

**CULLEN COMMISSION OF INQUIRY INTO  
MONEY LAUNDERING IN BRITISH COLUMBIA**

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**REPLY SUBMISSIONS**

**GREAT CANADIAN GAMING CORPORATION  
and its subsidiaries**

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## I. Introduction

1. Great Canadian Gaming Corporation (“**Great Canadian**”) filed its closing submissions with the Commission on September 28, 2021 (“**Closing**”). The following submissions are in reply to those provided by participants and others. For clarity, Great Canadian adopts the capitalized terms used in its Closing.

## II. Reply to Canada

2. The submissions of the Government of Canada (“**Canada**”) at paragraph 83 refer to money laundering threats and vulnerabilities related to legal and illegal gambling activities.<sup>1</sup> Great Canadian denies the assertion that casino patrons in British Columbia are able to engage in transactions with relative anonymity. It is inconsistent with the extensive identification, tracking, and reporting requirements, as well as the extensive surveillance conducted by casinos, for all large or suspicious transactions.<sup>2</sup> Further, this paragraph of Canada’s submissions suggests that a risk factor is that casinos are able to transfer funds electronically, including to high-risk jurisdictions. Legal casinos in British Columbia, including all of those operated by Great Canadian, are subject to strict reporting rules regarding both disbursements and foreign exchange.<sup>3</sup> No evidence was tendered at this hearing to demonstrate that these rules were inadequate, or that electronic transfers from legal casinos in any way contributed to money laundering or were otherwise inappropriate.

## III. Reply to Province

3. The gaming sector submissions advanced by Her Majesty the Queen in Right of the Province of British Columbia (the “**Province**”) refer to the impact of a spreadsheet created by two GPEB investigators in August 2015 to track large cash transactions.<sup>4</sup> While this spreadsheet may have been responsible for further actions taken by both GPEB and the Province, Great Canadian and BCCLC were engaged in significant efforts

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<sup>1</sup> Closing Submissions of the Government of Canada dated July 9, 2021 at para. 83 [*Canada Closing Submissions*].

<sup>2</sup> See Great Canadian Closing at paras. 34 – 41 and 85.

<sup>3</sup> [Exhibit 76](#), Overview Report: BCCLC Standards, Policies, Procedures and Operational Services Agreements, Appendix A at Article 1-1.4.

<sup>4</sup> Closing Submissions of Her Majesty the Queen in Right of the Province of British Columbia (Gaming Sector) dated Sept. 28, 2021 at para. 38 [*Province Closing Submissions (Gaming Sector)*].

to respond to large cash transactions long before the creation of the spreadsheet. This included repeated requests for law enforcement support.<sup>5</sup> Indeed, this spreadsheet was not created until after both BCLC and GPEB had been advised by Inspector Chrustie that the RCMP was engaged in a criminal investigation related to activities around RRCR.<sup>6</sup>

4. At paragraphs 57 and 58 of the Province's submissions, there is reference to an incident in 2009 where a former operational employee of RRCR, Rick Duff, took the position with a BCLC investigator that a casino patron should not be barred for using a cash facilitator. Rather, he believed the cash facilitator should be banned, and BCLC came to agree with him.<sup>7</sup> Mr. Duff's viewpoint was that, provided all regulatory reporting requirements were met, legitimate patrons should not be banned. However, he was in full agreement with the removal and banning of cash facilitators.<sup>8</sup> Great Canadian submits that this type of back and forth discussion between service providers and BCLC investigators was entirely appropriate. It constituted a transparent and mutually beneficial sharing of information and dialogue regarding the AML risks associated with cash facilitation. As Mr. Duff explained in his testimony, he sometimes agreed with BCLC's banning recommendations and sometimes he wholeheartedly disagreed.<sup>9</sup> However, Mike Hiller, the BCLC investigator, confirmed that if he had made a final decision to ban a player, he would not change his decision just because Great Canadian may have liked him to.<sup>10</sup>

5. These same paragraphs of the Province's submissions reference a patron, Jia Gao, who was placed on cash conditions by BCLC in April 2015.<sup>11</sup> The Province submits that Mr. Gao was not banned from play by BCLC when he attempted to

<sup>5</sup> See Great Canadian Closing at paras. 63 – 67.

