



**CIFA-BC**  
ANNUAL REPORT  
2021/22



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# FOREWORD

On behalf of the Strategic Advisory Board, welcome to the 2021/22 CIFA-BC Annual Report. This document highlights significant achievements over the past year.

Information sharing and siloed approaches have been longstanding challenges to effectively addressing money laundering and financial crime in British Columbia, across Canada, and abroad. The COVID-19 pandemic and other events of the past year have posed an additional set of unprecedented challenges that have further shifted the financial crime landscape. We collectively look forward to the pending report by the Cullen Commission of Inquiry into Money Laundering in British Columbia to recommend measures that will improve and strengthen our AML system to better prevent, detect, and disrupt money laundering. Elements of an effective regime include many facets such as a sound legal foundation, functioning and adequately-resourced supervisory and enforcement mechanisms, information sharing, and strong intergovernmental and interagency coordination. Never before has the need for extensive collaboration and robust partnerships been as critical to keep pace with an evolving and increasingly complex environment; it is indeed the only way forward to facilitate joint action by the many stakeholders that are affected by the issues of today.

In accordance with international standards, CIFA-BC has pioneered a nascent model in Canada to lawfully share information across federal and provincial jurisdictions, with regulatory bodies, financial institutions, law enforcement, professional associations, and academia. As a financial information sharing partnership focused on countering illicit finance to improve the financial integrity of British Columbia, CIFA-BC is uniquely positioned to coalesce the expertise and resources of multiple entities to better understand and identify modalities of money laundering at the macro and transactional levels.

CIFA-BC is fundamentally an initiative that is propelled by, and for the direct benefit of, its partners. Measures of progress will first depend on the value that is created for our partners, with further consideration given to the ancillary benefits that reach beyond the immediate partnership to external stakeholders and the wider public. As we continue to remain focused on expanding the knowledge and awareness of our partners, the activities and experiences of the past year have increasingly confirmed the value CIFA-BC brings to its membership and external stakeholders.

The accomplishments of the past year are a testament to the productive relationships that have formed and to the shared purpose that has taken shape across our partner organizations to improve British Columbia's financial ecosystem. We specifically acknowledge and thank Sergeant Ben Robinson and Corporal Grace Wood for their dedication, skill, and hard work during their respective tenures in the Director of Operations role at CIFA-BC. We also thank our partner organizations and the many individuals who have contributed their time, energy, and expertise to the activities of CIFA-BC and we view the achievements during the past year as a strong foundation for a productive and successful year ahead.

**William Ng,**  
**Assistant Commissioner**  
CRIMINAL OPERATIONS  
OFFICER, FEDERAL,  
INVESTIGATIVE SERVICES  
AND ORGANIZED CRIME OF  
THE "E" DIVISION (BRITISH  
COLUMBIA) RCMP

**Glen Lewis,**  
**Associate Director of  
Police Services**  
MINISTRY OF PUBLIC SAFETY  
AND SOLICITOR GENERAL OF  
BRITISH COLUMBIA

# EXECUTIVE DIRECTOR'S ACKNOWLEDGEMENTS

It makes me immensely proud to see CIFA-BC come to fruition and to observe its numerous successes detailed in this Annual Report. The growth, structure, and value of the Alliance have far exceeded the concept that Sergeant Ben Robinson and I conceived when we decided to tackle Project Athena's evolution to a formal Financial Information Sharing Partnership. This is a testament to the power of partnerships and to the dedicated individuals who provided tremendous support to make CIFA-BC a reality.

I wish to acknowledge that CIFA-BC could not have become a reality without early support from Senior Leadership within the Provincial Government, the Federal Government, and the BC RCMP. I extend special gratitude to the BC RCMP Commanding Officer, Deputy Commissioner Dwayne McDonald; to the Honourable Ministers Mike Farnsworth, David Eby, and Carole James for jointly pledging to support CIFA-BC in its infancy; and, to the Honourable Bill Blair who was the first to fund the Alliance through his Department.

CIFA-BC also could not have gotten off the ground without the support of Ms. Megan Harris, the original BC Anti-Money Laundering Secretariat; Superintendent Stephen Cocks, Combined Forces Special Enforcement Unit of British Columbia; Assistant Commissioner Kevin Hackett, former Federal Criminal Operations Officer; and, Superintendent Peter Payne, Director of Financial Crimes, RCMP National Headquarters. We were fortunate for their trust in us, in British Columbia, to build and pilot Canada's first formalized Financial Information Sharing Partnership.

