusting points to zero for all bucket groups. (for example – SP points awarded at another location)

**1-10.1 General – Slots – Enables and Disables – INTERNAL** – revised to align with the changes to the Service Provider facing policy in the last NTI

**Bingo Standards, Policies and Procedures (Bingo only facilities)** – see also separate NTI verification and change log

**1-3.1 General – Responsible Gambling** – clarified which concession areas must have responsible gambling signage/brochures, noted which signage/brochures are provided by GPEB

**1-7.1 – Bingo Gaming – Bingo Event Tickets** – pilot has been completed successfully, policy added to the master document

Page 250 to/à Page 291

Withheld pursuant to/removed as

s.22;s.15

Page 292 to/à Page 307

Withheld pursuant to/removed as

s.15

Page 308 to/à Page 309

Withheld pursuant to/removed as

s.22;s.15

Page 310 to/à Page 312

Withheld pursuant to/removed as

s.15;s.21



Page 313 to/à Page 319

Withheld pursuant to/removed as

s.22;s.15

Page 320 to/à Page 324

Withheld pursuant to/removed as

s.22

Page 325 to/à Page 326

Withheld pursuant to/removed as

s.21

Page 327 to/à Page 328

Withheld pursuant to/removed as

s.16

Page 329

Withheld pursuant to/removed as

s.16;s.22

Page 330

Withheld pursuant to/removed as

s.16

Page 331

Withheld pursuant to/removed as

s.16;s.22

**From:** [Akin, Richard GPEB:EX](#)  
**To:** [Samson, Heather GPEB:EX](#)  
**Subject:** FW: GPEB Investigation s.15  
**Date:** Friday, December 8, 2017 1:39:56 PM  
**Attachments:** BCLC Letter 2017-12-08.doc

---

Hi Heather,  
You can include this letter into your file.  
Thanks,  
Richard

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Friday, December 8, 2017 1:38 PM  
**To:** 'JKarlovec@bclc.com'  
**Cc:** 'Daryl Tottenham'; Fitzgerald, Anna FIN:EX  
**Subject:** GPEB Investigation s.15

Hello John,

We are required under the GCA to advise BCLC of the results of an investigation if the request originated from BCLC. Please find attached a letter providing brief details of the investigation that resulted in cancelling the s.15,s.22  
s.15,s.22 This decision carries a thirty day appeal period that the individual is free to apply for.

If you would like to discuss further please do not hesitate to call.

Bob Stewart

Senior Regional Director  
Compliance Division, Lower Mainland  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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



**From:** [Akin, Richard GPEB:EX](#)  
**To:** [Samson, Heather GPEB:EX](#)  
**Subject:** RE: Investigation and Termination of Registration  
**Date:** Wednesday, December 6, 2017 12:59:38 PM

---

Thanks Heather,  
I'll review and sent it on. Appreciate it.  
Richard

---

**From:** Samson, Heather FIN:EX  
**Sent:** Wednesday, December 6, 2017 12:58 PM  
**To:** Akin, Richard FIN:EX  
**Subject:** RE: Investigation and Termination of Registration  
Hey Rich,  
Here are a few bullet points. Feel free to adjust as needed.  
s.13,s.15,s.22

Cheers,  
Heather

---

**From:** Akin, Richard FIN:EX  
**Sent:** Tuesday, December 5, 2017 8:15 AM  
**To:** Samson, Heather FIN:EX  
**Subject:** FW: Investigation and Termination of Registration

---

**From:** Fitzgerald, Anna FIN:EX  
**Sent:** Tuesday, December 5, 2017 8:04 AM  
**To:** Stewart, Robert A FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** Fwd: Investigation and Termination of Registration  
Hello Bob

Could I request that you and your team put together a few bullet points to the s.22 along  
the lines of,,  
s.13,s.22

Could I please ask this letter is drafted by Monday next week and the bullets completed in the next couple of days.

Thank you,  
Anna

Sent from my iPad

Begin forwarded message:

**From:** "Skrine, Cary J FIN:EX" <[Cary.Skrine@gov.bc.ca](mailto:Cary.Skrine@gov.bc.ca)>  
**Date:** December 1, 2017 at 7:54:28 PM PST  
**To:** "Mazure, John C FIN:EX" <[John.Mazure@gov.bc.ca](mailto:John.Mazure@gov.bc.ca)>, "Baillie, Garth E FIN:EX" <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)>  
**Cc:** "Fitzgerald, Anna FIN:EX" <[Anna.Fitzgerald@gov.bc.ca](mailto:Anna.Fitzgerald@gov.bc.ca)>, "Jaggi-Smith, Michele FIN:EX" <[Michele.JaggiSmith@gov.bc.ca](mailto:Michele.JaggiSmith@gov.bc.ca)>  
**Subject:** RE: Investigation and Termination of Registration

John,  
s.15.s.22

Cary

*Cary Skrine*

Regional Director  
Special Provincial Constable  
Compliance Division  
Gaming Policy & Enforcement Branch  
Ministry of the Attorney General  
#200 - 1517 Water St. Kelowna, BC V1Y 1J8  
Office (250) 861-5518 Fax (250) 861-7362  
Cell (250) 864-9550

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

---

**From:** Mazure, John C FIN:EX  
**Sent:** Friday, December 1, 2017 4:11 PM  
**To:** Skrine, Cary J FIN:EX; Baillie, Garth E FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX; Bruce, Kim M FIN:EX; Jaggi-Smith, Michele FIN:EX  
**Subject:** Investigation and Termination of Registration  
Cary/Garth, can the two of you provide me with a short description of the work supporting the decision earlier this week to terminate the registration of s. i. s.13



From: [Akin, Richard GPEB:EX](#)  
To: [Skrine, Cary J GPEB:EX](#); [Kowalewich, Richard GPEB:EX](#)  
Cc: [Samson, Heather GPEB:EX](#)  
Subject: s.15 and Registration Decision  
Date: Friday, December 1, 2017 10:46:51 AM  
Attachments: s.15,s.22

---

Hey Cary and Richard,

The attached documents that were briefly discussed at yesterday's meeting for your perusal. Also attached is the PowerPoint that we used to brief John Mazure.

Cheers,

Richard

Investigator, Special Provincial Constable #917

Gaming Policy and Enforcement Branch

Ministry of Attorney General

408 – 4603 Kingsway Avenue

Burnaby, BC V5H 4M4

Direct Line: (604) 660-2034

Mobile s.17

Fax: (604) 660-2333

Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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

From: [Mazure, John C FIN:EX](#)  
To: [Akin, Richard FIN:EX](#)  
Cc: [Fitzgerald, Anna FIN:EX](#); [Stewart, Robert A FIN:EX](#); [Samson, Heather FIN:EX](#)  
Subject: Re: [s.15 s.22](#)  
Date: Wednesday, November 29, 2017 4:41:39 PM

---

Thx Richard.

Sent from my iPhone

On Nov 29, 2017, at 2:54 PM, Akin, Richard FIN:EX <[richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)> wrote:

Sir,

Here is the Report of Findings final report and the Registration decision for your perusal.

Richard

Investigator, Special Provincial Constable #917  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General  
408 – 4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Direct Line: (604) 660-2034  
Mobile: [s.17](#)  
Fax: (604) 660-2333  
Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)<<mailto:richard.akin@gov.bc.ca>>

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

[s.15](#)      [Report of Findings s.22](#)      [.PDF>](#)

From: [Akin, Richard FIN:EX](#)  
To: [Knight, Chris W FIN:EX](#)  
Cc: [Samson, Heather FIN:EX](#)  
Subject: GPEB **s.15.s.2**  
Date: Wednesday, November 29, 2017 2:56:59 PM  
Attachments: **s.15,s.22**

---

Hey Chris,

Thanks for your kind remarks. Both Heather and I appreciate it. If you're interested, here are the main reports for your perusal.

Richard

Investigator, Special Provincial Constable #917

Gaming Policy and Enforcement Branch

Ministry of Attorney General

408 – 4603 Kingsway Avenue

Burnaby, BC V5H 4M4


Direct Line: (604) 660-2034

Mobile: s.17

Fax: (604) 660-2333

Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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

**From:** Baillie, Garth E FIN:EX  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** RE:   
**Date:** Friday, November 24, 2017 10:13:55 AM

---


Thanks Heather – I have just been in correspondence with Richard Grimes the HR Manager at the River Rock and he confirmed as well. He acknowledged the cancelled registration just seconds ago.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Friday, November 24, 2017 10:12 AM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Akin, Richard FIN:EX  
**Subject:** RE: 

Hi Garth,

I have confirmed with the RRCR that s.22 ; address is what is listed in GOS and as listed on the decision s.22

Cheers,

Heather Samson

Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: (s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Friday, November 24, 2017 9:12 AM  
**To:** Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX  
**Cc:** Fitzgerald, Anna FIN:EX  
**Subject:** RE: s.22

Hi

Thanks Heather and Richard for a very through and well documented investigation. Great job you two.

Heather I have attached a copy of the decision that will be going out in the mail today.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

*email from your mailbox.*

---

**From:** Samson, Heather FIN:EX

**Sent:** Friday, November 24, 2017 8:57 AM

**To:** Baillie, Garth E FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX

**Subject:** RE:s.22

Good Morning Garth,

Rich and I have read through the attached and we have no issues regarding content. I did highlight a few words in yellow for your review as there might be the odd spelling mistake or missing word (I think the word "policy" is missing in the third highlighted section).

Cheers,

Heather

---

**From:** Baillie, Garth E FIN:EX

**Sent:** Thursday, November 23, 2017 2:57 PM

**To:** Samson, Heather FIN:EX; Akin, Richard FIN:EX; Stewart, Robert A FIN:EX

**Subject:** s 2

Hi Richard

I have made some spelling corrections and reworked a couple of the last paragraphs for your review tomorrow.

*Garth Baillie*

Director, Deputy Registrar

Personnel Registration

Gaming Policy and Enforcement Branch

Direct phone (250) 356-0983

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



**From:** Baillie, Garth E FIN:EX  
**To:** Stewart, Robert A FIN:EX; Samson, Heather FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE: **s.15,s.22**  
**Date:** Thursday, November 23, 2017 12:21:10 PM  
**Attachments:** **s.22**

---

Good Day

Please find attached my decision in regards to **s.22** for comment or concern with regards to the considerable information that you gathered during this investigation.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Stewart, Robert A FIN:EX  
**Sent:** Wednesday, November 8, 2017 2:56 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** FW: **s.15,s.22**  
Hello Garth,


Please find attached the Report of Findings regarding the investigation into the RRCR and **s.22**

**s.22** Please call to discuss after you have reviewed the document. I believe we should forward a copy of this to Robin Jomha, Director of Corporate Registration, once you have had a chance look at it.

Thanks

Bob Stewart  
Manager, Intelligence Unit &  
Lower Mainland Investigations  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-0271

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

From: [Akin, Richard FIN:EX](#)  
To: [Baillie, Garth E FIN:EX](#)  
Cc: [Samson, Heather FIN:EX](#)  
Subject: FW:   
Date: Wednesday, November 22, 2017 9:00:14 AM  
Attachments: s.22

---

Hi Garth,

s.22 I have located the following documents for your perusal. I don't believe we have the actual copy of s.22


The attached email contains information within the 'Word' document that on s.22

s.22



Richard  
Investigator, Special Provincial Constable #917  
Gaming Policy and Enforcement Branch  
Ministry of Attorney General  
408 – 4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Direct Line: (604) 660-2034  
Mobile: s.17  
Fax: (604) 660-2333  
Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Tuesday, November 21, 2017 4:14 PM  
**To:** Akin, Richard FIN:EX  
**Subject:** Fwd:   
Hey Rich,


As s.22 , I thought I'd flip this your way. I believe s.22

s.22  The open source doc might also specify. Everything should be on the N drive under my name in the post reg file for 

Cheers,  
Heather

Sent from my iPhone

Begin forwarded message:

**From:** "Baillie, Garth E FIN:EX" <[Garth.Baillie@gov.bc.ca](mailto:Garth.Baillie@gov.bc.ca)>  
**Date:** November 21, 2017 at 3:21:55 PM PST  
**To:** "Samson, Heather FIN:EX" <[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)>, "Stewart, Robert A FIN:EX" <[Bob.Stewart@gov.bc.ca](mailto:Bob.Stewart@gov.bc.ca)>  
**Subject:** 

Good Afternoon

I am wondering if it is possible for you to send me a copy of the s.22  
s.22

*Garth Baillie*

Director, Deputy Registrar

Personnel Registration

Gaming Policy and Enforcement Branch

Direct phone (250) 356-0983

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

From: [Samson, Heather FIN:EX](#)  
To: ["Patrick Ennis"; "mkim@riverrock.com"](#)  
Cc: [Akin, Richard FIN:EX](#)  
Subject: GPEB investigation & ?  
Date: Tuesday, November 21, 2017 10:37:00 AM

---

Hello Gentlemen,

Please be advised that we have completed our investigation into s.13,s.15,s.22  
s.13,s.15,s.22

Thank you for your assistance and cooperation.

