

**MINISTRY OF ATTORNEY GENERAL  
BC PROSECUTION SERVICE  
BRIEFING NOTE**

**PURPOSE:** For INFORMATION of the Attorney General and Deputy Attorney General.

**ISSUE:** The problem of alleged money laundering through the facilities of BC gaming establishments requires a focussed and coordinated response. The BC Prosecution Service's (BCPS) role in responding to the problem must be proportional to the size of the problem that is uncovered and the level of police enforcement activity deployed to combat it.

**SUMMARY:**

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## **BACKGROUND:**

Money laundering is the process by which the profits of criminal activity are moved, layered, and transformed into assets that appear to be “clean”.

Recent investigations have revealed that suspected criminals are using casinos and real estate purchases in BC to launder money from within Canada, China, and elsewhere in an organized and systematic fashion. Recent reports also suggest that the highest proportion of large and suspicious cash transactions at River Rock Casino in 2015 were carried out by persons working in the real estate industry.

Money laundering investigations and prosecutions are often exceptionally large, complex, and prolonged. Money laundering schemes are often associated with criminal organizations, both foreign and domestic, and often cross national and provincial boundaries and involve numerous participants. Investigations can involve extensive surveillance of multiple individuals in different jurisdictions over extended periods of time and the use of complex evidence-gathering techniques. s.13,s.17

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**OTHER MINISTRIES IMPACTED/CONSULTED:**

s.13,s.15,s.17

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**BCLC  
BRIEFING DOCUMENT**

**Date Prepared:** February 20, 2018

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**TITLE:** Virtual Reality Game Concept Testing

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**PURPOSE:**

(X) FOR INFORMATION

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**TITLE:** Virtual Reality Game Testing

**ISSUE:** Virtual Reality Game Concept Testing

**SUMMARY:**

- BCLC is exploring the potential for virtual-reality games in a gambling context. One of the concepts that is being pursued is a virtual-reality escape room game whereby players attempt to solve challenges in order to escape a virtual room.
- BCLC is testing the game on a free-to-play basis in order to get player feedback. The concept game does not have a gambling component.
- BCLC has not yet determined potential distribution channels; however, players have indicated that they enjoy the social component of playing virtual reality games in a physical environment with friends and spectators.
- BCLC recognizes that further development and testing in the market is required. Should the game be deemed viable as a lottery scheme (as per the Gaming Control Act) it will require approvals from the Gaming Policy and Enforcement Branch and our Minister.

**BACKGROUND:**

- In order to entertain customers and sustain long-term business growth, BCLC will continue to offer new games and entertainment experiences that keep pace with trends and expectations.
- Players have told BCLC's content innovation team that they are interested in games that present an opportunity to 'escape' day-to-day activities, therefore the inspiration of an escape room was developed.
- BCLC identified that virtual reality technology would be the best medium to deliver such an experience. BCLC has been exploring the escape room game concept since 2016.
- BCLC is aware of several virtual reality games that are being offered on a free-to-play basis as additional entertainment in casinos in the U.S.; however, to BCLC's knowledge, none currently offer it with a gambling component.
- In early 2017, through a three-quote procurement process, BCLC procured the services of Archiact Interactive to develop a prototype of the game, in order to conduct non-gambling customer testing. The purpose of these tests was to determine if players enjoy the game.

- Early testing achieved favorable results so in April 2017 BCLC conducted further testing in a larger public environment at one of the entertainment amenities located at a casino (off the gaming floor).
- In March 2018, BCLC plans to conduct additional testing in the lounge at Grand Villa casino (off the gaming floor). Further testing and work will be required to determine the market viability of the game as a gambling product.
- As the value of work is approaching the direct award threshold, BCLC issued a Notice of Intent on B.C. Bid to continue development and establish a contract with Archiact Interactive until December 31, 2019.

**MINISTRY OF ATTORNEY GENERAL  
COURT SERVICES BRANCH  
BRIEFING NOTE**

**PURPOSE:** For INFORMATION for the Honourable David Eby, QC  
Attorney General

**ISSUE:** Representation of Indigenous persons on juries.

**SUMMARY:**

- Sheriff Services manages the jury summoning process for criminal, civil and coroner's court trials in British Columbia.
- It is believed the data used for jury summoning purposes includes strong representation from Indigenous persons.
- The relationship between Indigenous persons and the justice system is complex and impacts their participation rate at jury selection.
- Targeted outreach activities are planned to engage and encourage Indigenous persons' participation in the jury system with anticipated guidance from the BC Aboriginal Justice Council.