As this is our inaugural Annual Report, I would like to take the opportunity to acknowledge the work of some individuals who did some heavy lifting to help shape what would become CIFA-BC before it even had its name. This list includes Ms. Azadeh Bell-Irving, Ms. Paige Morris, Dr. Tony Masys, Ms. Megan Nettleton, Ms. Angela Rai, Sergeant Raj Mitra, Corporal Vinh Ngo, and Corporal Simon Cripps. The initial work of this group of individuals was the architecture for the framework of CIFA-BC.

I would like to acknowledge two changes to the Strategic Advisory Board, and thank Deputy Commissioner Dwayne MacDonald, past Co-Chair; and Mr. Jeff Groot, past Board Member. Your service on the inaugural Board provided a strong foundational starting point.

I would also like to welcome new Board members, Assistant Commissioner Will Ng, Co-Chair; and Ms. Michele Jaggi-Smith, Board Member to their positions. I further welcome Corporal Mathew Condon, Director of Operations; Corporal Dustin Young, Manager of Operations; and Dr. Catherine Shaffer-McCuish, Strategic Research Analyst to their new roles. Your collective experiences and impressive contributions to public service will continue to help CIFA-BC raise the bar.

I wish our former Manager and Director of Operations, Corporal Grace Wood well in her new endeavours. Without her professionalism and dedicated service, CIFA-BC would not be the strong impactful partnership we know today.

Lastly, I would be remiss if I did not acknowledge and thank Sergeant Ben Robinson, who is the principal reason we have the Alliance. Sergeant Robinson's role was fundamental to establishing Project Athena, coining the name CIFA-BC, and most importantly, in taking a vision and making it a reality through effective leadership, perseverance, and by building the strong and enduring relationships that CIFA-BC is predicated upon.



**Gregory Leong, Supt**  
EXECUTIVE DIRECTOR



# DIRECTOR'S MESSAGE

The 2021-22 period marks an important milestone as the first year of operations for CIFA-BC. At the outset, we committed to furthering our understanding of Financial Information Sharing Partnerships to lay the foundation for an initiative that was value-based, objective-led, and partner-driven. With this view, the team at the CIFA-BC Coordination Office initiated consultations with stakeholders and laid out plans for a partnership design. We took into account stakeholder feedback and gained inspiration from established and highly regarded international public-private financial information sharing models. During the design and development phase, the pandemic began to take hold, bringing with it widespread uncertainty and causing unprecedented disruptions to past ways of living and working. Like many others, we adapted to new realities by adjusting work arrangements and remaining responsive to evolving public health conditions.

Throughout the ups and downs of the past two years, we continued to solidify existing relationships and forge new connections. We dedicated significant efforts to collaborate and share information between partners and externally with stakeholders. We have endeavoured to promote communication and deeper understanding in all directions. These efforts have resulted in better exchanges of information and promoted greater awareness and understanding of pertinent issues by partners. Our successes in promoting robust collaboration and information sharing across relevant stakeholders are all steps towards supporting British Columbia's Anti-Money Laundering Strategy and improving the Province's financial outlook.

Looking back over the past year, I am pleased with our collective results and achievements. We adopted a Partner Protocol to guide cooperation and participation amongst partners. We determined organizational priorities and developed a strategic plan to guide our activities. We ensured oversight by implementing a Strategic Advisory Board. We developed three typology reports which have been shared across government and industry, reaching audiences as far away as Europe. We held two symposia with presenters from North America and Europe covering a range of important anti-money laundering topics, reaching over 300 attendees. We organized eight training workshops, improving knowledge and awareness on subjects including cryptocurrencies, trade-based money laundering, environmental crime and money laundering, information sharing, and numerous others. We held several working group meetings to discuss existing and emerging financial crime issues, trends, and risks between partners. We opened the door to establishing new connections and relationships between partners by facilitating introductions and referrals.

The successes of the past year would not have been realized without the dedicated efforts of our partners. The skill, knowledge, and invaluable contributions of our partners deserve special mention and recognition as the driving force behind CIFA-BC's achievements. The commitment of our partners to come together and combat money laundering is an important step to protecting the integrity of British Columbia's financial system. Our partners are our greatest resource, and without them, many of the operational outcomes in this report would not have been possible.

I wish to recognize and thank the team at the CIFA-BC Coordination Office for their fastidious efforts and diligence in supporting the day-to-day operations of the Alliance. Throughout CIFA-BC's design and development through to implementation, the staff at the Coordination Office have remained focused on, and attentive to, producing timely and high-quality work; the results are indeed commendable. I have been fortunate to work with such a committed and engaged group of colleagues.