Sincerely,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

Heather.Samson@gov.bc.ca

**From:** Baillie, Garth E FIN:EX  
**To:** Samson, Heather FIN:EX  
**Cc:** Stewart, Robert A FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE: Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
**Date:** Friday, November 17, 2017 7:19:41 AM

---

Thanks Heather – I have looked at these sections online yesterday and just wanted to be sure I was looking at the same information as you had been. Much appreciated.

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Samson, Heather FIN:EX  
**Sent:** Friday, November 17, 2017 6:24 AM  
**To:** Baillie, Garth E FIN:EX  
**Cc:** Stewart, Robert A FIN:EX; Akin, Richard FIN:EX  
**Subject:** RE: Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
Morning Garth,

s.13,s.22

I've CC'd Bob and Richard just to ensure that everyone has been looped in to my response.  
I hope the above is helpful. If you have any further questions or concerns, please do not hesitate to get in touch.

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: S.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Thursday, November 16, 2017 2:54 PM  
**To:** Samson, Heather FIN:EX  
**Subject:** Proceeds of Crime (Money Laundering) & Terrorist Financing Act  
Hi Heather

Do you or can you direct me to the sections of the Act and regulations that we are dealing with?

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

**From:** GPEBSec86Req  
**To:** [Samson, Heather FIN:EX; GPEBSec86Req](#)  
**Subject:** RE: Section 86 Demand re: s.15  
**Date:** Wednesday, October 25, 2017 10:32:34 AM

---

Good morning Heather,

The file s.15 ) has been uploaded to the SFTP site under LMD Region under your name. The first page of this file shows the date s.22 completed the BCLC AML training course. Please refer to page 47 in the document for the slide referring to 3rd Party Transactions.

If you need anything further please let us know.

Thanks,

Andrea

Andrea Nicholls

AML Assistant

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6 T 604 225 6278

---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** October 24, 2017 12:32 PM

**To:** GPEBSec86Req

**Subject:** Section 86 Demand re: s.15

Please see attached.

Thank you.

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

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**From:** [Akin, Richard FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** FW: s.15  
**Date:** Tuesday, October 24, 2017 11:47:57 AM  
**Attachments:** Casino Patron Sexual Assault Incident - s.15 docx

---

**From:** Mulcahy, William FIN:EX  
**Sent:** Friday, March 4, 2016 9:14 AM  
**To:** Ackles, Ken FIN:EX; Barber, Rob FIN:EX; Dickson, Derek FIN:EX  
**Subject:** FW: s.15

Garth has forwarded the report that registration received  
Bill Mulcahy

s.17 (cell)  
604-660-0271 (desk)  
[William.Mulcahy@gov.bc.ca](mailto:William.Mulcahy@gov.bc.ca)

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---

**From:** Baillie, Garth E FIN:EX  
**Sent:** Friday, March 4, 2016 9:09 AM  
**To:** Mulcahy, William FIN:EX  
**Subject:** FW: s.15  
FYI

*Garth Baillie*

Director, Deputy Registrar  
Personnel Registration  
Gaming Policy and Enforcement Branch  
Direct phone (250) 356-0983

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

---

**From:** Swan, Angela FIN:EX  
**Sent:** Tuesday, March 1, 2016 4:29 PM  
**To:** Baillie, Garth E FIN:EX  
**Subject:** FW: s.15  
Hi Garth,

I just received a call from Ross Alderson at BCLC regarding an incident that we should look into. You may already be aware of this incident. BCLC's report is attached. Can you please review the actions of the s.15,s.22 If you need any further information, please contact Ross Alderson. We should also be able to obtain a copy of the section 86 report from Len's team.  
Call or text me on my cell if you want to chat further.

Thanks,

*Ang*

---

**From:** Ross Alderson [<mailto:RAlderson@BCLC.com>]  
**Sent:** Tuesday, March 1, 2016 4:20 PM  
**To:** Swan, Angela FIN:EX  
**Subject:** s.15

As discussed,

Section 86 was submitted however I believe there are some possible registration concerns here as well.



**Regards**

Ross Alderson CAMS

Director, AML & Operational Analysis

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

T 604 225 6382 C s.17 F 604 225 6488

[ralderson@bcl.com](mailto:ralderson@bcl.com)

---

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Page 19 to/à Page 20

Withheld pursuant to/removed as

s.22;s.21

Sent from my iPhone

Begin forwarded message:

**From:** Bal Bamra <BBamra@BCLC.com>  
**Date:** June 15, 2017 at 12:42:52 PM CST  
**To:** Terrance Doyle <tdoyle@gcgaming.com>, "Jag Nijjar (jnijjar@gatewaycasinos.com)" <jnijjar@gatewaycasinos.com>, "tsanto@gatewaycasinos.com" <tsanto@gatewaycasinos.com>, "bstewart@gatewaycasinos.com" <bstewart@gatewaycasinos.com>, "Joe Brunini (jbrunini@edgewatercasino.ca)" <jbrunini@edgewatercasino.ca>, Paul Ahluwalia <pahluwalia@edgewatercasino.ca>, "mmajor@treasurecovecasino.com" <mmajor@treasurecovecasino.com>, "bkotzer@billybarkercasino.com" <bkotzer@billybarkercasino.com>, "svansteijn@steugene.ca" <svansteijn@steugene.ca>, "susan.merivirta@coulsongroup.com" <susan.merivirta@coulsongroup.com>, Troy Berezanhg <troyb@berezanhg.com>, s.22  
s.22  
"jeffh@pomeroylodging.com" <jeffh@pomeroylodging.com>, "brunob@pomeroylodging.com" <brunob@pomeroylodging.com>, "pathart@chanceskamloops.com" <pathart@chanceskamloops.com>, CGC- Chances Kelowna <swalt@chanceskelowna.ca>, s.22  
>, Nancy Robertson <nrobertson@chancescowichan.ca>, Lynn Peachey <manager@harbourcitybingo.com>, Glenn Atchison <gatchison@gatewaycasinos.com>, Shauna Gillespie <sgillespie@gcgaming.com>, Krissy Wong <kwong@riverrock.com>, "Phuong Waldner (pwaldner@edgewatercasino.ca)" <pwaldner@edgewatercasino.ca>, "fcorlis@edgewatercasino.ca" <fcorlis@edgewatercasino.ca>, Patrick Ennis <pennis@gcgaming.com>  
**Cc:** Laurie Stewart <LStewart@BCLC.com>, Tom Maryschak <TMaryschak@BCLC.com>  
**Subject:** RE: BCLC Directive

Hi Everyone,  
Please use the amended template.  
Thanks,

**Bal Bamra** [B.Com](mailto:BBamra@BCLC.com), CAMS  
Manager, AML Intelligence  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 228 3113 C s.17

●**Yes, and...**●

[bbamra@bclc.com](mailto:bbamra@bclc.com)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

---

**From:** Bal Bamra

**Sent:** June-15-17 10:09 AM

**To:** [tdoyle@gcgaming.com](mailto:tdoyle@gcgaming.com); Jag Nijjar ([jnijjar@gatewaycasinos.com](mailto:jnijjar@gatewaycasinos.com))

<[jnijjar@gatewaycasinos.com](mailto:jnijjar@gatewaycasinos.com)>; [tsanto@gatewaycasinos.com](mailto:tsanto@gatewaycasinos.com);

[bstewart@gatewaycasinos.com](mailto:bstewart@gatewaycasinos.com); Joe Brunini

([jbrunini@edgewatercasino.ca](mailto:jbrunini@edgewatercasino.ca)) <[jbrunini@edgewatercasino.ca](mailto:jbrunini@edgewatercasino.ca)>; Paul

Ahluwalia <[pahluwalia@edgewatercasino.ca](mailto:pahluwalia@edgewatercasino.ca)>;

[mmajor@treasurecovecasino.com](mailto:mmajor@treasurecovecasino.com); [bkotzer@billybarkercasino.com](mailto:bkotzer@billybarkercasino.com);

[svansteijn@steugene.ca](mailto:svansteijn@steugene.ca); [susan.merivirta@coulsongroup.com](mailto:susan.merivirta@coulsongroup.com); Troy

Berezanhg <[troyb@berezanhg.com](mailto:troyb@berezanhg.com)>; s.22

s.22 [jeffh@pomeroylodging.com](mailto:jeffh@pomeroylodging.com);

[brunob@pomeroylodging.com](mailto:brunob@pomeroylodging.com); [pathart@chanceskamloops.com](mailto:pathart@chanceskamloops.com); CGC-

Chances Kelowna <[swalt@chanceskelowna.ca](mailto:swalt@chanceskelowna.ca)>;

s.22 ; Nancy Robertson

<[nrobertson@chancescowichan.ca](mailto:nrobertson@chancescowichan.ca)>; Lynn Peachey

<[manager@harbourcitybingo.com](mailto:manager@harbourcitybingo.com)>; Glenn Atchison

<[gatchison@gatewaycasinos.com](mailto:gatchison@gatewaycasinos.com)>; Shauna Gillespie

<[sgillespie@gcgaming.com](mailto:sgillespie@gcgaming.com)>; Krissy Wong ([kwong@riverrock.com](mailto:kwong@riverrock.com))

<[kwong@riverrock.com](mailto:kwong@riverrock.com)>; Phuong Waldner

([pwaldner@edgewatercasino.ca](mailto:pwaldner@edgewatercasino.ca)) <[pwaldner@edgewatercasino.ca](mailto:pwaldner@edgewatercasino.ca)>;

[fcorlis@edgewatercasino.ca](mailto:fcorlis@edgewatercasino.ca); [pennis@gcgaming.com](mailto:pennis@gcgaming.com)

**Cc:** Laurie Stewart <[LStewart@BCLC.com](mailto:LStewart@BCLC.com)>; Tom Maryschak

<[TMaryschak@BCLC.com](mailto:TMaryschak@BCLC.com)>; All- Investigators <[All-Investigators@bclc.com](mailto:All-Investigators@bclc.com)>;

[BonnieArmand@BCLC.com](mailto:BonnieArmand@BCLC.com)>; Kris

Gade <[KGade@BCLC.com](mailto:KGade@BCLC.com)>; Bruno Gatto <[BGatto@bclc.com](mailto:BGatto@bclc.com)>; Bill Boyd

<[BBoyd@BCLC.com](mailto:BBoyd@BCLC.com)>; Laird Robinson <[LRobinson@BCLC.com](mailto:LRobinson@BCLC.com)>; Daryl

Tottenham <[DTottenham@BCLC.com](mailto:DTottenham@BCLC.com)>; Ross Alderson

<[RAlderson@BCLC.com](mailto:RAlderson@BCLC.com)>; Bal Bamra <[BBamra@BCLC.com](mailto:BBamra@BCLC.com)>

**Subject:** BCLC Directive

Hi Everyone,

Please find attached BCLC Directive on FINTRAC Amendments that should be implemented at all sites effective June 17, 2017.

Should you have any questions, please send them to myself and we will get a Q&A document out to everyone shortly after.

Policy will be amended as required.

Please forward on to your sites and anyone else that I may have missed in this distribution.

Thank you,

Bal Bamra [B.Com](#), CAMS

Manager, AML Intelligence

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

T 604 228 3113 C\$17

●***Yes, and...***●

[bbamra@bclc.com](mailto:bbamra@bclc.com)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

---

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**From:** [Ackles, Ken FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
**Subject:** Re: **s.15,s.22**  
**Date:** Thursday, October 19, 2017 5:24:37 PM

---

No problem Heather s.13

Sent from my BlackBerry 10 smartphone on the Rogers network.

---

**From:** Samson, Heather FIN:EX  
**Sent:** Thursday, October 19, 2017 12:59 PM  
**To:** Akin, Richard FIN:EX; Ackles, Ken FIN:EX  
**Subject:** s.15,s.22

---

Hi Ken,  
s.13,s.15,s.16,s.22

Cheers,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

From: [Stenerson, Laurin P FIN:EX](#)  
To: [Samson, Heather FIN:EX](#)  
Subject: **s.15.s.22**  
Date: Thursday, October 19, 2017 10:52:44 AM  
Attachments: **s.15,s.22**

---

**From:** Patrick Ennis  
**To:** [Samson, Heather FIN:EX](#)  
**Cc:** [Akin, Richard FIN:EX](#)  
**Subject:** RE: Section 86(1) Demand re: s.15  
**Date:** Thursday, October 19, 2017 8:28:49 AM

---

No problem. I will get them started on gathering everything up for you today.