**BACKGROUND:**

Juror Summoning Process

- Sheriff Services uses the Jury Management System (JMS) to randomly select panelists and distribute summonses.
- All jury panels are created by algorithm to ensure complete randomness.
- Panelists are selected from a geographic area within one-hour, one-way travelling distance from the courthouse. This ensures no juror is unduly inconvenienced with lengthy travel distances.
- JMS does not flag persons based on their race, ethnicity, orientation, age or gender.
- JMS database pulls panelist information from the Elections BC database.
- The Elections BC database has approximately 3.6 million names, including Indigenous persons living on and off reserves.
- ICBC Driver Licence Update, Vital Statistics and Federal Elections feed information into the Elections BC database.
- s.13
- Court Services Branch (CSB) has no involvement in the selection of the juries. The in-court jury selection processes, including the use of peremptory challenges, are determined by the Judiciary and/or the *Criminal Code of Canada*.

Increasing Indigenous Representation on Juries

- CSB has specifically taken steps to provide Indigenous residents living on reserve, who may not be in the Elections BC database, an opportunity to be added to JMS. In 2011 and 2014, the branch sent letters to all First Nations Band Chiefs inviting them to provide band members' names, and mailing addresses for inclusion into the JMS database.

- One First Nations Band responded to the letter with names. Of the 52 names provided, 48 were already in the JMS database.
- CSB will be engaging the newly formed Aboriginal Justice Council for guidance and expertise on ways to improve the representation of Indigenous persons on jury panels.
- Priorities for the branch include:
  - engaging Indigenous groups and stakeholders on the approach to improving indigenous representation on jury panels;
  - ensuring the juror database has adequate representation of Indigenous persons;
  - targeting Indigenous communities with outreach activities aimed at increasing the awareness of the jury system and the role of juries in the justice system; and
  - improving the usability of public facing technology and forms.

**OTHER MINISTRIES IMPACTED/CONSULTED:**

- N/A

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s.17

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**MINISTRY OF ATTORNEY GENERAL  
JUSTICE SERVICES BRANCH  
BRIEFING NOTE**

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**PURPOSE:** For DECISION of Richard J. M. Fyfe, QC  
Deputy Attorney General

**ISSUE:**

The Attorney General has committed to asking Dr. Peter German to investigate the use of Builders Liens to launder money.

**RECOMMENDATION:**

Make Dr. German aware that the British Columbia Law Institute (BCLI) will be publishing a consultation paper proposing amendments to the *Builders Lien Act* (the "Act") that will address concerns that the Act could be used to facilitate money laundering.

**SUMMARY:**

- In response to a story about unregulated private lenders using mortgages and builders' lien registrations to launder drug money through Vancouver real estate (Appendix A), the Attorney General pledged to broaden the scope of Dr. German's ongoing independent investigation into money laundering in British Columbia casinos to include the use of land charges to launder money.
- The BCLI has established a Builders Lien Act Reform Project Committee (the "BCLI Committee") to consider and propose amendments to the *Builders Lien Act*. This committee has developed a proposal that addresses the concern raised in the news story regarding how the *Builders Lien Act* could be used to launder money.
- The BCLI contacted the Ministry of Attorney General asking that Dr. German be made aware of their proposals, to prevent duplication of effort.