<sup>6</sup> [Exhibit 148](#), Tottenham Affidavit #1, Ex. 43 p. 405; [Transcript, D. Tottenham, Nov. 4, 2020](#) at p. 175 (lines 5-22); [Transcript, D. Tottenham, Nov. 10, 2020](#) at pp. 81 (line 13) – 82 (line 1) and p. 143 (lines 4-22); [Transcript, B. Desmarais, Feb. 1, 2021](#) at pp. 120 (line 16) – 123 (line 4); and [Transcript, L. Meilleur, Feb. 12, 2021](#) at pp. 59 (line 3) – 63 (line 11).

<sup>7</sup> Province Closing Submissions (Gaming Sector) at paras. 57 – 58.

<sup>8</sup> [Transcript, R. Duff, Jan. 25, 2021](#) at p. 41 (lines 2-23).

<sup>9</sup> [Transcript, R. Duff, Jan. 25, 2021](#) at pp. 40 – 44.

<sup>10</sup> [Transcript, M. Hiller, Nov. 9, 2020](#) at p. 109 (lines 2 - 14).

<sup>11</sup> Province Closing Submissions (Gaming Sector) at para. 58.

contravene conditions placed upon him.<sup>12</sup> However, Great Canadian took the initiative to refuse transactions from Mr. Gao, even though the transactions may not have been strictly contrary to the prohibitions placed by BCLC on Mr. Gao.<sup>13</sup>

6. The submissions of the Province at paragraphs 62 and 104 suggest that GPEB's Investigation Division communicated regularly with service providers regarding risks related to money laundering and proceeds of crime.<sup>14</sup> Great Canadian disagrees with this submission. It is inconsistent with the Province's own admission at paragraph 96 where the Province states that there was a "lack of direct involvement" by GPEB with service providers, including about money laundering risks and AML efforts.<sup>15</sup> It is further inconsistent with the testimony of multiple members of the GPEB Investigation Division who were clear in their evidence that the GPEB Investigation Division did not communicate the information they received regarding money laundering risks to Great Canadian.<sup>16</sup>

7. Of note, the submissions of the Province at paragraph 104 reference a letter dated April 14, 2010 from GPEB's Mr. Dickson to BCLC's Mr. Friesen as an example of the communications between GPEB and service providers about money laundering.<sup>17</sup> Although the letter mentions money laundering and suspicious transactions, it focuses only on loan sharking and chip passing in violation of BCLC policy.<sup>18</sup>

8. The second example cited about GPEB interactions with service providers is the testimony of Rob Barber where Mr. Barber says he provided "soft suggestions" about unspecified matters to them. However, he never issued any directions because his impression was that his directions might not be followed. The testimony cited makes no

<sup>12</sup> Province Closing Submissions (Gaming Sector) at para. 58.

<sup>13</sup> [Transcript, D. Tottenham, Nov. 4, 2020](#) at pp. 149 (line 12) – 159 (line 23); [Transcript, D. Tottenham, Nov. 10, 2020](#) at pp. 85 (line 6) – 87 (line 3) and 194 (line 6) – 196 (line 15).

<sup>14</sup> Province Closing Submissions (Gaming Sector) at para. 62 and 104.

<sup>15</sup> Province Closing Submissions (Gaming Sector) at para. 96.

<sup>16</sup> [Transcript, L. Vander Graaf, Nov. 12, 2020](#) at p. 88 (lines 19 - 24); [Transcript, L. Vander Graaf, Nov. 13, 2020](#) at p. 57 (lines 2 - 24); [Transcript, K. Ackles, Nov. 2, 2020](#) at p. 119 (lines 8 – 16); [Transcript, D. Dickson, Jan. 22, 2021](#) at pp. 53 (line 25) – 54 (line 15).

<sup>17</sup> Province Closing Submissions (Gaming Sector) at para. 104.

<sup>18</sup> [Exhibit 108](#).

reference to any communications to service providers regarding money laundering or proceeds of crime.<sup>19</sup>

9. The only other examples given are a single meeting held with service provider CEOs when the internal GPEB “x-dwg” working group was established (and for which there is no evidence of what was discussed with service providers) and service provider participation in the PGF pilot project introduced by BCLC.<sup>20</sup> Great Canadian submits that the Province’s very limited examples of communications with service providers undermine the assertion by the Province that GPEB communicated regularly regarding money laundering risks and AML efforts.