---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** Thursday, October 19, 2017 7:10 AM

**To:** Patrick Ennis

**Cc:** Akin, Richard FIN:EX

**Subject:** Section 86(1) Demand re: s.15

Good Morning Pat,

Please see attached 86(1) Demand. The intention always was to send in the request, we just wanted to ascertain who would be the best person to direct it to.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

s.15,s.21,s.22



s.21,s.22

Begin forwarded message:

**From:** "Samson, Heather FIN:EX" <[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)>  
**Date:** October 18, 2017 at 13:23:26 PDT  
**To:** 'Michael Kim' <[mkim@riverrock.com](mailto:mkim@riverrock.com)>  
**Cc:** "Akin, Richard FIN:EX" <[richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)>  
**Subject:** RE: Meeting with GPEB

Hi Michael,

Thanks again for finding time to talk with us today.

Further to our conversation, would you be able to provide any of the following information or provide the best person to talk to in order to get the following information:

s.15,s.22

Thank you,

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

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Withheld pursuant to/removed as

s.22;s.15;s.21

Page 29

Withheld pursuant to/removed as

s.22;s.15;s.21;s.17

Page 30 to/à Page 31

Withheld pursuant to/removed as

s.22;s.21

From: Patrick Ennis  
To: Samson, Heather FIN:EX  
Subject: Re: Section 86 Request  
Date: Monday, October 16, 2017 8:39:34 AM

---

s.15,s.22

Pat

On Oct 16, 2017, at 8:32 AM, Samson, Heather FIN:EX  
<Heather.Samson@gov.bc.ca<<mailto:Heather.Samson@gov.bc.ca>>> wrote:

Good Morning Pat,

Just following up on the 86 demand we discussed on Thursday. Did the request come through?

Cheers,

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: **s.17**  
Heather.Samson@gov.bc.ca<<mailto:Heather.Samson@gov.bc.ca>>

-----  
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From: GPEBSec86Req  
To: [Samson, Heather FIN:EX; GPEBSec86Req](#)  
Cc: [Akin, Richard FIN:EX](#)  
Subject: RE: **s.15** RE: Section 86 Demand  
Date: Friday, October 13, 2017 9:10:36 AM

---

Good morning Heather,

As requested, **s.15** has been revised to include the additional documents from the chip swap project detailing each instance where **s.22**. The revised file **s.15**  
**s.15** has been uploaded to the SFTP site under **s.15**

If you need anything further please let us know.

Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 225 6278

-----Original Message-----

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 3:12 PM  
To: GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)>  
Subject: Re: **s.15** RE: Section 86 Demand

Hi Andrea,

Yes, I would like copies of the supplemental reports (any that have not already been provided as part of **s.15**  
**s.15,s.22**

Thanks again. Appreciate the assistance.

Cheers,  
Heather

Sent from my iPhone

On Oct 12, 2017, at 2:42 PM, GPEBSec86Req  
<[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>> wrote:

Hi Heather,

I heard back from the Investigators and they advised that when it comes to patron interviews BCLC rarely, if ever uses anyone from the casino as a translator. The only instance they could recall is when we did the **s.15** project at RRCR in early 2016. **s.22** along with other guest services reps would have likely translated for BCLC investigators in some of those instances.

Please let me know if you would like copies of the supplemental reports in which **s.22**

Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6 T 604 225 6278

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

anicholls@bclc.com<<mailto:anicholls@bclc.com>>

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Blog<<http://blogs.bclc.com/>> | bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 1:49 PM  
To: Andrea Nicholls <[ANicholls@bclc.com](mailto:ANicholls@bclc.com)<<mailto:ANicholls@bclc.com>>>; GPEBSec86Req  
<[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: RE: s.15 RE: Section 86 Demand

Hi Andrea,

Quick question. It wasn't clear from the disclosure document, is this the only document where s. 22 appears as translator? Are there any other Intelligence Summaries or Interview Summaries that are in BCLC's possession that feature s. 22 that we haven't already received?

Thank you.

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

From: Andrea Nicholls [<mailto:ANicholls@bclc.com>]  
Sent: Thursday, October 12, 2017 1:36 PM  
To: Samson, Heather FIN:EX; GPEBSec86Req  
Cc: Akin, Richard FIN:EX  
Subject: RE: s.15 RE: Section 86 Demand

Good afternoon Heather,

The file has been uploaded to the SFTP site under s.15

s.15

Let us know if you require anything further.

Thanks,  
Andrea

Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6 T 604 225 6278

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

anicholls@bclc.com<<mailto:anicholls@bclc.com>>

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Blog<<http://blogs.bclc.com/>> | bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: October 12, 2017 11:35 AM  
To: GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: RE: s.15 RE: Section 86 Demand

Hello Evonne,

It has come to my attention that a document exists from September 2015 (it may be referred to as a BCLC Interview Intelligence Summary) wherein s.22 acted as a s.22 for the interview. I believe the BCLC investigator listed on the document was Brad DESMERAIS and the interview also included the GCGC CEO (Rob Baker) and COO (Terrence DOYLE).

As part of the most recent disclosure, could I please get a copy of the above noted document in addition to any other document / Intelligence Interview Summary not already provided where s.22 ?

Thanks for all you help.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

From: GPEBSec86Req [<mailto:GPEBLotterySec86@bclc.com>]  
Sent: Wednesday, October 11, 2017 5:44 PM



To: Samson, Heather FIN:EX; GPEBSec86Req  
Cc: Akin, Richard FIN:EX  
Subject: s.15 RE: Section 86 Demand

Hi Heather,

The file has been uploaded to the SFTP site under s.15 under your name. It is called s.15  
s.15

Let me know if you require anything else.

Thanks,  
et

Evonne Tang  
Administrative Assistant  
Corporate Security and Compliance, BCLC

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

T 604 225 6403 F 604 225 6488

E etang@bclc.com<<mailto:etang@bclc.com>>

•Yes, and...•<<http://yak.bclc.com/Page8299.aspx>>

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bclc.com<<http://www.bclc.com/>>

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

From: Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
Sent: Tuesday, October 10, 2017 10:56 AM  
To: GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)<<mailto:GPEBLotterySec86@bclc.com>>>  
Cc: Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)<<mailto:Richard.akin@gov.bc.ca>>>  
Subject: Section 86 Demand

Please see attached.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney  
General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)<<mailto:Heather.Samson@gov.bc.ca>>

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Page 38

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s.22;s.15

Page 39

Withheld pursuant to/removed as

s.22;s.15;s.17

From: [McGregor, Scott FIN:EX](#)  
To: [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
Cc: [Stewart, Robert A FIN:EX](#)  
Subject: s.15,s.22  
Date: Thursday, October 12, 2017 8:53:30 AM  
Attachments: s.15,s.22

---

All,

This document was shared by the RCMP with GPEB as it relates to the Integrity of Gaming and the Gaming Control Act.

This sharing of information was conducted in accordance with the protocols set out for LE to LE sharing with the intention of providing Intelligence which enhances situational awareness.

V/R

Scott McGregor  
GPEB Intel Unit

Page 41

Withheld pursuant to/removed as

s.16;s.17

**From:** GPEBSec86Req  
**To:** [Samson, Heather FIN:EX; GPEBSec86Req](#)  
**Subject:** RE: Section 86 Demand  
**Date:** Tuesday, October 10, 2017 1:12:00 PM

---

Hi Heather,  
I understand that Steve has replied to you in regards to this already. Do you still need anything else for this portion?  
Thanks,  
et

---

**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]  
**Sent:** Tuesday, October 10, 2017 11:05 AM  
**To:** GPEBSec86Req  
**Subject:** RE: Section 86 Demand

Hi Evonne,  
Thank you for the upload. One piece of info that I need that doesn't seem to be on the documents is who is the owner of VVIP account s.22 (i.e. who is the person that the account is registered to)?

Thanks again,  
Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** GPEBSec86Req [<mailto:GPEBLotterySec86@bclc.com>]  
**Sent:** Tuesday, October 10, 2017 10:55 AM  
**To:** Samson, Heather FIN:EX; GPEBSec86Req  
**Subject:** RE: Section 86 Demand

Hi Heather,  
The file has been uploaded to the SFTP. It is called s.15  
Let me know if you require anything else.  
Thanks,  
et

**Evonne Tang**  
Administrative Assistant  
Corporate Security and Compliance, BCLC  
BCLC, 2940 Virtual Way, Vancouver, BC V5M 0A6  
T 604 225 6403 F 604 225 6488  
E [etang@bclc.com](mailto:etang@bclc.com)

**●Yes, and...●**

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---

**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]

**Sent:** Wednesday, October 04, 2017 11:20 AM  
**To:** GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)>  
**Subject:** RE: Section 86 Demand

Hi Andrea,

I have no issue with you reaching out to BCLC Casino Operations in order to get this information.  
Thanks.

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** GPEBSec86Req [<mailto:GPEBLotterySec86@bclc.com>]

**Sent:** Wednesday, October 4, 2017 11:12 AM

**To:** Samson, Heather FIN:EX

**Subject:** RE: Section 86 Demand

Hi Heather,

I've asked the AML Investigators to provide the information you requested, however they do not have access to these files. As this may be a sensitive GPEB investigation, they asked me to check with you if it would be ok to ask BCLC Casino Operations if they have this information.

Thanks,

Andrea

Andrea Nicholls

AML Assistant

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

T 604 225 6278

●**Yes, and...**●

[anicholls@bclc.com](mailto:anicholls@bclc.com)

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---

**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]

**Sent:** October 3, 2017 1:34 PM

**To:** GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)>

**Subject:** Section 86 Demand

Please see attached.

Thank you.

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch



Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: 604-660-5177  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

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**From:** Steve Beeksma  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** RE: Encore records request.  
**Date:** Tuesday, October 10, 2017 11:15:19 AM

---

Sorry Heather but I'm not sure how the VVIP system works.

Thanks,

**Steve Beeksma**

Casino Investigations  
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 207 0826 C s.17

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

---

**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]

**Sent:** October-10-17 11:12 AM

**To:** Steve Beeksma

**Subject:** RE: Encore records request.

Hi Steve,

Thanks for the quick reply. Another quick question for you. If [s.1](#) is a new SID with no history at the casino per se, how would [s.1](#) qualify for a VVIP account? I was under the impression that certain criteria need to be met before VIP status would be granted.

Cheers,

Heather

---

**From:** Steve Beeksma [<mailto:SBeeksma@BCLC.com>]

**Sent:** Tuesday, October 10, 2017 11:09 AM

**To:** Samson, Heather FIN:EX

**Subject:** Encore records request.

Good morning Heather,

I'm told the most recent information you requested in relation to VVIP/Encore rewards was provided by BCLC's Manager of Business Operations (Don Chow) is in the secure drive.

The VVIP account number requested is linked to [s.22](#)

Thanks,

**Steve Beeksma**

Casino Investigations  
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 207 0826 C s.17

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**From:** [Stenerson, Laurin P FIN:EX](#)  
**To:** [Akin, Richard FIN:EX](#); [Samson, Heather FIN:EX](#)  
**Subject:** Fw: Further Assistance  
**Date:** Thursday, October 5, 2017 6:34:16 PM

---

Sent from my BlackBerry 10 smartphone on the TELUS network.

---

**From:** Richard Grimes  
**Sent:** Thursday, October 5, 2017 6:27 PM  
**To:** Stenerson, Laurin P FIN:EX  
**Subject:** RE: Further Assistance

---

Hi Laurin,  
This is her cell number <sup>s.17</sup>  
s.15,s.22

---

**From:** Stenerson, Laurin P FIN:EX [<mailto:Laurin.Stenerson@gov.bc.ca>]  
**Sent:** Thursday, October 05, 2017 8:30 AM  
**To:** Richard Grimes  
**Subject:** RE: Further Assistance

Richard:

Are you able to provide a work cell number or any other contact information for s.22 as we would like to arrange an interview with s.2

Thank you  
Laurin

---

**From:** Richard Grimes [<mailto:rgrimes@riverrock.com>]  
**Sent:** Wednesday, October 4, 2017 5:00 PM  
**To:** Stenerson, Laurin P FIN:EX; Baljit Sajan  
**Subject:** RE: Further Assistance

Hi Laurin,  
Please see the attached JD as per your request.  
Please see the below to answer your questions.  
I hope this meets your needs!  
Thank you.