## BACKGROUND:

- On February 16, the Globe and Mail published a story about unregulated private lenders using mortgages and builders' lien registrations to launder drug money through Vancouver real estate.
- On February 17, in a follow-up article in the Globe and Mail (Appendix B), it was reported that the Attorney General "pledged to use The Globe's data to broaden the scope of an ongoing independent investigation into money laundering in B.C. casinos."
- On February 19, during an interview on CBC Radio One, the Attorney General reiterated his commitment to refer the matter of private lending and use of land charges to launder money to Dr. German to investigate.
- A point made by Kathy Tomlinson, writer of the Globe and Mail articles, in the CBC interview was that borrowers would not necessarily know that a builder's lien had been filed against the property, and that claims of lien are often not disputed.
- The issue of notice of liens relates to a private member's bill from 2015, introduced by independent MLA Vicki Huntington, proposing that owners be notified by a person who intends to file a lien, before that person would be permitted to file the lien (the *Builders Lien Notice to Owners Act*).
- The BCLI Committee analyzed the proposed *Builders Lien Notice to Owners Act* and concluded that the *Builders Lien Notice to Owners Act* contemplated something that was unworkable, because it required a lienholder to personally serve anyone coming within the definition of "owner" before filing a lien.
  - In the proposed legislation "owner" would include individuals with unregistered equitable interests, wherever they happen to be in the world.
  - Moreover, even if all owners were registered and located in British Columbia, requiring personal service would allow a dishonest landowner to avoid the filing of a lien in proper circumstances, simply by avoiding service.
- The BCLI Committee came up with an alternative for notification. The BCLI Committee will be proposing that the Land Title Office be required to notify registered owners when a lien is registered. The Land Title Office currently informs registered owners of any charges registered against their land, if they file a specific request and pay an additional fee. The proposed amendment would require this existing service be provided for all builders liens without the requirement for a specific request (or fee).
  - This alternative will be one of the recommendations on changes to the *Builders Lien Act* in an upcoming consultation document currently being prepared by the BCLI.
- Essentially, the BCLI Committee has developed a proposal that addresses the particular issue with the *Builders Lien Act* identified in the Globe and Mail article,

namely the fact that a claim of lien may appear on a title without the owner's knowledge.

- The BCLI Committee will also recommend making the procedure for removing liens from titles more efficient. This should also help prevent misuse of the *Builder's Lien Act* to launder money, provided that the owner isn't complicit or acquiescing in the scheme.
- The BCLI contacted the Ministry of Attorney General asking that Dr. German be made aware of their BCLI Committee and, currently unpublished proposals that may address the money laundering issues that have been raised.
- The BCLI offered to contact Dr. German directly and has indicated that they are willing to discuss their proposal with Dr. German, should he contact them.

#### **DISCUSSION:**

The BCLI is concerned that if the matter of Builders Liens is referred to Dr. German, without information about the BCLI Committee's recommendations, he may propose amendments that reproduce the *Builders Lien Notice to Owners Act*.

#### **OPTIONS:**

1. Make Dr. German aware of the BCLI Committee and suggest that he contacts the BCLI to inquire about their proposed amendments that may address concerns that the *Builders Lien Act* may be used to facilitate money laundering. -

##### **RECOMMENDED**

##### **Advantages:**

- Prevents duplication of effort;
- Prevents Dr. German from making recommendations contrary to the BCLI proposals.

##### **Disadvantages:**

- None known.

2. Do not inform Dr. German of the BCLI project.

##### **Advantages:**

- Does not fetter Dr. German's discretion;
- May result in an innovative solution not considered by the BCLI.

##### **Disadvantages:**

- Duplicates effort.

**RECOMMENDED OPTION APPROVED**

**DATE:**



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Richard J. M. Fyfe, QC  
Deputy Attorney General

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March 9, 2018

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**Attachments:**

Globe and Mail article 1  
Globe and Mail article 2

## APPENDIX A

# **B.C. vows crackdown after Globe investigation reveals money-laundering scheme**

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Page 14 to/à Page 25

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IN DEPTH

## **Shady acres: The full list of properties investigated by The Globe and Mail**

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NOTE: For a list of the properties investigated by The Globe and Mail, please go to the bottom of the following website:

<https://www.theglobeandmail.com/news/investigations/real-estate-money-laundering-and-drugs/article38004840/>

## APPENDIX B

# B.C. attorney-general decries fentanyl link in Globe's money-laundering investigation

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BEN NELMS/THE GLOBE AND MAIL

**KATHY TOMLINSON**

VANCOUVER

PUBLISHED FEBRUARY 17, 2018    UPDATED FEBRUARY 17, 2018

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Page 28 to/à Page 29

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① MEDIA PLAN

② MJD NOTICE

Cliff: 430354

Date Prepared: October 25, 2017

Date Required: November 3 2017

**MINISTRY OF ATTORNEY GENERAL  
GAMING POLICY AND ENFORCEMENT BRANCH  
BRIEFING NOTE**

**PURPOSE:** For DECISION of the Honourable David Eby, QC, Attorney General

**ISSUE:** Transfer of full responsibility of the GameSense Advisor (GSA) Program to the British Columbia Lottery Corporation (BCLC); and redirect Gaming Policy and Enforcement Branch (GPEB) funding to enhance problem gambling treatment programs.

