



April 22, 2022

To: British Columbia Lottery Corporation (BCLC) All Registered Gaming and eGaming Service Providers

Re: **Reporting to the General Manager by BCLC and Gaming Service Providers Section 86(2) *Gaming Control Act*, and Section 34(1)(t) *Gaming Control Regulation* (as applicable)**

This Memorandum consolidates and replaces the Memorandum from the General Manager, Gaming Policy and Enforcement Branch (GPEB) dated September 3, 2019, which in turn replaced and superseded all previous related direction and correspondence in relation to reporting requirements for BCLC and Gaming Service Providers.

GPEB is responsible for the overall integrity of gaming and horse racing in British Columbia, as outlined in Section 23 of the *Gaming Control Act* (GCA).

Section 86(2) of the GCA requires the lottery corporation, a registrant, and a licensee to notify the General Manager, GPEB, immediately about any conduct, activity or incident occurring in connection with a lottery scheme or horse racing, if the conduct, activity or incident occurring in connection with a lottery scheme or horse racing involves or involved the commission of an offence under the *Criminal Code* of Canada that is relevant to a lottery scheme or horse racing or the commission of an offence under the GCA.

Additionally, Section 34(1)(t) of the *Gaming Control Regulation* (GCR) requires a gaming service provider, unless they are a lottery retailer, to immediately report to the General Manager, GPEB, any conduct or activity at or near a gaming facility that is or may be contrary to the *Criminal Code* of Canada, the GCA, or the GCR.

When reporting to/notifying the General Manager, GPEB, the expectation is that BCLC and/or gaming service providers will provide comprehensive details in the first instance to ensure meaningful notification to meet reporting obligations. This will ensure that GPEB can immediately assess the notification and determine if the matter requires regulator intervention.

It is the collective responsibility of GPEB, BCLC and all Gaming Service Providers to protect personal information. Information received from Gaming Service Providers is communicated to GPEB securely, and GPEB takes its responsibilities around the collection, use, and disclosure of personal information seriously. Gaming services providers are reminded not to distribute the reported matter without the approval of GPEB.

For the notification requirements under Section 86(2), reporting requirements under Section 34(1)(t) and any directive from the General Manager regarding reporting requirements, see attached Appendix 'A'.

BCLC and Gaming Service Providers who are:

- Class A, B, or C casino service providers;
- Class A and B bingo service providers; or
- Community Gaming Centre service providers

will use the secure Section 86(2) online portal: <https://www.gaming.gov.bc.ca/section86/report.x>

Guidance documentation for Section 86(2) online submission has been provided. The most recent version is available on the Section 86(2) online portal and should be used as a reference guide for reporting. The guidance will be updated as required, and BCLC and Gaming Service Providers must ensure they are referring to the most recent version of the guidance when reporting.

Gaming Service Providers who do not possess a class of registration specified above must report to the General Manager either through their existing Section 86(2) reporting process, or alternatively contact their regional GPEB office to identify and implement an appropriate reporting mechanism.

The legal obligation to report conduct, activities, or incidents in accordance with Section 86(2) and Section 34(1)(t) to the General Manager does not alleviate gaming service providers of any contractual requirements to report matters to the BC Lottery Corporation.

Please ensure this updated document is distributed to the appropriate staff in your organization. Your cooperation is much appreciated.

Yours sincerely,



Sam MacLeod  
General Manager and Assistant Deputy Minister

## Appendix A

### Section 86(2) and Section 34(1) (t) Reporting Requirements

The reporting/notification requirements under section 86(2) of the GCA, section 34(1)(t) of the GCR, and directives issued by the General Manager regarding reporting requirements includes, but is not limited to, the following conduct, activities, or incidents:

- a) Cheating at play; including:
  - i) collusion between players, or dealers;
- b) Thefts; including:
  - i) theft affecting the integrity of the game;
  - ii) theft from the house or a lottery retailer site;
  - iii) theft by a registered gaming worker;
  - iv) theft from patrons including, but not restricted to, theft of Internal Voucher System tickets;
  - v) theft committed against charitable gaming;
- c) Money Laundering; which may be indicated by:
  - i) unusual financial transactions;
  - ii) suspicious large cash transaction and/or suspicious patron gaming fund account activity;
  - iii) suspicious electronic funds transfer;
  - iv) suspicious financial transactions;
  - v) unsourced funds including third party bank drafts;
- d) Loan sharking; which may be indicated by:
  - i) chip exchange;
  - ii) cash exchange;
  - iii) unsourced chips;
- e) Robbery involving a gaming facility or a patron leaving the gaming facility;
- f) Threats or harassment by, or against, a Registered Gaming Worker;
- g) Assault by, or of, a Registered Gaming Worker, including sexual assault;
- h) Conducting unauthorized lottery schemes;
- i) Counterfeit gaming chips, currency and lottery tickets;
- j) Minors found in or participating in gaming activities in a gaming facility;
- k) Minors playing PlayNow.com;
- l) Persons entering gaming facilities in breach of their legal prohibition under Section 92(1) GCA
- m) Unregistered Gaming Service Providers;
- n) Fraud involving lottery tickets, casino chips, lottery schemes or online gaming through the PlayNow platform;
- o) Personation or false identification where the incident involves an attempt to claim prizes or payouts;
- p) Weapons possession, or carrying a concealed weapon;
- q) Extortion