---

**From:** Stenerson, Laurin P FIN:EX [<mailto:Laurin.Stenerson@gov.bc.ca>]  
**Sent:** Wednesday, October 04, 2017 11:26 AM  
**To:** Baljit Sajan  
**Subject:** FW: Further Assistance

Good morning Bal:

I was wondering when I can expect the below mentioned information as we plan on interviewing s.22 once we receive it .

Thank you  
Laurin

---

**From:** Stenerson, Laurin P FIN:EX  
**Sent:** Friday, September 29, 2017 10:12 AM  
**To:** 'Baljit Sajan'  
**Subject:** Further Assistance

Hi Bal:

Are you able to provide me with the following information:  
s.15,s.22

Your assistance is greatly appreciated  
Laurin Stenerson, Investigator  
Special Provincial Constable  
Ministry of Attorney General  
Gaming Policy and Enforcement Branch  
Compliance Division  
408-4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Cell: S.17  
[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)

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From: Stenerson, Laurin P FIN:EX  
To: Samson, Heather FIN:EX  
Date: Monday, October 2, 2017 1:52:09 PM  
Attachments: s 22

---

**From:** [Stenerson, Laurin P FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#)  
**Date:** Monday, October 2, 2017 1:51:48 PM  
**Attachments:** [Subject Detailed Report.pdf](#)

---

From: [Stenerson, Laurin P FIN:EX](#)  
To: [Samson, Heather FIN:EX](#)  
Subject: FW: s.15 : s.22  
Date: Monday, October 2, 2017 1:47:46 PM

---

From: Craig Longley [mailto:CLongley@bclc.com]  
Sent: Thursday, July 13, 2017 8:40 AM  
To: Stenerson, Laurin P FIN:EX  
Subject: s.15 s.22  
Laurin,

As per our discussion this morning, I've completed my investigation of this incident. Most of the findings were as expected. There was one interesting comment made by Director, VIP Guest Services s.22 stated she had to translate (written) for s.2 in regards to the cheque s.22 was writing to the valet. s.2 had to translate the number 2000 to English for the cheque.

Regards,

Craig Longley

Investigator

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver B.C. V5M 0A6

T 604 225 6430 C s.17

● Yes, and... ●

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From: [McGregor, Scott FIN:EX](#)  
To: [Samson, Heather FIN:EX](#)  
Subject: RE: Emailing: s.22 (For your records)  
Date: Friday, September 29, 2017 10:54:27 AM

---

Hi Heather,

This information is related to the Intelligence collection on the current file related to s.22 Information gleaned from internal databases, open sources, LE and partner agencies is used to provide situational awareness in an effort to enhance the understanding of networks suspected to be involved in criminal or illicit activity.

An Intelligence product is currently being worked on and will be provided in as timely a fashion as possible.

Kind regards,  
Scott

Scott A. McGregor, CD, BCom  
Special Provincial Constable / Senior Field Intelligence Analyst | GPEB Intel Unit  
British Columbia Ministry of the Attorney General | Gaming Policy Enforcement Branch – Compliance  
Suite 408, 4603 Kingsway Ave, Burnaby, BC, Canada | V5H 4M4  
Email: [scott.mcgregor@gov.bc.ca](mailto:scott.mcgregor@gov.bc.ca)  
Mobile: s.17  
Website: [www.gaming.gov.bc.ca](http://www.gaming.gov.bc.ca)

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-----Original Message-----

From: Samson, Heather FIN:EX  
Sent: Friday, September 29, 2017 10:46 AM  
To: McGregor, Scott FIN:EX; Akin, Richard FIN:EX  
Subject: RE: Emailing: s.22

Hey Scott,

Just to confirm, is this about the entities we were discussing in relation to the s.15,s.22 If so, can you advise how you came across this information (PDF)?

Cheers,

Heather Samson  
Investigator, Special Provincial Constable Gaming Policy and Enforcement Branch Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166

Cell: s.17

Heather.Samson@gov.bc.ca

-----Original Message-----

From: McGregor, Scott FIN:EX

Sent: Friday, September 29, 2017 10:30 AM

To: Samson, Heather FIN:EX; Akin, Richard FIN:EX

Subject: Emailing: s.22

Your message is ready to be sent with the following file or link attachments:

s.22

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**From:** [McGregor, Scott FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#); [Akin, Richard FIN:EX](#)  
**Subject:** Emailing: **s.22**  
**Date:** Friday, September 29, 2017 10:30:30 AM  
**Attachments:** **s.22**

---

Your message is ready to be sent with the following file or link attachments:

**s.22**

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

**From:** Steve Beeksma  
**To:** [Samson, Heather FIN:EX](#)  
**Cc:** [Akin, Richard FIN:EX](#); [Stone Lee](#)  
**Subject:** RE: GPEB: s.15  
**Date:** Thursday, September 28, 2017 2:33:36 PM

---

Hello Heather,

I've managed to locate the Chip Purchase Voucher (CPV) slip (that s.22 as well as the cage ledger of "large table buy ins" for the 13<sup>th</sup> that has the entry for s.22 buy in logged.

I've forwarded both to Andrea to have moved over to the secure drive for you. As soon as it is completed I will update you.

Thanks,

**Steve Beeksma**

Casino Investigations  
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 207 0826 · s.17

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---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** September-28-17 1:46 PM

**To:** Steve Beeksma

**Cc:** Richard Akin

**Subject:** GPEB:s.15

Hey Steve,

Thanks again for s.22

I'm hoping that you can help me get a copy of a couple more items in relation to the s. file.

We'd like to get copies of the Request Slip that gets filled out upon buy-in as well as copies of the receipts that were signed by s.2 etc at the table.

Basically I'm looking to get copies of any and all associated documents that were filled out in relation to the transaction.

Would this be something you'd be able to help out with?

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

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**From:** [Stenerson, Laurin P FIN:EX](#)  
**To:** [Akin, Richard FIN:EX](#); [Samson, Heather FIN:EX](#)  
**Subject:** FW: Work Schedule/ Position Description  
**Date:** Wednesday, September 27, 2017 12:17:27 PM  
**Attachments:** DRAFT Job Description - s.15,s.22 September 2017.pdf  
September Schedule.xlsx

---

Note that the job description was re-written this month.

---

**From:** Baljit Sajan [mailto:[bsajan@riverrock.com](mailto:bsajan@riverrock.com)]  
**Sent:** Wednesday, September 27, 2017 9:17 AM  
**To:** Stenerson, Laurin P FIN:EX  
**Subject:** RE: Work Schedule/ Position Description

Good Morning Laurin,

Please find attached the requested information.

Thanks and please let me know if you need anything further.

---

**From:** Stenerson, Laurin P FIN:EX [mailto:[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)]  
**Sent:** Tuesday, September 26, 2017 8:27 AM  
**To:** Baljit Sajan  
**Subject:** Work Schedule/ Position Description

Good morning Bal:

s.15,s.22

s.22

Thank you

Laurin Stenerson, Investigator  
Special Provincial Constable  
Ministry of Attorney General  
Gaming Policy and Enforcement Branch  
Compliance Division  
408-4603 Kingsway Avenue  
Burnaby, BC V5H 4M4  
Cell: s.17  
[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)

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From: Samson, Heather FIN:EX  
To: "Steve Beeksma"; "Stone Lee"  
Cc: Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX  
Subject: Interviews tomorrow  
Date: Monday, September 25, 2017 1:55:00 PM

---

Hi Guys,

In preparation for tomorrow, can I ask that you bring any correspondence that you've exchanged between yourselves and s.22 and s.17 (i.e. emails, text messages, etc).

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

Heather.Samson@gov.bc.ca

From: Steve Beeksma  
To: Samson, Heather FIN:EX; Stone Lee  
Cc: Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX  
Subject: Re: GPEB follow up Re: 1e  
Date: Friday, September 22, 2017 9:39:15 PM

---

Good evening Heather,

Yes, Daryl did give us a heads up. Tuesday morning will work for both of us.

Have a good weekend,

Steve Beeksma  
BCLC - Investigations.

Original Message

From: Samson, Heather FIN:EX  
Sent: Friday, September 22, 2017 9:11 PM  
To: Steve Beeksma; Stone Lee  
Cc: Richard Akin; Laurin Stenerson  
Subject: GPEB follow up Re: 67

s.15,s.22

Please confirm if the above times work for you both.

Cheers,

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603<tel:408-4603> Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166<tel:604-660-5166>

Cell: s.17

Heather.Samson@gov.bc.ca<<mailto:Heather.Samson@gov.bc.ca>>

Sent from my iPhone

---

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**From:** Steve Beeksma  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** RE: Reasonable Measures Form  
**Date:** Wednesday, September 20, 2017 2:36:45 PM

---

Yes, it was done for the chip redemption and to s.22

s.2

See attached,

**Steve Beeksma**

Casino Investigations  
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 207 0826 C s.17

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**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]

**Sent:** September-20-17 2:33 PM

**To:** Steve Beeksma

**Subject:** RE: Reasonable Measures Form

Hi again Steve,

Another question for you...

In your report when you mention s.22 chip return it states...

s.22 has agreed to attend RRRCR on 2017-SEP-16 and return the \$200,000 in chips purchased 2017-SEP-13. Please complete the disbursement paying cash (\$100 bills) and ensure to complete the Reasonable Measures form. Confirm with s. if the chips/funds are or are not s. if not s. make appropriate notation on Reasonable Measures form to include who the rightful owner of the funds is." Did this form get filled out upon the chip return? If so, is there a copy that can be sent my way?

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

**From:** Steve Beeksma [<mailto:SBeeksma@BCLC.com>]

**Sent:** Wednesday, September 20, 2017 10:25 AM

**To:** Samson, Heather FIN:EX

**Subject:** RE: Reasonable Measures Form

Hi Heather,

Happy to help out...anytime!

The PDF was provided by the cage manager upon my request (I imagine the scanner cut off the bottom), the full version was s.15 so I grabbed that for you (see attached). It is a JPEG however, hopefully that doesn't matter.

Regards,

**Steve Beeksma**



Casino Investigations  
BCLC, 2940 Virtual Way, Vancouver, BC, V5M 0A6  
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**From:** Samson, Heather FIN:EX [<mailto:Heather.Samson@gov.bc.ca>]

**Sent:** September-20-17 10:14 AM

**To:** Steve Beeksma <[SBeeksma@BCLC.com](mailto:SBeeksma@BCLC.com)>

**Subject:** Reasonable Measures Form

Hi Steve,

Thanks again for chatting with myself and Scott regarding the last buyin and forwarding the additional information my way.

I was reviewing the Reasonable Measures form and I noticed that the PDF provided is missing the bottom portion regarding why Reasonable Measures were unsuccessful and third party info (I've attached the template for reference). Would I be able to get a copy of the full Reasonable Measures form?

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: 604-222-2222

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

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**From:** [Akin, Richard FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** FW: BCLC Policies and Procedures related to updated 3rd Party/Reasonable Identity Measures and new FINTRAC rules  
**Date:** Wednesday, September 20, 2017 9:51:00 AM  
**Attachments:** FORM - Reasonable Measures Template - June 30, 2017.docx  
[BCLC Policy and Procedure LCT Section 3-8.1.xps](#)  
[June 29, 2017 FINTRAC 3rd Party Requirement.xps](#)

---

**From:** Storms, Timothy FIN:EX  
**Sent:** Tuesday, September 19, 2017 3:21 PM  
**To:** Akin, Richard FIN:EX  
**Cc:** Mayer, Douglas FIN:EX  
**Subject:** BCLC Policies and Procedures related to updated 3rd Party/Reasonable Identity Measures and new FINTRAC rules

Hey Richard, Doug mentioned to me you were looking for some info on the updates to 3<sup>rd</sup> Party reporting as part of FINTRAC that came into play in June/July 2017.