**DECISION REQUIRED/ RECOMMENDATION:** Transfer the GSA Program to BCLC and retain \$1.2 million within GPEB for costs of anticipated increased demand for problem gambling services and expansion to broaden the continuum of services.

**SUMMARY:**

- An independent evaluation recommended the GSA Program be transferred to BCLC, resolving challenges presented by the BCLC / GPEB co-management model. GPEB and BCLC support the transfer.
- Because BCLC is willing to assume the \$1.2 million cost of the GSA Program, the program transfer provides an opportunity for GPEB to retain the GSA Program funding to address existing service gaps and fund anticipated increases in demand for services for at-risk gamblers.

**BACKGROUND:**

- GPEB and BCLC established Responsible Gambling Information Centres (RGIC) in 2005 as a point of contact to provide B.C. casino patrons with information about responsible gambling (RG) and problem gambling (PG) services and resources.
- In 2009, BCLC rebranded RGICs as GameSense Information Centres (GSIC) and RGOs as GameSense Advisors (GSAs). GSICs operate under a co-management model where BCLC is responsible for site management while GPEB is responsible for contracting GSAs. There are currently 24 GSAs in 17 casinos in B.C.
- In October 2013, the Provincial Health Officer (PHO) released a report entitled *Lower the Stakes: A Public Health Approach to Gambling in British Columbia*.<sup>1</sup> The report found the problem gambling program in B.C. meets the needs of a fraction of people with gambling problems and problem gamblers generate a disproportionate amount of gambling revenue. The report made 17 recommendations, including the following:
  - Improve the capacity of BCLC staff to actively identify and respond to problem gamblers in its venues, including Community Gaming Centres (CGCs); and,
  - Allocate at least 1.5 % of gaming revenue to RG and PG initiatives.

<sup>1</sup> *Lower the Stakes: A Public Health Approach to Gambling in British Columbia*

- In 2014, the Ministry of Finance released the *British Columbia Problem Gambling Prevalence Study*<sup>2</sup>, which indicated that 125,000 British Columbians experience negative consequences as a result of gambling.
- In February 2015, government released its Plan for Public Health and Gambling<sup>3</sup> (the Plan). GPEB, the Ministries of Health and Education, and BCLC collaborated to develop the Plan, taking into consideration the PHO report, the Prevalence Study and relevant research. The Plan included a commitment to expand the GSA Program to 19 CGCs. The expectation at the time was for GPEB and BCLC to work together to implement GSAs into CGCs, providing the same level of service as casinos. BCLC planned to fund the expansion within its 2015/16 budget.
- In July 2016, the Responsible Gambling Council (RGC) was contracted by GPEB and BCLC to evaluate the co-management program structure and delivery of the GSA Program and recommend a preferred service delivery approach. The RGC report recommends transferring responsibility for the GSA Program to BCLC.
- BCLC has already included the cost of \$1.95 million<sup>4</sup> for taking over and expanding the GSA Program in their Annual Service Plan for 2018/19. Attorney General David Eby provided verbal support for this funding source as well as the transfer of the GSA Program to BCLC at an August 22, 2017 meeting.