10. The Province at paragraph 153 faults service providers for accepting cash where patrons only provided general responses to source of funds questionnaires required by BCLC.<sup>21</sup> There is no basis for this criticism. Service providers were not asked by BCLC to verify the response given by patrons and were not asked to refuse buy-ins (unless there were other circumstances requiring a refusal). The direction by BCLC to service providers was to simply ask the questions, document the information, and provide the information to BCLC for further consideration.<sup>22</sup>

11. At paragraph 154, the Province describes Cheryl Wenezenki-Yolland as testifying that she “received reports from staff that source of funds inquiries were not necessarily happening consistently, and concerns remained around suspicious cash transactions.”<sup>23</sup> In fact, Ms. Wenezenki-Yolland did not testify as to any concerns regarding source of funds inquiries. What she said was the “application” of source of funds was not necessarily happening consistently – ie. that BCLC was targeting only specific players. Ms. Wenezenki-Yolland did not criticize the source of funds inquiries performed by service providers. Ms. Wenezenki-Yolland further testified that she was not aware of the specifics of how BCLC was implementing source of funds

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<sup>19</sup> [Transcript, R. Barber, Nov. 3, 2020](#) at p. 8 (lines 1-16).

<sup>20</sup> Province Closing Submissions (Gaming Sector) at para. 104.

<sup>21</sup> Province Closing Submissions (Gaming Sector) at para. 153.

<sup>22</sup> [Transcript, D. Tottenham, Nov. 10, 2020](#) at pp. 12 (line 16) - 14 (line 22).

<sup>23</sup> Province Closing Submissions (Gaming Sector) at para. 154.

requirements, but that she could clearly see a very significant downward decline in suspicious cash transactions.<sup>24</sup>

12. In reply to the Province's submissions at paragraphs 159 to 162<sup>25</sup> regarding the historical 50 000 dollar threshold issue, this underreporting was discovered by BCLC in late 2015 and disclosed to FINTRAC.<sup>26</sup> A comprehensive review was then undertaken by BCLC of over 20 000 transactions to identify any large cash transactions that should also have been reported by Great Canadian to BCLC as UFTs, and in turn, by BCLC to FINTRAC as STRs. BCLC identified 266 such large cash transactions that were reported as only LCTs, but should also have been reported to FINTRAC as STRs. This represented an error rate of approximately 1.3% of all LCT reports filed by RRCR between September 2014 and October 2015.<sup>27</sup>

13. Despite the testimony of numerous witnesses regarding the underreporting, it remains unclear how or why it developed at RRCR, and how or why it continued.<sup>28</sup>

14. GPEB employees testified that they were aware that a threshold was being applied by some RRCR employees, and that they were aware that transactions conducted in 100 dollar bills may be underreported.<sup>29</sup> Mr. Barber explains in his affidavit that he was made aware of this practice by multiple individuals at BCLC and Great Canadian and he recalls the practice continuing over an extended period of time. Mr. Barber does not identify when he discovered the issue or when he raised his concerns with Great Canadian employees, other than to say he had conversations with Great Canadian.<sup>30</sup> Mr. Barber's testimony at the hearings was that he reported this concern about thresholds to his superior, Larry Vander Graaf, who told him to focus on 20 dollar

<sup>24</sup> [Transcript, C. Wenezenki-Yolland, Apr. 27, 2021](#) at p. 125 (line 24) – 127 (line 18).

<sup>25</sup> Province Closing Submissions (Gaming Sector) at paras. 159 - 162.

<sup>26</sup> [Exhibit 75](#), Overview Report: 2016 BCLC Voluntary Self-Declaration of Non-Compliance, Appendix A.

<sup>27</sup> [Exhibit 75](#), Overview Report: 2016 BCLC Voluntary Self-Declaration of Non-Compliance, Appendixes F and G.

<sup>28</sup> Dr. German reached the same conclusion: [German Report #1](#) at paras. 673-677.

<sup>29</sup> [Transcript, R. Barber, Nov. 3, 2020](#) at pp. 22 (line 13) – 23 (line 4) and pp. 48 (line 20) – 50 (line 22); [Transcript, D. Dickson, Jan. 22, 2021](#) at pp. 16 (line 17) – 18 (line 12) and p. 28 (lines 1-6).