Here is what I have for you – give me a shout in the morning if you want to discuss further:

s.15

Sincerely,  
Tim Storms, CIA  
Gambling Auditor,  
Compliance Division

---

**Gaming Policy and Enforcement Branch**  
**Ministry of Attorney General**  
**Ste. 220-4370 Dominion Street**  
**Burnaby BC, V5G 4L7**  
**Tel: (604) 775-1163**  
**Fax: (604) 660-0267**  
**Email: [Timothy.Storms@gov.bc.ca](mailto:Timothy.Storms@gov.bc.ca)**

***Know your limit, play within it.***

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**From:** Stone Lee  
**To:** [Samson, Heather FIN:EX](#)  
**Subject:** RE: ID Question re: s.22  
**Date:** Tuesday, September 19, 2017 2:31:25 PM

---

Hi Heather,

The male is the private cage with Mr. s during the buy-in is an VIP services staff name s.15, s.15,s.22

Stone Lee

Casino Investigator

Corporate Security & Compliance, BCLC

2940 Virtual Way, Vancouver, B.C. V5M0A6

T 604 992-6399 F 604 255-6488

[slee@bclc.com](mailto:slee@bclc.com)

bclc.com

---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** September 19, 2017 2:25 PM

**To:** Stone Lee

**Subject:** ID Question re: s.15,s.22

Hi Stone,

Thanks again for meeting for coffee yesterday.

s.15,s.22

Cheers,

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

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**From:** [Akin, Richard FIN:EX](#)  
**To:** [Samson, Heather FIN:EX](#)  
**Cc:** [Stenerson, Laurin P FIN:EX](#)  
**Subject:** FW: Section 86(1) Demand  
**Date:** Saturday, September 16, 2017 9:06:52 AM  
**Attachments:** s.15

---

Hi Heather,  
Attached is the BCLC disclosure as per your 86(1) Request.  
Richard

---

**From:** GPEBSec86Req [mailto:[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)]  
**Sent:** Friday, September 15, 2017 4:14 PM  
**To:** Samson, Heather FIN:EX; GPEBSec86Req  
**Cc:** Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX; Bal Bamra  
**Subject:** RE: Section 86(1) Demand  
Hi Heather,

As requested, the document has been uploaded to the SFTP. It is called 's.15  
s.22

We've been advised that River Rock s.15 has already submitted the requested SID  
documents s.15

Thank you,  
Andrea Nicholls  
AML Assistant  
Corporate Security and Compliance Division, BCLC  
2940 Virtual Way, Vancouver, BC, V5M 0A6  
T 604 225 6278

● ***Yes, and...*** ●

[anicholls@bclc.com](mailto:anicholls@bclc.com)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]  
**Sent:** September 15, 2017 11:47 AM  
**To:** GPEBSec86Req <[GPEBLotterySec86@bclc.com](mailto:GPEBLotterySec86@bclc.com)>  
**Cc:** Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)>; Laurin Stenerson <[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)>  
**Subject:** Section 86(1) Demand

Please see attached request.

Thank you.

Heather Samson  
Investigator, Special Provincial Constable  
Gaming Policy and Enforcement Branch  
Ministry of the Attorney General  
#408-4603 Kingsway Avenue  
Burnaby, BC, V5H 4M4  
Office: 604-660-5166  
Cell: s.15  
[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

---

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From: Jack Dempsey  
To: [Samson, Heather FIN:EX; BCRRRC Surveillance Employees](#)  
Cc: [Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX](#)  
Subject: RE: Section 86(1) Demand  
Date: Friday, September 15, 2017 1:57:38 PM  
Attachments: [s.15.pdf](#)  
[s.22.pdf](#)

---

Please see attachments for INC file and Player Profile.

DVD is still under discussion.

Jack Dempsey

Surveillance Supervisor

River Rock Casino

[jdempsey@gccgaming.com](mailto:jdempsey@gccgaming.com)

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---

**From:** Samson, Heather FIN:EX [mailto:[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)]

**Sent:** Friday, September 15, 2017 11:46 AM

**To:** BCRRRC Surveillance Employees

**Cc:** Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX

**Subject:** Section 86(1) Demand

Please see attached request.

Thank you.

Heather Samson

Investigator, Special Provincial Constable

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-5166

Cell: s.17

[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)

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**From:** [Akin, Richard FIN:EX](#)  
**To:** "Daryl Tottenham"; [Stewart, Robert A FIN:EX](#)  
**Cc:** [Fitzgerald, Anna FIN:EX](#); [Ross Alderson](#); [Stenerson, Laurin P FIN:EX](#); [Samson, Heather FIN:EX](#); [Ackles, Ken FIN:EX](#)  
**Subject:** RE: RRCR issue re 3rd party buy in  
**Date:** Friday, September 15, 2017 12:31:23 PM

---

Hi Darryl,

Thanks for your assistance in the investigation. An 86 (1) has been sent today to BCLC under the File #s.15. All the documentation you have listed below and being gathered in your file can be downloaded to the secure server when available. Of interest to us is the s.15

s.15 and subsequent actions/or inactions by staff. My understanding is that Bob will be in touch and further discussions will ensue.

Thanks again,

Richard

Investigator, Special Provincial Constable #917

Gaming Policy and Enforcement Branch

Ministry of Attorney General

408 – 4603 Kingsway Avenue

Burnaby, BC V5H 4M4

Direct Line: (604) 660-2034

Mobile: s.17

Fax: (604) 660-2333

Email: [richard.akin@gov.bc.ca](mailto:richard.akin@gov.bc.ca)

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**From:** Daryl Tottenham [<mailto:DTottenham@BCLC.com>]

**Sent:** Friday, September 15, 2017 11:59 AM

**To:** Stewart, Robert A FIN:EX

**Cc:** Fitzgerald, Anna FIN:EX; Ross Alderson; Akin, Richard FIN:EX; Stenerson, Laurin P FIN:EX; Samson, Heather FIN:EX

**Subject:** RE: RRCR issue re 3rd party buy in

Hi Bob,

No problem, I am on days off but have been working all morning at home on-line and am available for a call whenever you have time. My cell is s.17

I will put together an outline and my concerns for this incident and send it your way. I have also had Steve create a file and download all statements to date, profiles, Reasonable measures form and the s.15 to date. I have also asked him to try and s.15

s.15 in regards to the buy-in process to determine if he was even asked at the cage about the ownership of funds which is a requirement by policy and Fintrac reporting guidelines. Steve had an opportunity to review s.15 and at this time it would appear that s.2 was never asked at buy-in and the RM form was filled out after the fact and falsified. This has not been confirmed but would be a serious violation with Fintrac reporting requirements if confirmed so the cage cashier will likely need to be interviewed by your investigators.

I am in the process of contacting Pat at RR as I suggested to him yesterday their first order of business should be contacting s.2 and requiring him to immediately return the chips to RR and document that process fully. It is our intention to interview him when (if) he returns with the chips and it would be a good idea to have your investigators either sit in on the interview or conduct the interview if you prefer. If they are unavailable we will have a hard

copy of the interview and make it available for your team.  
Shout me at any time on cell if you have questions, synopsis to follow shortly.  
Daryl

Daryl Tottenham Ba, CAMS

Manager, AML Programs

Corporate Security & Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC V5M 0A6

C s.17

[dtottenham@bclc.com](mailto:dtottenham@bclc.com)

● **Yes, and...** ●

Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups in B.C.

---

**From:** Stewart, Robert A FIN:EX [<mailto:Bob.Stewart@gov.bc.ca>]

**Sent:** Friday, September 15, 2017 10:40 AM

**To:** Daryl Tottenham <[DTottenham@BCLC.com](mailto:DTottenham@BCLC.com)>

**Cc:** Anna Fitzgerald <[anna.fitzgerald@gov.bc.ca](mailto:anna.fitzgerald@gov.bc.ca)>; Ross Alderson <[RAlderson@BCLC.com](mailto:RAlderson@BCLC.com)>; Richard Akin <[Richard.akin@gov.bc.ca](mailto:Richard.akin@gov.bc.ca)>; Laurin Stenerson <[Laurin.Stenerson@gov.bc.ca](mailto:Laurin.Stenerson@gov.bc.ca)>; Samson, Heather FIN:EX <[Heather.Samson@gov.bc.ca](mailto:Heather.Samson@gov.bc.ca)>

**Subject:** FW: RRCR issue re 3rd party buy in

**Importance:** High

Hello Daryl,

As per the e-mail chain be advised that we will conduct an investigation in relation to this and I have assigned Laurin Stenerson and Heather Samson with oversight from our Lead Investigator Rich Akin. BCLC and RRCR will soon be receiving Section 86 Demands for information related to this event.

If you have time this afternoon I would like to give you a phone call to further discuss. In the meantime, and as a start to the investigation, it would be appreciated if you could send me an e-mail outlining the specific compliance and policy breaches that you feel occurred here. I think it is important that both GPEB and BCLC share the same expectation as to what is going to be investigated. We can discuss more on the phone but if you could provide reference documentation that would be helpful.

Would you be available this afternoon between 1300 and 1500?

Thank you,

Bob Stewart

Manager, Intelligence Unit &

Lower Mainland Investigations

Gaming Policy and Enforcement Branch

Ministry of the Attorney General

#408-4603 Kingsway Avenue

Burnaby, BC, V5H 4M4

Office: 604-660-0269

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**From:** Fitzgerald, Anna FIN:EX



**Sent:** Thursday, September 14, 2017 6:05 PM  
**To:** Stewart, Robert A FIN:EX; Meilleur, Len FIN:EX  
**Subject:** FW: RRCR issue re 3rd party buy in  
**Importance:** High

Hello Len and Bob,

I think we should let them know we will look into this ( if we aren't already) and touch base with Dary TOTTENHAM first thing tomorrow. Any other thoughts?

Anna

---

**From:** Ross Alderson [<mailto:RAlderson@BCLC.com>]  
**Sent:** Thursday, September 14, 2017 5:19 PM  
**To:** Fitzgerald, Anna FIN:EX  
**Cc:** Meilleur, Len FIN:EX; Daryl Tottenham; Kevin Sweeney; Rob Kroeker  
**Subject:** RRCR issue re 3rd party buy in  
**Importance:** High

Hi Anna,

Firstly official congrats on your new position s.22

s.22

I further look forward to the continued excellent working relationship.

I did leave you a quick VM on your cell. A matter has come up at RRCR this week that I believe should be of concern to GPEB as it has been to BCLC.

Essentially a third party cash buy in for \$200K on behalf of a banned individual was allowed by the site. The individual who purchased the chips then left the site immediately with the chips without play. s.15

s.15,s.22

**Many thanks**

Ross Alderson CAMS.

Director, AML & Investigations

Corporate Security and Compliance Division, BCLC

2940 Virtual Way, Vancouver, BC, V5M 0A6

T 604 225 6382 C s.22

F 604 225 6488

● ***Yes, and...*** ●

[ralderson@bclc.com](mailto:ralderson@bclc.com)

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Last year, more than \$1 billion generated by BCLC gambling activities went back into health care, education and community groups across B.C.

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Page 70

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s.22;s.21

Page 71

Withheld pursuant to/removed as

s.21

Page 72 to/à Page 74

Withheld pursuant to/removed as

s.22;s.15;s.21



**PART A – GENERAL INFORMATION**

UNIT DEMANDING (*Compliance Division or Licensing, Registration & Certification Division*)

**Compliance Division - Lower Mainland Region**

DEMAND MADE TO (*BCLC, Service Provider, Registrant, or Licensee*)

**River Rock Casino**

FILE NUMBER

**97791**

OFFENCE

**Sec. 462.31 CCC - Proceeds of Crime**

PROVIDE THE FOLLOWING INFORMATION

☒ Immediately ☐ Within \_\_\_\_\_ days

METHOD OF ACCESS PREFERRED

☒ Receive copies of originals ☐ Examine originals at site

**PART B – REQUESTED INFORMATION**

Please provide the following information:

- I-TRAK # 2017-52416

COMPLIANCE DIVISION ADDRESS

**Compliance Division, Lower Mainland Region  
408-4603 Kingsway Avenue, Burnaby BC V5H 4M4**

**PART C – AUTHORIZATION**

I am authorized to make this demand on behalf of the General Manager under authority of Section 86(1) *Gaming Control Act*.

NAME OF PERSON MAKING DEMAND

TITLE/POSITION

SIGNATURE

DATE SIGNED  
YYYY / MM / DD

**Heather SAMSON**

**Investigator**

**x**

**2018-08-14**

This demand for information (both the form and any attachments) is intended for use by the person or persons to whom it is addressed and must not be shared or disseminated unless authorized by law or without the expressed authority of the General Manager.



**Gaming Policy and Enforcement Branch  
Compliance Division**

**Section 86(2) Gaming Control Act &  
Section 34(1)(t) Gaming Control Regulation**

---

**REPORT TO GPEB – PLEASE SUBMIT WITHOUT DELAY**

**CONFIDENTIAL**

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**Date:** 2017-09-13

**ITRAK #:** 17-52024

**Service Provider:** GCC

**Location:** River Rock Casino Resort - 8811 River Road, Richmond BC V6X 3P8

**Occurrence:** SFT & buy in with no play

**Date & Time of Occurrence:** 2017-09-13 @ 1400 hrs

**Details:** New SID s.22 bought in for 200K – 2000 x \$100 and left site with no play.

---

**Police Called:** Yes ☐ No ☐

**Attended:** Yes ☐ No ☐

**Police Force:** [Click here to enter text.](#)

**File Number:** [Click here to enter text.](#)

**Investigating Officer(s) & Badge Number(s):** [Click here to enter text.](#)

**GPEB Registration #:** [Click here to enter text.](#)

**Submitted by:** 25549

**E-Mail** SGGPEB86ReportingLMD@gov.bc.ca

Lower Mainland Regional Office, 408 – 4603 Kingsway Ave, Burnaby B.C. , V5H 4M4

Page 003 to/à Page 006

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s.15



Page 007

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s.13

Page 008 to/à Page 019

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s.15



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of Canada

Gouvernement  
du Canada

Canada

[Financial Transactions and Reports Analysis Centre of Canada \(/intro-eng.asp\)](#)

[Home](#) / [Guidance](#) / [Know your client requirements](#)

/ Third party determination requirements

# Third party determination requirements

Third party requirements under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and associated Regulations.