## DISCUSSION:

### ***GSA Program Challenges***

- A number of issues with the GSA Program are identified in the RGC Report, including the BCLC / GPEB co-management model leading to a lack of clarity with respect to GSA oversight and lack of GSA performance management.
- According to the RGC Report, transferring the GSA Program would allow for greater efficiency, role clarity and performance accountability. Given that GSAs spend between 70% and 80% of their time on RG as opposed to PG services, BCLC would assume the primary role of delivering RG services to patrons in casinos. This provides an opportunity for GPEB to enhance PG services to address existing service gaps if funding is retained.
- Enhancing PG services is significant because B.C. spends less per capita than almost all provinces on RG and PG services and far less than recommended by the PHO. *Figure 1* shows the total (both core government and Crown Corporation) per capita expenditure on RP and PG services across provinces for which data is available. Also included is the per capita expenditure if B.C. met the PHO recommendation of 1.5% of net provincial gaming revenue.

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<sup>2</sup> 2014 B.C. Problem Gambling Prevalence Study

<sup>3</sup> Responsible and Problem Gambling in B.C. – A Plan for Public Health and Gambling in B.C. February 2015

<sup>4</sup> \$1.2 million to take over existing GSA Program and \$750,000 to expand program to CGCs

**Figure 1. Total per capita expenditure on responsible and problem gambling  
(FY 2015/16)<sup>5</sup>**

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- Current RPG funding (total expenditure = \$9.33 million, 0.71% of net gaming revenue to government)
  - RPG funding with expansion of GSA to CGCs (total expenditure = \$10.08 million, 0.76% of net gaming revenue to government)
  - RPG funding with expansion of GSA to CGCs and retention of current GSA program expenditure (total expenditure = \$11.28 million, 0.86% of net gaming revenue to government)
  - PHO recommendation (total expenditure = \$19.7 million, 1.5% of net gaming revenue to government)
- 
- The most significant risk of transferring responsibility for GSAs to BCLC is a real and perceived conflict of interest between assisting players with gambling problems while at the same time having responsibility for generating gambling revenue. This risk could be mitigated by requiring BCLC to report out regularly to GPEB on pre-determined GSA Program performance targets and GPEB performing regular audits of program performance.
  - Of the four Canadian provinces reviewed in the RGC report, three (Ontario, Manitoba and Nova Scotia) contract a third party to deliver RG/PG services in casinos while

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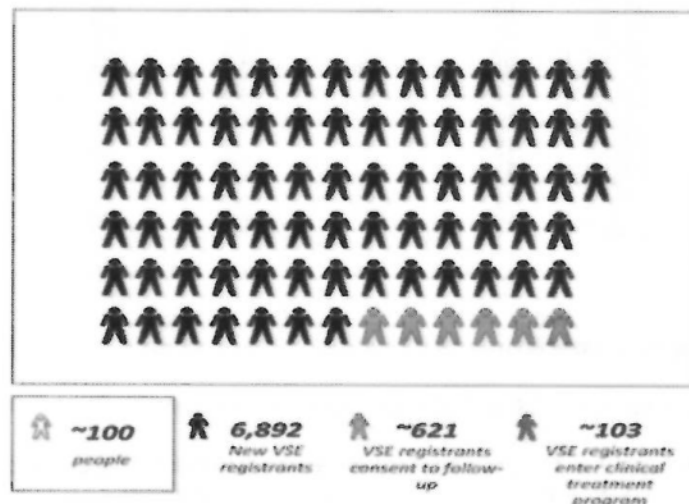
<sup>5</sup> Source - Gambling Digest 2015/16, produced by the Canadian Partnership for Responsible Gambling (data not available for AB and NL).

Saskatchewan's Crown Corporation is responsible for operating two casinos and delivers RG/PG services in those casinos directly.

### Referral Gaps

- GPEB has identified areas within its PG program where the funding from the GSA Program could be reallocated to address critical service gaps.
- GPEB's clinical treatment program reaches a fraction of the people who experience problem gambling. In 2016/17 the program provided counselling and treatment services to 1,390 people, which represents 1.1% of the estimated 125,000 problem gamblers in B.C.
- In addition, GPEB's treatment program reaches a fraction of the people who have signed up for BCLC's Voluntary Self-Exclusion (VSE) program.<sup>6</sup> In 2016/17, BCLC had 6,892 new VSE registrants. Only 9% (621) of these registrants agreed to a follow up call with GPEB's RG/PG program and only 1.5% booked an appointment for clinical counselling.