<sup>30</sup> [Exhibit 145](#), Affidavit #1 of R. Barber made October 29, 2020 at paras. 73-77; [Transcript, R. Barber, Nov. 3, 2020](#) at pp. 90 (line 21) – 92 (line 14).

bills and “leave it” because it was a secondary or tertiary issue.<sup>31</sup> Mr. Vander Graaf denied both having knowledge of the non-reporting and saying that it was a secondary issue.<sup>32</sup>

15. Further, an audit was conducted by GPEB in December 2013 that addressed this very issue. The audit report was distributed internally to senior GPEB personnel, including John Mazure, Bill McCrea, Larry Vander Graaf, and Derek Dickson. It specifically notes that “GPEB Investigations believes service providers may not be consistently identifying suspicious transactions for large transactions greater than \$20,000 and less than \$50,000.” The audit is inconclusive as to whether suspicious transactions were being fully reported by service providers, but a number of recommendations were made for GPEB to improve its oversight of service providers.<sup>33</sup> Notably, Mr. Dickson testified that subsequent to this audit in 2013, GPEB had discussions with BCLC about its concerns but no attempt was made by GPEB to raise the issue directly with Great Canadian.<sup>34</sup>

16. The testimony of various BCLC witnesses, together with contemporaneous emails, also indicate that a number of BCLC employees knew that a threshold approach was being used by at least some RRCR employees.<sup>35</sup> During the time period at issue, RRCR provided BCLC investigators with paperwork from the cash cage on a daily or weekly basis that detailed all cash transactions completed at the cage, including the amount of buy-ins, the denominations of the bills, and the number of bills in each denomination. BCLC investigators regularly reviewed these records. BCLC investigators

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<sup>31</sup> [Transcript, R. Barber, Nov. 3, 2020](#) at pp. 48 (line 20) – 50 (line 22).

<sup>32</sup> [Transcript, L. Vander Graaf, Nov. 12, 2020](#) at pp. 155 (line 25) – 157 (line 23).

<sup>33</sup> [Exhibit 75](#), Overview Report: 2016 BCLC Voluntary Self-Declaration of Non-Compliance, Appendix L.

<sup>34</sup> [Transcript, D. Dickson, Jan. 22, 2021](#) at p. 62 (lines 10-21) and pp. 77 (line 4) – 79 (line 3).

<sup>35</sup> [Transcript, S. Beeksma, Oct. 26, 2020](#) at pp. 97 (line 7) – 105 (line 1); [Transcript, G. Friesen, Oct. 28, 2020](#) at pp. 77 (line 22) – 81 (line 2) and pp. 148 (line 18) – 153 (line 21); [Transcript, G. Friesen, Oct. 29, 2020](#) at pp. 21 (line 24) – 34 (line 13); [Transcript, J. Karlovcev, Oct. 29, 2020](#) at pp. 146 (line 3) – 158 (line 6); [Exhibit 75](#), Overview Report: 2016 BCLC Voluntary Self-Declaration of Non-Compliance, Appendixes E, I, and J; [Exhibit 84](#); [Exhibit 107](#); [Exhibit 113](#).

also reviewed surveillance footage which showed the denominations of bills used for large cash buy-ins.<sup>36</sup> Nothing was concealed by Great Canadian.

17. What is indisputable from the evidence is that there was no intention to deceive. Nobody at RRCR recognized that there was an issue with the reporting of these transactions.<sup>37</sup> Patrick Ennis testified that such reporting errors were never intentional.<sup>38</sup> However, as Terrance Doyle described, both he and Great Canadian's Board of Directors were very upset regarding the confusion over compliance requirements.<sup>39</sup> Fortunately, Great Canadian had complied with all of its LCT reporting requirements during this time period and as a result, BCLC was eventually able to report the suspicious transactions to FINTRAC, albeit late. FINTRAC did not impose any penalties or fines against BCLC.

18. No evidence was led during the course of the inquiry that any similar problems of underreporting have arisen at RRCR (or any other Great Canadian property) in the years since 2015.<sup>40</sup>

#### **IV. Reply to Len Meilleur**

19. The submissions of Len Meilleur at paragraph 52(f) suggest that an audit prepared by GPEB in April 2016 was of great concern to Robert Kroeker (then of BCLC) because service providers were knowingly permitting banned cash facilitators to attend at or near casinos, and effectively allowing them to continue their illicit activities. The submissions of Mr. Meilleur leave the erroneous impression that Mr. Kroeker was very concerned because of the actions or inactions of service providers.<sup>41</sup> In fact, the referenced evidence in Anna Fitzgerald's affidavit describes Mr. Kroeker as being concerned because he believed the findings of the audit were incorrect and were based on the inaccurate assumption that events were being live-monitored by surveillance. In

<sup>36</sup> [Transcript, M. Hiller, Nov. 9, 2020](#) at pp. 100 (line 8) – 104 (line 18), [Transcript, P. Ennis, Feb. 4, 2021](#) at p. 12 (lines 16-24); [Exhibit 530](#), Ennis Affidavit #1 at paras. 45-56.