**June 2017**

Copyright

Page 021 to/à Page 024

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Copyright



Reasonable Measures

Date Completed: \_\_\_\_\_

s.22

Guest Name : \_\_\_\_\_

Guest SID #: \_\_\_\_\_

Ask the guest if he/she was acting on behalf of a third party.

Are you buying in or cashing out on behalf of someone else?" Answer:

- ☐ YES (third party transaction confirmed)  
☐ NO (funds belong to individual)  
☐ UNDEtermined (see reason why below)

Time: \_\_\_\_\_ Buy-in / Cash-out Amount:

14:12 B (C) C \$ 200,000 Yes \_\_\_ No ☒ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

s.22

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

\_\_\_\_\_ B \_\_\_ C \_\_\_ \$ \_\_\_\_\_ Yes \_\_\_ No \_\_\_ UND \_\_\_

Employee Name/GPEB: \_\_\_\_\_

Why Reasonable measures were unsuccessful:

If third party transaction confirmed:

Third Party Name: \_\_\_\_\_

DOB: \_\_\_\_\_

Address: \_\_\_\_\_

Occupation: \_\_\_\_\_

Nature of Relationship: \_\_\_\_\_

☐ Government Issued ID Confirmed

Page 026 to/à Page 049

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s.22;s.15

Page 050 to/à Page 073

Withheld pursuant to/removed as

s.16;s.22;s.15

belc

Reasonable Measures

Date Completed:

s.22

Guest Name :

Guest SID #:

Ask the guest if he/she was acting on behalf of a third party.

Are you buying in or cashing out on behalf of someone else?" Answer:

- ☐ YES (third party transaction confirmed)  
☐ NO (funds belong to individual)  
☐ UNDEtermined (see reason why below)

Time:

Buy-in / Cash-out Amount:

14:12 B C \$ 200,000 Yes No ☒ UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:

B C \$ Yes No UND

Employee Name/GPEB:



**Incident File Full Report****Incident File #IN20150001135**

		Record Creation Details	
Date/Time Occurred:	07-Jan-2015 0:12	Department:	Gaming Operations
Day of Week Occurred:	Wednesday	Owner:	s.15,s.19
Date/Time Created:	07-Jan-2015 0:29	Operator ID:	
Date/Time Closed:	07-Jan-2015 8:54	Operator Name:	
Closed By:	s.15,s.19	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

**Location of Incident:**

Property:	River Rock (GCC)
Location:	Back of House-River Rock (GCC)
Sublocation:	Cash Cage

**Details of Incident:**

Daily Log #:	DL20150019916
Type:	Gaming
Specific:	Cage
Category:	PGF Accounts
Incident Status:	Closed
Synopsis:	C/M s.22 - CD-13 - Sub. No. 89160 - New PGF A/C - deposit of \$ 200 K - Then Buy/in of \$ 200 K at MDB-20 - Mon. 413

**Checklist:**

Narrative:	Created On	Created By	Modified On	Modified By
------------	------------	------------	-------------	-------------

**Executive Brief:****Participants Involved:**

Personnel:	s.15,s.19	Property:	Vancouver (BCLC)
Role:	Documenter	Department:	BCLC
Personnel:	s.15,s.19	Property:	River Rock (GCC)
Role:	Documenter	Department:	Cage
Subject:	s.22	Company:	s.22
Role:	Patron		

**Reporting Party:****Supervisor:**

## Supplemental Entries:

SP20150003210 Attached by s.15,s. on Jan 7, 2015 00:39

Description: NEW PGF account# s.2 for patron, s.22 SID#s.22 was opened. Initial deposit was a s.22 \$200,000.

s.15,s.19

Cage Supervisor

SP20150003310 Attached by s.15,s. on Jan 7, 2015 07:37

Description: New PGF account s.22 opening incident noted for patron s.22 SID#s.22 \$200,000.00 Bank Draft.

Identification on file, s.22

s.15,s.22

Update: Closed 2016-MAR-16

s.15,s.19

BCLC Casino Investigator

SP20160042738 Attached by s.15,s. on Mar 16, 2016 14:41

Description: On gaming date of march 16, 2016, PGF account#s.2 for patron s.22 was BCLC prohibited for 2 years to expire February 10, 2018. Cheque#s.22 amounting to \$265,000 was issued in s.22 favor for the remaining balance on his account. The cheque was picked up by s.22 s.22 who presented his BCDL#s.22 thru a Power of Attorney issued by patron, s.22

s.15,s.19

Cage Shift Manager

Reporting Party:

Supervisor:

---

**Incident File Full Report****Incident File #IN20160008580**

---

		Record Creation Details	
Date/Time Occurred:	10-Feb-2016 21:15	Department:	Gaming Operations
Day of Week Occurred:	Wednesday	Owner:	s.15,s.19
Date/Time Created:	10-Feb-2016 21:16	Operator ID:	
Date/Time Closed:		Operator Name:	
Closed By:		Personnel ID:	
		Card Number:	
		Job Position	
		Secondary Operator:	

---

**Location of Incident:**

---

Property:	River Rock (GCC)
Location:	Casino Floor-River Rock (GCC)
Sublocation:	MDB 26

---

**Details of Incident:**

---

Daily Log #:	DL:s.22		
Type:	Criminal Event		
Specific:	s.15		
Category:			
Incident Status:	Under Investigation		
Synopsis:	As per Security Shift Manager	s.15,s.19	s.15
Checklist:	- Section 86 Form		

Narrative:	Created On	Created By	Modified On	Modified By
------------	------------	------------	-------------	-------------

**Executive Brief:**

Reporting Party:

Supervisor:

**Incident File Full Report****Incident File #IN20160008580****Participants Involved:**

Personnel:	s.15,s.19	Property:	River Rock (GCC)
Role:	Documenter	Department:	Security
Personnel:	s.15,s.19	Property:	River Rock (GCC)
Role:	Documenter	Department:	Security
Personnel:	s.15,s.19	Property:	River Rock (GCC)
Role:	Documenter	Department:	s.15
Personnel:	s.15,s.19	Property:	River Rock (GCC)
Role:	Documenter	Department:	Security
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Victim	Department:	Food & Beverage
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Victim	Department:	Guest Services
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Witness	Department:	Tables
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Witness	Department:	Guest Services
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Witness	Department:	Tables
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Witness	Department:	Tables
Personnel:	s.22	Property:	River Rock (GCC)
Role:	Witness	Department:	Tables
Subject:	s.22	Company:	s.22
Role:	Accused		

**Reporting Party:****Supervisor:**

**Supplemental Entries:**

---

SP20160022761 Attached by s.15, on Feb 10, 2016 22:22

Description: s.15,s.19,s.22

---

SP20160022785 Attached by s.15, on Feb 10, 2016 22:57

Description: s.15,s.19,s.22

**Reporting Party:**

**Supervisor:**

SP20160022785 Attached by s.15, on Feb 10, 2016 22:57

SP2016002278

5 - Continued-

s.15,s.19

SP20160022842 Attached by s.15 on Feb 11, 2016 02:35

Description: At approximately 2110hrs the Writer was informed by Security Supervisor s.15,s.19 of a possible incident of inappropriate behavior of a Patron towards Server s.22. s.15,s.19 was already speaking with F&B Shift Manager s.15,s.19 who was reporting the incident to Security. As per s.15,s.19 had approached GSO s.15,s.19 inquiring if s.15,s.19 witnessed what transpired, which s.15,s.19 stated s.15,s.19 didn't and notified s.15,s.19 explained that s.15,s.19,s.22 was serving Patrons in Salon and was s.15,s.22 and the same player then s.15,s.22 s.15,s.22 was requested to speak with s.15,s.22 to investigate the claim as the Writer would attend s.15 the Writer s.15 the incident took place at approximately 2028hrs. s.15,s.22 s.15,s.22

s.15,s.22 The Writer contacted Security s.15,s.19 and informed s.15,s.19 of the incident and it was decided as per s.15,s.19 to bar s.15,s.22 14 days pending further review and investigation.

s.15,s.22 s.15,s.22 had then contacted the Writer and informed me that s.15,s.22 s.15,s.22

s.15,s.22 The Writer met with s.15,s.22 and discussed the incident and the barring decision. s.15,s.22 then approached s.15,s.22 and informed him of his barring and the reason. s.15,s.22 cashed out and left site with s.22

The Writer then spoke with s.15,s.19 and s.15,s.19 in the Phoenix serving area. s.15,s.22 and was informed that I understood s.15,s.22 was informed that we are requesting a statement from s.15,s.22 and that s.15,s.22 has the right to notify the RCMP of the incident. s.15,s.22 understood and stated s.15,s.22 would submit a statement later. As per s.15,s.19 s.15,s.22 was informed of s.15,s.22 by s.15,s.22 was offered an escort to s.15,s.22 vehicle which s.15,s.22 declined. s.15,s.22 however was escorted by s.15,s.19 and left site shortly after. The Writer requested statements from all staff who may have seen the incident. Other staff were spoken too who may have witnessed the incident and the statements have been added to the incident. s.15,s.22 statement will be added if s.15,s.22 writes one for Security.

Security Shift Manager  
s.15,s.19

SP20160022879 Attached by s.15 on Feb 11, 2016 05:52

Description: At approximately 2110hrs on February the 11th 2016, GSO/S s.15,s.19 was informed by F&B Manager s.15,s.19 that one of the Salon Servers had been s.15

Reporting Party:

Supervisor:

SP20160022879 Attached by s.15 on Feb 11, 2016 05:52

SP2016002287

9 - Continued-

s.15 immediately informed s.15,s.19  
s.15 while s.15 found the Complainant.  
s.15,s.19,s.22

s.15,s.19

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SP20160022917 Attached by s.15,s on Feb 11, 2016 08:12

Description: BCLC REVIEW-Follow Up Required.

The writer has read the supplements associated with this incident.

s.15,s.19

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BCLC Casino Investigator

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SP20160023200 Attached by s.15 on Feb 11, 2016 18:33

Description: At approx 0430 pm , Writer spoke with employee s.22 to collect statement. During the  
s.15,s.19,s.22

Statements are attached to s.15

Manager, Security  
s.15,s.19

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SP20160023647 Attached by s.15 on Feb 12, 2016 13:13

Description: s.15,s.16

Reporting Party:
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Supervisor:
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SP20160023647 Attached by s.15 on Feb 12, 2016 13:13

SP2016002364

7 - Continued-

s.15,s.16,s.22

Casino Investigations  
BCLC

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SP20160023759 Attached by s.15 on Feb 12, 2016 17:19

Description: On February 12 2016 at approximately 1400 hrs, s.15,s.16,s.19  
s.15 in the Security holding room.

s.15,s.19,s.22

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SP20160024681 Attached by s.15 on Feb 14, 2016 08:29

Description: s.14,s.15

Request made at 0846hrs on 2016-FEB-14.

s.15 and Security have been contacted to prepare the requested

Reporting Party:
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Supervisor:
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SP20160024681 Attached by s.15 s on Feb 14, 2016 08:29  
s.14,s.15,s.19

SP2016002468  
1 - Continued-

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SP20160024776 Attached by s.15 s on Feb 14, 2016 12:31

Description: On Feb.14/16 following e-mail was received from BCLC s.15,s. :

Good Morning Security &s.15 Managers,  
s.15,s.16

Thanks,

s.15,s.19  
BCLC Investigator  
Corporate Security and Compliance  
BCLC 2940 Virtual Way, Vancouver BC V5M 0A6  
C s.17  
s.15,s.19  
bclc.com

s.15

s.15,s.19

---

SP20160026208 Attached by s.15 s on Feb 16, 2016 21:12

Description: On Feb 12th 2016 the Writer interviewed other Employee's who may have witnessed the incident

**Reporting Party:**

**Supervisor:**

SP20160026208 Attached by [REDACTED] on Feb 16, 2016 21:12

SP2016002620

8 - Continued-

s.15,s.19,s.22

Security Shift Manager  
s.15,s.19

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SP20160027686 Attached by [REDACTED] on Feb 19, 2016 10:45

Description: 2016FEB19- Incident noted and reviewed. Writer concurs with the request of a Two (2) Year BCLC  
Provincial Prohibition against [REDACTED] due to [REDACTED].

s.15,s.19

BCLC Investigator  
Vancouver.

