



October 8, 2021

Reply to: *Jitesh Mistry, General Counsel*
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VIA Email

Commission of Inquiry into Money Laundering in British Columbia
PO Box 10073
601 -700 West Georgia Street
Vancouver, BC V7Y 1B6

Dear Commission Counsel:

Re: BCGEU Response Submission – Commission of Inquiry into Money Laundering in British Columbia

The BCGEU sets out below its submission in response to the initial submissions filed by the other gaming industry participants.

As we have emphasized over the course of the Commission, there has been a paucity of evidence before the Commission regarding the experience of, and challenges facing, frontline workers. Our perspective on this issue is well covered in our initial submissions and we will not repeat it here. That said, we do note that our recommendations for protecting workers would appear to be even more relevant in light of the scarce mention of rank-and-file workers by their employers and their government.

Given the scant mention of the interests of everyday working people in the other parties' submissions, as well as our commitment to stay within our area of knowledge and expertise, we will be brief in response.

We agree with and adopt the Province of British Columbia's submissions urging the Commission to take a contextual and generous approach to examining the conduct of workers at GPEB (and, indeed, the public service).¹

Similarly, we agree with the submissions of the Great Canadian Gaming Corporation, that frontline workers are hardworking and committed to addressing money laundering and

¹ Closing Submissions of her Majesty the Queen in Right of the Province of British Columbia on the Gaming Sector (2021-09-28) at 1, para. 3.

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We are located on the unceded and shared traditional territory of the xʷməθkʷəy̓əm (Musqueam), Skwxú7mesh (Squamish) & Səlil̓ Iwətaʔ (Tsleil-Waututh) peoples.

they should not be held to a standard of perfection in adhering to AML reporting requirements.²

We commend Gateway Casinos for their emphasis on avoiding unconscious bias against East Asians.³

Beyond these brief comments, the BCGEU is content to rely upon its initial submissions and any further oral submissions we may make.

All of which is respectfully submitted



Jitesh Mistry
General Counsel

JM/

² Closing Submissions of the Great Canadian Gaming Corporation and its subsidiaries (2021-09-28) at 1, 8 and 9, paras. 3 and 28.

³ Closing Submissions of the Participant Gateway Casinos & Entertainment Limited (2021-09-24) at 3-5, paras. 8-14.