<sup>37</sup> [Transcript, R. Kroeker, Jan. 26, 2021](#) at pp. 32 (line 22) – 33 (line 22) and pp. 124 (line 13) – 125 (line 12).

<sup>38</sup> [Transcript, P. Ennis, Feb. 4, 2021](#) at p. 21 (lines 18-25).

<sup>39</sup> [Transcript, T. Doyle, Feb. 10, 2021](#) at pp. 2 (line 7) – 8 (line 25).

<sup>40</sup> [Transcript, R. Kroeker, Jan. 26, 2021](#) at p. 124 (lines 5-12).

<sup>41</sup> Closing Submissions of L. Meilleur dated Sept. 28, 2021 at para. 52(f).

her affidavit, Ms. Fitzgerald acknowledged that the audit should not have said service providers were knowingly accepting cash.<sup>42</sup>

## **V. Reply to Brad Desmarais**

20. The submissions of Brad Desmarais refer at paragraph 53 to material notices of loss of revenue that Great Canadian issued immediately after BCLC implemented source of funds conditions on patrons in September 2015.<sup>43</sup> In his testimony, Mr. Desmarais repeatedly emphasized that notwithstanding the potential loss of revenue, service providers never pushed back on AML measures.<sup>44</sup>

21. Great Canadian's Mr. Doyle gave more detailed evidence about the long-term impacts of AML measures on VIP revenues and clarified that it was difficult to measure the impact of AML measures. As time went on, there was a reduction in large cash transactions following the implementation of source of funds requirements and that had some impact on the gross gaming revenues of RRCR.<sup>45</sup>

## **VI. Reply to BC General Employees' Union**

22. The submissions of the BC General Employees' Union ("BCGEU"), in large measure, are speculative and based on assertions of facts that are not supported by any evidence.<sup>46</sup>

23. Indeed, parts of the BCGEU's submissions are in conflict with the Commissioner's Ruling #29, which denied BCGEU's application to introduce evidence through a panel.<sup>47</sup> In that ruling, the Commissioner addressed the same factual allegations referred to in BCGEU's submissions from the bottom of page 3 to footnote 15 on page 6, as well as the submissions at pages 28 to 30 concerning working conditions. The Commissioner found that the evidence proposed by BCGEU in that

<sup>42</sup> [Exhibit 781](#), Affidavit #1 of A. Fitzgerald dated Mar. 3, 2021 at paras. 53 - 59, Ex. 54.

<sup>43</sup> Closing Submissions of B. Desmarais dated Sept. 24, 2021 at para. 53.

<sup>44</sup> [Transcript, B. Desmarais, Feb. 1, 2021](#) at pp. 133 (lines 1 – 8), 141 (lines 6 - 17), and 144 (line 6) – 145 (line 6).

<sup>45</sup> [Transcript, T. Doyle, Feb. 10, 2021](#) at pp. 59 (line 20) – 61 (line 19) and 97 (line 1) – 98 (line 22).

<sup>46</sup> Closing Submissions of the BC General Employees' Union dated Sept. 24, 2021.

<sup>47</sup> [Ruling #29 – Application to Admit Evidence Through a Panel](#) dated Mar. 12, 2021 [Ruling #29].

application was unreliable, vague, and not reasonably relevant.<sup>48</sup> BCGEU's closing submissions advancing these same allegations must be dismissed.

24. There is no admissible evidence before this Commission to support the assertions from the bottom of page 7 through to footnote 21 on page 8.

25. The submissions in the bottom two paragraphs on page 8 are speculative. There is no conclusive or compelling evidence about how widespread loan sharking was in British Columbia casinos, or that money laundering was taking place in the late 1990s. In any event, BCGEU has provided no cogent evidence relating to conduct that occurred at Great Canadian after Muriel Labine left the company in 2000.

26. The submissions on pages 22 to 28 relate to whistleblower policies. There is no evidence about what Great Canadian's whistleblower policy was, much less whether it was inadequate. As described in the Commissioner's Ruling #29, it may be possible that one or more employees feared retaliations<sup>49</sup>, but BCGEU failed to provide any reliable evidence on that. In any event, there is no evidence that any of the concerned employees worked for Great Canadian.