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SP20160033697 Attached by [REDACTED] on Feb 29, 2016 09:59

Description: On Feb.29/16 following e-mail was received from BCLC [REDACTED]

Hello [REDACTED] Shift Managers,  
s.15

Note: I have contacted the Cage to see if this patron has funds in [REDACTED] PGF Account.  
Thanks,

s.15,s.19

<b>Reporting Party:</b>
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<b>Supervisor:</b>
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SP20160033697 Attached by s.15.s. on Feb 29, 2016 09:59

SP2016003369

7 - Continued-

BCLC Investigator  
Corporate Security and Compliance  
BCLC 2940 Virtual Way, Vancouver BC V5M 0A6  
C s.17  
s.15,s.19

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SP20160033852 Attached by s.15.s. on Feb 29, 2016 14:49

Description: BCLC c.15 c. was issued s.15  
s.15

s.15,s.19

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SP20160034315 Attached by c.15 c. on Mar 1, 2016 12:45

Description: s.15,s.16,s.19

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**BCLC Director AML & Operational Analysis**

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SP20160034493 Attached by c.15 c. on Mar 1, 2016 20:20

Description: 2016Mar01  
s.15,s.16,s.19

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SP20160034576 Attached by c.15 on Mar 1, 2016 23:06

Description: On 2016 MAR 01 at approx. 2015 hours, RS/S s.15,s.16,s.19  
s.15,s.16,s.19

<b>Reporting Party:</b>
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<b>Supervisor:</b>
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Reporting Party:

Supervisor:

**Incident File Full Report****Incident File #IN20160015913****Record Creation Details**

Date/Time Occurred: 16-Mar-2016 11:57  
Day of Week Occurred: Wednesday  
Date/Time Created: 16-Mar-2016 11:57  
Date/Time Closed: 16-Mar-2016 18:18  
Closed By: S.15 S.19

Department: Gaming Operations  
Owner: S.15,S.19  
Operator ID:  
Operator Name:  
Personnel ID:  
Card Number:  
Job Position:  
Secondary Operator:

**Location of Incident:**

Property: River Rock (GCC)  
Location: Back of House-River Rock (GCC)  
Sublocation: VIP Cash Cage

**Details of Incident:**

Daily Log #: DL s.22  
Type: Gaming  
Specific: Cage  
Category: Return of PGF  
Incident Status: Closed  
Synopsis: C/S - SID s.22 - closing PGF (authorized party to pick up cheque)  
Checklist:

Narrative:

Created On	Created By	Modified On	Modified By
16-Mar-2016 12:06	S.15 S.19	16-Mar-2016 14:56	S.15 S.19

Closing of PGF - please refer to S.15

**Executive Brief:****Reporting Party:****Supervisor:**

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**Incident File Full Report**

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**Incident File #IN20160015913**

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**Participants Involved:**

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Personnel:	s.15,s.19	Property:	Vancouver (BCLC)
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Role:	Documenter	Department:	BCLC
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Personnel:	s.15,s.19	Property:	River Rock (GCC)
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Role:	Documenter	Department:	Cage
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Subject:	s.22	Company:	s.22
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Role:	Other
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Subject:	s.22	Company:	s.22
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Role:	Patron
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**Supplemental Entries:**

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SP20160042750 Attached by s.15 s on Mar 16, 2016 15:17

Description: On gaming date of march 16, 2016, PGF account#s.2 for patron s.22 was BCLC prohibited for 2 years to expire February 10, 2018. Cheque#s.17 amounting to \$265,000 was issued in e favor for the remaining balance on e account. The cheque was picked up by s.22 s.2 who presented his BCDL#s.22 thru a Power of Attorney issued by patron s.22

s.15,s.19

Cage Shift Manager

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SP20160043011 Attached by s.15 s on Mar 17, 2016 05:33

Description: s.15

Reporting Party:
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Supervisor:
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Withheld pursuant to/removed as

s.16;s.22;s.15

**Incident File Full Report****Incident File #IN20170052416**

		Record Creation Details	
Date/Time Occurred:	15-Sep-2017 17:40	Department:	Gaming Operations
Day of Week Occurred:	Friday	Owner:	s.15,s.19
Date/Time Created:	15-Sep-2017 17:40	Operator ID:	
Date/Time Closed:	16-Sep-2017 0:15	Operator Name:	
Closed By:	s.15 s.19	Personnel ID:	
		Card Number:	
		Job Position:	
		Secondary Operator:	

**Location of Incident:**

Property:	River Rock (GCC)
Location:	Back of House-River Rock (GCC)
Sublocation:	VIP Cash Cage

**Details of Incident:**

Daily Log #:	DL s.22
Type:	Gaming
Specific:	BCLC
Category:	BCLC Directive
Incident Status:	Closed
Synopsis:	s.22 Cash Out \$200 K at CD 19
Checklist:	

Narrative:	Created On	Created By	Modified On	Modified By
	15-Sep-2017 17:41	s.15 s.19		
	s.22	:		
	2017-SEP-15 -s.15	**BCLC Directive - RRCR** - s.22		has agreed to attended RRCR on 2017-SEP-16 and return the \$200,000 in chips purchased 2017-SEP-13. Please complete the disbursement paying cash (\$100 bills) and ensure to complete the Reasonable Measures form. s.15,s.22
	s.15,s.22			
	s.15,s.22	once completed. Any questions or concerns please contact s.1		
	s.15.s.22	directly at s.17		

**Executive Brief:****Reporting Party:****Supervisor:**



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**Incident File Full Report****Incident File #IN20170052416**

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**Participants Involved:**

Subject: s.22

Company: s.22

Role: Accused

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**Supplemental Entries:**

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SP20170145945 Attached by s.1 on Sep 15, 2017 18:10

Description: s.15,s.19,s.22

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SP20170145985 Attached by s.15 on Sep 15, 2017 20:15

Description: On the gaming date of Sep 15, 2017 Patron s.22 cashed out \$200K and Reasonable Measure was conducted by s.15,s.19 and Cashier s.15 s.19 claimed that s.15 is the owner of the funds and this was recorded on the RM.

All departments are informed.

s.15,s.19

RRC TGM


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SP20170148269 Attached by s.15 s.19 on Sep 19, 2017 15:03

Description: s.15,s.19 Investigator of Compliance Division GPEB, sent s.15 s.19 an email and s.15,s.19

Reporting Party:
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Supervisor:
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SP20170148269 Attached by  15 on Sep 19, 2017 15:03

SP2017014826

9 - Continued-

s.15,s.19

Reporting Party:

Supervisor:

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Withheld pursuant to/removed as

s.19;s.22;s.15

Page 098 to/à Page 103

Withheld pursuant to/removed as

s.22;s.15

## Subject Detailed

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s.22

Name: s.22  
Subject ID:  
Status: **WATCHED**  
Category: POI  
Last Incident: 15-Sep-2017 s.15  
Gender: s.22 Race: s.22  
Age: Date of Birth:  
Height: 0 cm Weight: 0 Kg  
Hair: s.22 Eye Color: s.22

### Watched

15-Sep-17

### Incident #:

#### Comment

2017-SEPT-15 RRCR s.22 returned and cashed out 200K in 5K chips. Email sent to s.15  
2017-SEP-15 s.15 Unit \*\*BCLC Directive - RRCR\*\* s.22 has agreed to attend RRCR on 2017-SEP-16  
and return the \$200,000 in chips purchased 2017-SEP-13. Please complete the disbursement paying cash (\$100 bills)  
and ensure to complete the Reasonable Measures form. s.15,s.22  
s.15,s.22  
document on a BCLC Directive file and notify s.15 once completed. Any questions or concerns please contact  
s.15,s.19  
2017-SEP-13 RRCR - UFT.

#### Activities

Mini Baccarat

#### Known Associates

s.22

## Subject Detailed

---

### Personnel Information

Occupation: s.22

Address:

Country: CA

Home Phone: s.22

Work Phone:

Email:

Id Type

Id Number

## Subject Detailed

### Incidents

Date Occurred : 16-Mar-2016 11:57

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20160015913	Gaming	Cage	Back of House-River Rc	VIP Cash Cage

Synopsis: C/S s.15 - s.22 closing PGF (authorized party to pick up cheque)

Narrative: Closing of PGF - please refer to s.15

Created by: s 15 s 3/16/2016 12:06:17 PM Modified by: s 15 s 3/16/2016 2:56:18 PM

Daily Total : 1

Date Occurred : 13-Sep-2017 14:08

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20170052024	Gaming	s.15		

s.15,s.19,s.22

Daily Total : 1

Date Occurred : 15-Sep-2017 17:40

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20170052416	Gaming	BCLC	Back of House-River Rc	VIP Cash Cage

Synopsis: s.22 Cash Out \$200 K at CD 19

Narrative: s.22

2017-SEP-15 - BCLC AML Unit \*\*BCLC Directive - RRCR\*\* - s.22 has agreed to attend RRCR on 2017-SEP-16 and return the \$200,000 in chips purchased 2017-SEP-13. Please complete the disbursement paying cash (\$100 bills) and ensure to complete the Reasonable Measures form. s.15,s.2 s.15,s.22 s.15,s.22

Please document on a BCLC Directive file and notify s.15 once completed. Any questions or concerns please contact s.1 s.15,s.19 directly at s.17

Created by: s 15 s 9/15/2017 5:41:10 PM Modified by:

Daily Total : 1

Grand Total : 3

## Subject Detailed

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### Record Creation Information

Property:

Department Name: Gaming Operations

Created: 13-Sep-2017 14:08

Owner: s.15.s.1



## Subject Detailed

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s.22

Name: s.22  
Subject ID:  
Status:  
Category: POI  
Last Incident: 13-Sep-2017 s.15  
Gender: s.22 Race: s.22  
Age: Date of Birth:  
Height: 0 cm Weight: 0 Kg  
Hair: s.22 Eye Color: s.22

### Activities

Mini Baccarat

### Known Associates

s.22

### Personnel Information

Occupation: s.22

Address:

Country: CA

Home Phone: s.22

Work Phone:

Email:

Id Type

Id Number

## Subject Detailed

---

### Incidents

Date Occurred : 16-Mar-2016 11:57

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20160015913	Gaming	Cage	Back of House-River Rc	VIP Cash Cage

Synopsis: C/S s.1 - s.22 - closing PGF (authorized party to pick up cheque)

Narrative: Closing of PGF - please refer to s.15

Created by: s.15 s.1 3/16/2016 12:06:17 PM Modified by: s.15 s.1 3/16/2016 2:56:18 PM

Daily Total : 1

Date Occurred : 13-Sep-2017 14:08

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20170052024	Gaming	s.15		

s.15,s.19,s.22

Daily Total : 1

Grand Total : 2

### Record Creation Information

Property:

Department Name: Gaming Operations

Created: 13-Sep-2017 14:08

Owner: s.15 s.1

## Subject Detailed

---

s.22

Name: s.22  
Subject ID:  
Status: **BANNED**  
Category: POI  
Last Incident: 16-Mar-2016 s.15  
Gender: s.22 Race: s.22  
Age: Date of Birth:  
Height: 0 cm Weight: 0 Kg  
Hair: Eye Color:

### Ban Information

Commencement Date: 10-Feb-16  
EndDate: 10-Feb-18  
Type Of Ban: BCLC Prohibition  
Incident #:

### Distinguishing Characteristics

s.15

### Comment

2016-FEB-24 BCLC Kam suspended BC Encore account  
2016-FEB-24 BCLC Notice of Prohibition and Letter attached to profile for service  
2016-FEB-10 RRCR 14 day barring for inappropriate behavior pending further review.  
2015-May-13 Updated Company name, phone#, address  
2015-FEB-24 s.15

s.15  
s.15,s.19

2014-AUG-26 RRCR involved in possible chip pass incident - not approached s.15  
2013-OCT-12 RRCR involved in possible chip pass incident - not approached  
2013-OCT-10 RRCR involved in possible chip pass incident - not approached  
2013-MAR-01 RRCR barred 2 weeks for Assault. pending investigation  
2013-FEB-28 RRCR BCDL updated  
2012-Jan.-26 s.15,s.19  
2011-SEP-16 - s.15  
2011-AUG-04 - RRCR s.15 issued @2400H  
2011-AUG-02 - RRCR \*\*\*\* s.15 for chip pass on 27th JULY Incident s.15  
refers\*\*\*BCLC s.15,s.19  
-JUL-27 RRCR Involved in 2nd chip pass with s.22  
2011-JUL-27 RRCR Involved in chip pass with s.22  
2010-Nov.-06 RRCR s.22,  
RRCR

