

Vander Graaf, Larry P EMNG:EX

From: Vander Graaf, Larry P EMNG:EX
Sent: Tuesday, July 23, 2013 10:14 AM
To: McCrea, Bill J EMNG:EX
Subject: RE: Strategic Priority Measurements

Importance: High

Bill,

I am not comfortable with the second measure in the AML Strategy measurement. I understand what you are saying but I believe that it is too broad. First bullet is provide the enhancements. I believe the second bullet should be, "Significantly reduce and limit the amount of Suspicious Currency Transactions as well as significantly reduce or limit the amount of Suspicious Currency to prevent money laundering and the perception of money laundering in BC Casinos." I must also point out that should this Division be presented with a situation or opportunity to deter, prevent, or deter money laundering or any perception of money laundering we would be compelled, with the limited capability we possess, to investigate as appropriate.

I also point out, as you are aware, that the Investigation Division will continue to monitor the Section 86 GCA SCT reporting by the Service Provider and report out to the AML Working Group, you and the ADM.

These are my comments on the measurement. I leave it to you and Doug....

Larry

*Larry Vander Graaf, Executive Director
Investigations and Regional Operations
Gaming Enforcement
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From: McCrea, Bill J EMNG:EX
Sent: Friday, July 19, 2013 3:05 PM
To: Vander Graaf, Larry P EMNG:EX
Subject: Strategic Priority Measurements

Hi Larry,

As discussed here are my proposed measures for the two strategic initiatives that you and I are responsible for sponsoring.

Please give me your thoughts. Thanks

Key Initiative	How We Will Measure Success
Implement a comprehensive anti-money laundering strategy.	<ul style="list-style-type: none"> • Continue to develop and implement new enhancements that facilitate access to funds inside gaming facilities. • Significantly reduce and limit the amount