## **VII. Reply to British Columbia Civil Liberties Association**

27. The submissions of the British Columbia Civil Liberties Association reference testimony by the former Officer in Charge of the Integrated Illegal Gaming Enforcement Team ("IIGET"), Fred Pinnock, and his belief that his team was not welcome in casinos.<sup>50</sup> In fact, Mr. Pinnock testified that he never even went to any Great Canadian casino, including RRGR. His recollection that another police officer had told him he felt unwelcome is unreliable hearsay. Even if it were true, there is no evidence as to why the police officer felt unwelcome or why he believed he was followed by casino staff (which could have all sorts of positive explanations, including that casino staff may have been trying to assist the officer). Mr. Pinnock testified that he himself had never been

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<sup>48</sup> [Ruling #29](#) at paras. 59-61 and 66-68.

<sup>49</sup> [Ruling #29](#) at para. 72.

<sup>50</sup> Closing Submissions of the British Columbia Civil Liberties Associated dated July 8, 2021 at para. 116 [*BCCLA Closing Submissions*].

made to feel unwelcome at any Great Canadian casino. Mr. Pinnock also confirmed that during his tenure with IIGET, IIGET offered no assistance whatsoever to legal casinos.<sup>51</sup>

28. The uncontradicted evidence of Great Canadian's Mr. Ennis was that it was a positive thing to have police walkthroughs of Great Canadian casinos to enhance public safety and that that was a priority of Great Canadian.<sup>52</sup> Mr. Doyle likewise testified about the close working relationship between Great Canadian and the RCMP, and the commendations received because of Great Canadian's assistance with RCMP investigations. Great Canadian welcomes proactive onsite law enforcement.<sup>53</sup>

### **VIII. Reply to the Society of Notaries Public of BC**

29. The Society of Notaries Public of BC ("SNPBC") makes submissions at paragraphs 14 to 16 regarding problem gambling.<sup>54</sup> Those submissions are both outside of the grant of standing of SNPBC<sup>55</sup> and wholly unsupported by any evidence admitted before this Commission. The references said to support SNPBC's submissions are not in evidence and the issues canvassed therein are (by SNPBC's own admission) outside of the mandate of this Commission.

### **IX. Reliance on Dr. Stephen Schneider**

30. Several participants refer to the testimony and literature review of Dr. Stephen Schneider in their closing submissions.<sup>56</sup> Great Canadian submits that the Commission should be cautious when considering Dr. Schneider's evidence because his literature review, as it relates to gaming, is heavily reliant on media articles.<sup>57</sup> No steps were taken by Dr. Schneider to independently verify any underlying facts.<sup>58</sup> Indeed, Commission counsel expressly confirmed that the factual assertions and statements in

<sup>51</sup> [Transcript, F. Pinnock, Nov. 5, 2020](#) at pp. 144 (line 23) – 150 (line 7).

<sup>52</sup> [Transcript, P. Ennis, Feb. 3, 2021](#) at pp. 121 (line 13) – 122 (line 14).

<sup>53</sup> [Transcript, T. Doyle, Feb. 10, 2021](#) at pp. 57 (lines 7 - 24) and 68 (line 12) – 69 (line 7).

<sup>54</sup> Closing Submissions of the Society of Notaries Public of B.C. dated July 9, 2021 at paras. 14-16.

<sup>55</sup> [Ruling #1 – Applications for Standing](#) dated Sept. 24, 2019 at para. 40. SNPBC was granted standing with respect to the real estate and professional service sectors.

<sup>56</sup> For example, Canada Closing Submissions at paras. 10, 17 and BCCLA Closing Submissions at para. 102.

<sup>57</sup> [Transcript, Dr. S. Schneider, May 25, 2020](#); [Transcript, Dr. S. Schneider, May 26, 2020](#); [Transcript, Dr. S. Schneider, May 27, 2020](#); [Exhibit 6](#), Money Laundering in British Columbia: A Review of the Literature, May 11, 2020.

<sup>58</sup> [Transcript, Dr. S. Schneider, May 26, 2020](#) at pp. 62 (line 29) – 76 (line 44).

media reports summarized by Dr. Schneider were not being relied upon for the truth of their contents.<sup>59</sup>

31. All of which is respectfully submitted.

Dated at the City of Vancouver, Province of British Columbia, this 8<sup>th</sup> day of October, 2021.



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<sup>59</sup> [Transcript, Dr. S. Schneider, May 25, 2020](#) at pp. 7 (line 41) – 8 (line 16).