### Activities

Mini Baccarat

## Subject Detailed

---

### Known Associates

s.22

### Additional Information

BC Gold Card: s.22

License #/Prov

### Personnel Information

Occupation: s.22

Address:

Country: CA

Home Phone: s.22

Work Phone s.22

Email:

### Id Type

### Id Number

Driver's licence

s.22

## Subject Detailed

---

### Ban/Watch History

<u>Incident #</u>	<u>Type</u>	<u>Charged</u>	<u>Reason For Ban</u>	<u>Type Of Ban</u>	<u>Start</u>	<u>End</u>	<u>Letter Sent</u>
IN20160008580	Ban	<input type="checkbox"/>		Site Barring	2/10/2016	2/24/2016	<input type="checkbox"/>
IN20130010650	Ban	<input type="checkbox"/>		Site Barring	3/1/2013	3/15/2013	<input type="checkbox"/>

## Subject Detailed

### Incidents

Date Occurred : 12-May-2011 0:44

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20110020477	Gaming	Exchange of Cash/Chip	Back of House-River Rc Vault	

Synopsis: M40 CD19 Using cash counter

Narrative:

Daily Total : 1

Date Occurred : 27-Jul-2011 22:27

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20110032694	Gaming	Exchange of Cash/Chip	Casino Floor-River Rocl	

Synopsis: Possible chip pass between Sub. ID# S.22

Narrative:

Daily Total : 1

Date Occurred : 28-Jul-2011 0:21

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20110032713	Gaming	Exchange of Cash/Chip	Casino Floor-River Rocl MDB 28	

Synopsis: Chip pass between s.22

Narrative:

Daily Total : 1

Date Occurred : 05-Aug-2011 21:18

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20110034041	Large Cash Transactio	Unusual Activity	Back of House-River Rc	VIP Cash Cage

Synopsis: M39, C/S s.15 s.15  
by s.22

Narrative:

Daily Total : 1

Date Occurred : 12-Oct-2011 21:26

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20110044783	s.15		Back of House-River Rc	VIP Cash Cage

Synopsis: s.15 t. M 39

## Subject Detailed

Narrative:

Daily Total : 1

Date Occurred : 01-Mar-2013 22:28

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130010650	Ban	Site Barring	Casino Floor-River Ro	cl

Synopsis: s.22 to be barred for inappropriate behavior

Narrative:

Daily Total : 1

Date Occurred : 10-Oct-2013 21:22

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130049340	Gaming	Exchange of Cash/Chip	Back of House-River Rc	VIP Cash Cage

Synopsis: m 31 / \$40K (all \$20's) buy-in s.22 / CD s.15 / CS - s.15,s.19

Narrative: Incident drop downs changed for statistical purposes s.15

Created by: c 15 c 1 10/11/2013 12:54:08 PM Modified by:

s.15,s.19,s.22

Daily Total : 2

Date Occurred : 11-Oct-2013 22:12

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130049516	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	cl MDB 31

Synopsis: CHIP PASS

Narrative:

Daily Total : 1

Date Occurred : 12-Oct-2013 4:55

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130049584	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	cl MDB 24

Synopsis: Chip pass. M31.

Narrative: Incident drop downs changed for statistical purposes.

Created by: c 15 c 1 11/06/2013 13:01:32 PM Modified by:

## Subject Detailed

Daily Total : 1

Date Occurred : 07-Nov-2013 19:43

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130054290	s.15			

s.15,s.22

s.15 Criminal Event Counterfeit Back of House-River Rc VIP Cash Cage

Synopsis: M40 - 2 x \$100 Counterfeit Bills found on a buy-in for s.22

Narrative:

Daily Total : 2

Date Occurred : 09-Nov-2013 20:54

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130054556	Gaming	Cage	Back of House-River Rc VIP Cash Cage	

Synopsis: New PGF Account for s.22

Narrative:

Daily Total : 1

Date Occurred : 14-Nov-2013 22:15

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130055384	Gaming	Exchange of Cash/Chip	Casino Floor-River Rocl MDB 27	

Synopsis: s.22 chip pass approx. 30K M.12

Narrative:

Daily Total : 1

Date Occurred : 16-Nov-2013 2:59

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20130055581	s.15			

s.15,s.19

Daily Total : 1



## Subject Detailed

Date Occurred : 05-Jan-2014 22:30

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140000886	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 30

Synopsis: exchange of chips between s.22

Narrative:

Daily Total : 1

Date Occurred : 08-Jan-2014 21:34

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140001383	s.15			

s.15,s.22

s.15	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 13
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Synopsis: M39 - Chip Pass of \$110K from s.22

Narrative:

Daily Total : 2

Date Occurred : 07-May-2014 22:03

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140023305	Gaming	Exchange of Cash/Chip	Back of House-River Rc	Cash Cage

Synopsis: CD 19, M 31 Buy In of \$ 329980 s.22 in mostly \$ 20 Bills  
9999 in \$ 20 Bills 199980  
548 in \$ 50 Bills 27400  
1026 in \$ 100 Bills 102600 Total of \$ 329980

Narrative:

Daily Total : 1

Date Occurred : 08-May-2014 16:13

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140023428	s.15			

s.15,s.19,s.22

Daily Total : 1

## Subject Detailed

Date Occurred : 23-Aug-2014 22:20

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140042638	Gaming	Exchange of Cash/Chip: Back of House-River Rc	VIP Cash Cage	

Synopsis: C/S s.1 - CD 19 - Cashcounter - B/I \$50k ( 2500 x \$20) - s.22 - MDB 27 - M 39

Narrative:

IN20140042605

s.15

s.15,s.19,s.22

Daily Total : 2

Date Occurred : 25-Aug-2014 5:44

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140042852	Gaming	Exchange of Cash/Chip: Back of House-River Rc	VIP Cash Cage	

Synopsis: cashcounter / cashout s.15 / \$450 cash \$150 win cheque s.22

Narrative: \$100K chip pass from s.22

Created by: 8/25/2014 06:06:26 AM Modified by:

Daily Total : 1

Date Occurred : 26-Aug-2014 23:27

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140043142	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 29	

Synopsis: Chip pass between s.22 and new s.22 s.15

Narrative:

IN20140043126 Gaming Exchange of Cash/Chip: Casino Floor-River Rocl MDB 27

Synopsis: cash pass between 2 known players s.22 s.15

Narrative:

Daily Total : 2

Date Occurred : 28-Aug-2014 22:00

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140043512	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 29	

Synopsis: \$100K chip pass from s.22 (\$50K) & s.22 5 (\$50K) s.15

Narrative:

## Subject Detailed

Daily Total : 1

Date Occurred : 11-Sep-2014 23:21

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140046058	s.15			
s.15,s.19,s.22				

IN20140046050      Gaming      Exchange of Cash/Chip: Casino Floor-River Rock MDB 30

Synopsis: Chip Pass of \$45k from s.22      s.15

Narrative:

Created by: s.15 s.19 9/11/2014 23:05:58 PM Modified by:

Daily Total : 2

Date Occurred : 12-Sep-2014 20:40

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140046174	s.15			
s.15,s.22				

Daily Total : 1

Date Occurred : 16-Sep-2014 16:45

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140046886	s.15			
s.15,s.22				

Narrative:

s.15      Gaming      Exchange of Cash/Chip: Casino Floor-River Rock MDB 14

Synopsis: Chip pass of \$100K between passer s.22      s.15

Narrative:

Daily Total : 2

Date Occurred : 19-Sep-2014 21:49

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
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## Subject Detailed

IN20140047455      Gaming      Exchange of Cash/Chip: Casino Floor-River Rocl MDB 24

Synopsis: Cash Pass of \$20K from s.22

Narrative:

Created by: s.15, s. 9/19/2014 21:52:47 PM      Modified by:

Daily Total : 1

Date Occurred : 20-Sep-2014 21:04

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140047666	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 28	

Synopsis: ~55K Chip pass between s.22      MDB 28

Narrative:

Daily Total : 1

Date Occurred : 21-Sep-2014 20:38

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140047867	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 26	

Synopsis: 100K chip pass between s.22      s.15

Narrative:

Daily Total : 1

Date Occurred : 23-Sep-2014 22:31

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140048215	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 28	

Synopsis: m 49 - CHIP PASS approx. \$75K from s.22

Narrative:

Daily Total : 1

Date Occurred : 13-Oct-2014 15:42

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140051926	Gaming	Exchange of Cash/Chip: Casino Floor-River Rocl	MDB 28	

Synopsis: 100K Chip pass from s.22      on MDB 28 s.15

Narrative: s.22

Created by: s.15, s. 10/13/2014 21:12:22 PM      Modified by:

Daily Total : 1

## Subject Detailed

Date Occurred : 17-Oct-2014 1:39

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140052516	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 20

Synopsis: s.22

Narrative:

Daily Total : 1

Date Occurred : 25-Oct-2014 1:00

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140053974	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 31

Synopsis: C1304 and C1304 s.22

- Chip Pass

Narrative:

Daily Total : 1

Date Occurred : 26-Oct-2014 22:52

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20140054357	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 18

Synopsis: CHIP PASS (\$100K) from s.22

- C 518 & 8271

Narrative:

Daily Total : 1

Date Occurred : 02-Jan-2015 21:54

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20150000428	Gaming	Exchange of Cash/Chip	Casino Floor-River Ro	CMDB 23

Synopsis: s.22 passed approximately \$10k ( in 100's ) to s.22 s.15

Narrative:

Daily Total : 1

Date Occurred : 07-Jan-2015 0:12

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20150001135	Gaming	Cage	Back of House-River Rc	Cash Cage

Synopsis: C/M s.1 - CD-13 s.22 - New PGF A/C - deposit of \$ 200 K - Then Buy/in of \$ 200 K at  
MDB-20 -s.15

Narrative:

## Subject Detailed

Daily Total : 1

Date Occurred : 26-Aug-2015 22:08

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20150044546	Gaming	Exchange of Cash/Chip	Casino Floor-River Rock	MDB 29

Synopsis: s.22 Passed approximately \$100k to s.22 s.15

Narrative: s.22

Created by: s.15 s. 8/26/2015 23:19:56 PM Modified by:

Daily Total : 1

Date Occurred : 28-Aug-2015 22:05

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20150044904	Gaming	Exchange of Cash/Chip	Casino Floor-River Rock	MDB 28

Synopsis: \$200K Chip Pass between s.22

Narrative:

Daily Total : 1

Date Occurred : 09-Feb-2016 22:20

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20160008340	s.15			

s.15,s.19,s.22

Daily Total : 1

Date Occurred : 10-Feb-2016 21:15

Status : Under Investigation

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
s.15	Criminal Event	s.15	Casino Floor-River Rock	MDB 26

Synopsis: As per Security Shift Manager s.15,s.19

Narrative:

## Subject Detailed

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Daily Total : 1

Date Occurred : 16-Mar-2016 11:57

Status : Closed

<u>Incident File #</u>	<u>Incident Type</u>	<u>Specific</u>	<u>Location</u>	<u>Sublocation</u>
IN20160015913	Gaming	Cage	Back of House-River Rc	VIP Cash Cage

Synopsis: C/S s.15 closing PGF (authorized party to pick up cheque)

Narrative: Closing of PGF - please refer to s.15

Created by: s.15 3/16/2016 12:06:17 PM Modified by: s.15 3/16/2016 2:56:18 PM

Daily Total : 1

Grand Total : 46

### Record Creation Information

Property:

Department Name: Gaming Operations

Created: 02-Nov-2010 3:04

Owner: s.15

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Withheld pursuant to/removed as

s.22





Reasonable Measures

Date Completed:

9/15/2017

Guest Name :

Guest SID #:

Ask the guest if he/she was acting on behalf of a third party.

"Are you buying in or cashing out on behalf of someone else?"

Answer:

- ☐ YES (third party transaction confirmed)  
☒ NO (funds belong to individual)  
☐ UNDEtermined (see reason why below)

Time: Buy-in / Cash-out Amount:

T 17:45 B ☒ \$ 200,000 Yes ☒ No ☐ UND

E s.22

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

T B C \$ Yes No UND

Employee Name/GPEB:

Why Reasonable measures were unsuccessful:

If third party transaction confirmed:

Third Party Name:

DOB:

Address:

Occupation:

Nature of Relationship:

☐ Government Issued ID Confirmed



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