**Figure 2. Individuals who sign up for VSE and access GPEB service**



- In casinos, GSAs are trained to identify and intervene when a person may be experiencing problems with gambling. This same support is not available to players who gamble online. British Columbians have access to thousands of online gambling websites, over which GPEB does not have regulatory authority. Even on BCLC's online gambling site, PlayNow.com, there is no intervention for players that show clear signs of distress.

<sup>6</sup> BCLC's Voluntary Self Exclusion Program is available to individuals who want to exclude themselves from gambling activities in order to help them control their gambling behavior. At the time of enrollment, individuals can choose the time period of their exclusion, ranging from six months to three years and they can choose the type of gambling activities for their exclusion, including facilities with slot machines, commercial bingo halls or PlayNow.com. They are also ineligible to be paid for any jackpot prize they may win while enrolled in the program.

- Research exploring the trends and tendencies of Internet gamblers suggests that online gamblers are at increased risk of problem gambling.<sup>7</sup> Given the continued increase in online gambling, the need to provide PG services to online players will only grow.

### ***Continuum of Service and Increased Demand***

- The Plan includes GPEB's commitment to updating its Responsible Gambling Standards to include online gambling. These standards will include the requirement for BCLC to connect with players who are displaying signs of distress and make referrals to PG services as appropriate. This is expected to increase demand for GPEB's PG services.
- It is anticipated the expansion of the GSA Program to CGCs will also increase the demand for GPEB's PG services through GSAs referrals.
- The Office of the Superintendent of Bankruptcy Canada has recently recommended to B.C. bankruptcy trustees that they make accessing counselling services a condition of bankruptcy discharge where problem gambling is a causal factor in bankruptcy. GPEB anticipates increased demand for counselling services as a result of these referrals.
- GPEB also anticipates increased demand for counselling services because of plans to implement follow-up calls to individuals who sign up for the VSE Program. At the time of self-exclusion, VSEs are required to opt-in to indicate whether they would like to receive follow-up calls after they have self-excluded. These follow-up calls provide program participants with the opportunity to connect with GPEB's treatment services.
- Instead of requiring VSE Program participants to opt-in to follow-up calls, GPEB is recommending that BCLC change the VSE process so that participants will automatically receive a follow-up call unless they specifically choose to opt-out. This automatic opt-in approach has been shown to increase service uptake in other business areas. GPEB estimates there will be an increase of 25-50% in the number of new VSE participants being contacted by GPEB and approximately 8% increase in VSE participants receiving clinical counselling services.<sup>8</sup>
- GPEB's problem gambling services include free one-to-one clinical counselling as well as intensive day-treatment programs. GPEB does not have a continuum of service for people who are suffering harms from gambling but are not ready for or in need of full treatment.
- The cost per client for counselling is relatively high and may not be the right referral path for every individual experiencing gambling related harms. Supplementing current services with a greater continuum of service would allow GPEB's PG services to reach a greater number of people at lower cost per client.

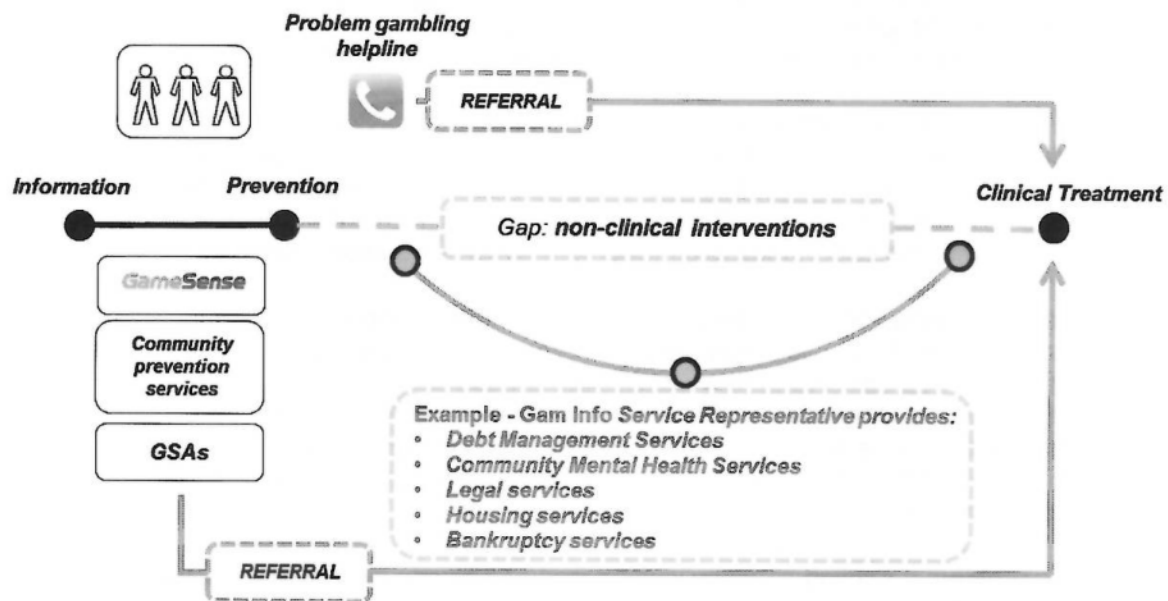
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<sup>7</sup> 2014 B.C. Problem Gambling Prevalence Study

<sup>8</sup> GPEB estimates this approach would result in an increase to the number of individuals who agree to this follow-up discussion of **25-50%**, or between approximately **155** and **310**  $[(X*9\%)*25\%]-[(X*9\%)*50\%]$  additional VSE registrants. GPEB also estimates between approximately 25 and 50 additional VSE registrants would be directed to the clinical treatment program annually under this approach.

- GPEB is piloting a mobile, early-intervention service in the Lower Mainland to support at-risk gamblers. The Gam Info Rep Service Pilot is a support service that provides information, interim counselling, and referrals and accompaniment to resources, including bankruptcy, legal, housing, community mental health and debt management services. The Gam Info Rep works closely with GSAs, counsellors, prevention specialists and the bc211 Helpline<sup>9</sup>, providing in-person, over-the-phone, live-text and chat support services.
- The Gam Info Rep Service Pilot gives problem gamblers the option to remain anonymous, addressing stigma and other barriers that deter people from seeking treatment. Expansion of this service to additional locations across the province is an example of how GPEB could address existing service gaps and offer a broader continuum of service. *Figure 3* shows the existing continuum of services offered in B.C., the existing gaps and an example of how the service gap could be filled.

**Figure 3. RG and PG service continuum**



#### **OPTIONS:**

**Option 1:** Transfer the GSA Program to BCLC and retain \$1.2 million within GPEB for cost of addressing existing service gaps (e.g. expansion of the Gam Info Rep Service Pilot) and projected increased demand for PG services.

#### **Implications:**

- Both GPEB and BCLC support the transfer of the GSA Program to BCLC;
- Meets government commitment to expand GSA Program to CGCs;

<sup>9</sup> bc211 is a confidential, multilingual telephone and texting service that provides free information and referral to a full range of community, social, and government services, and operates twenty-four hours a day, seven days a week.

- Increased funding aligns with PHO recommendation to increase spending on RG / PG services, moving B.C. from .71% to .86% of net gaming revenue (see *Figure 1*);
- Addresses lack of clarity in GSA oversight and performance management by eliminating the co-management structure;
- Allows GPEB to meet anticipated increase in demand for PG services; and,
- Allows GPEB to address existing service gaps and delivers a broader continuum of service that meet the changing needs of at-risk gamblers at a lower cost per client.

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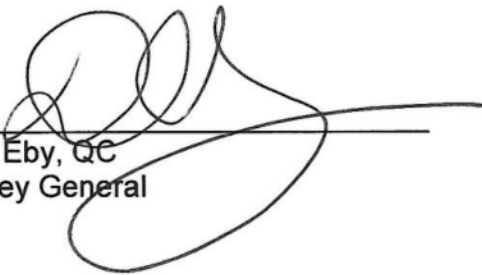
**RECOMMENDATION: Option 1**



Richard J. M. Fyfe, QC  
Deputy Attorney General

October 30, 2017

**OPTION 1 APPROVED**



David Eby, QC  
Attorney General

**DATE:**

October 31, 2017



Cliff: 430354

Date Prepared: October 25, 2017

Date Required: November 3 2017

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s.17

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s.17