Finally, I would like to express my appreciation to the Strategic Advisory Board members for their time, support, and contributions to CIFA-BC. The Board serves an important function for this initiative and their leadership is essential to the success and longevity of the Alliance.

The coming months will mark a time of growth for CIFA-BC and I look forward to a busy and productive year ahead. We will utilize the coming period to develop a new multi-year strategic plan and to make operational adjustments where necessary, in order to enhance our operations and remain responsive. Most importantly, we will continue working to deepen trust and relationships with partners with a focus on delivering better money laundering outcomes for British Columbia.



**Grace Wood, Cpl**  
DIRECTOR OF OPERATIONS



# HIGHLIGHTS

## OUR YEAR IN NUMBERS

### STRATEGIC INTELLIGENCE PRODUCTS

3

intelligence products developed and disseminated to partners, law enforcement, & external stakeholders

65%

of intelligence products shared onwards by partners

### COLLABORATION

19 connections facilitated across partners, AML stakeholders, & law enforcement

Shared portal accessed by **45 PARTNERS**

### KNOWLEDGE DEVELOPMENT



14 financial crime presentations delivered to partners & stakeholders



842 attendees across training events and presentations



94% of survey respondents indicated satisfaction with the range of speakers and presenters for training events



21+ hours of training content offered



80% of survey respondents indicated satisfaction with the relevance of training content to their daily work

### SYMPOSIA

#### MAY 2021 SEMI-ANNUAL SYMPOSIUM

- Attended by 131 individuals
- 92% of respondents indicated satisfaction with the event



#### NOVEMBER 2021 SYMPOSIUM

- Attended by 150 individuals
- Featured five speakers with over 5 ½ hours of content



2 investigative leads referred to law enforcement

# ABOUT CIFA-BC

## WHO WE ARE

The Counter Illicit Finance Alliance of British Columbia (CIFA-BC or Alliance) is an RCMP-led Financial Information Sharing Partnership (FISP) composed of 36 multi-sectoral public and private organizations unified to combat money laundering and financial crime. Our mission is to lawfully exchange information to protect the integrity of British Columbia (BC) through the prevention, detection, and disruption of illicit financial activity. We believe that by optimizing the capacity of public and private industry, we will achieve a safer, more prosperous, and resilient economy.

Over the 2021-22 reporting year, we identified specific financial crime priorities relevant to the BC landscape and concentrated our efforts towards building strategic knowledge and analysis of these issues. CIFA-BC offers the forum for a diverse membership of entities to convene and progress collectively identified priorities and work towards intended outcomes. Without first improving the knowledge of threats and risks to organizations and systems alike, there cannot be effective progress made to reduce the harms caused by money laundering and financial crime.

## OUR VALUES

### BUILD

Building relationships, connections, and mutual trust

### RESPECT

Respecting the diverse strength and contributions of partners

### COLLABORATE

Collaborating with shared purpose to deliver results

### LEAD

Leading with transparency and accountability

## OUR STRUCTURE

The CIFA-BC secretariat, known as the CIFA-BC Coordination Office (CCO), is led by a Director and a Manager of Operations who are supported by a small team of staff. The secretariat, which is based at the RCMP Provincial Headquarters in BC is linked to the Counter Illicit Finance National (CIF National) initiative which is based at RCMP National Headquarters in Ottawa. CIF National serves as the conduit connecting CIFA-BC and other potential CIFA initiatives or Public-Private Partnerships to federal anti-money laundering (AML) regime stakeholders.

CIFA-BC is vertically accountable to a Strategic Advisory Board (SAB), which provides oversight and leadership to the Alliance, and is detailed later in this report. As a partner informed and driven initiative, the Alliance also maintains lateral accountability to its partner base of public entities and private organizations.

## WHAT WE BELIEVE

Through the sharing of information, the work of partnerships like CIFA-BC pave the way for more robust linkages between public bodies, private institutions, law enforcement, and the intelligence community to address financial crime across the criminal justice value chain. Results in addressing money laundering cannot be achieved in isolation. Just as money laundering and financial crime permeate borders and jurisdictions, solutions to these issues must intersect industries, sectors, and levels of government. Progress will most effectively be realized through a financial crime ecosystem rooted in networks of organizations exchanging knowledge and sharing expertise while working towards a common purpose. This is how we will transcend narrow viewpoints to see all the pieces of the puzzle.

We are committed to uplifting the capability of our partners and extending our reach to build resilience across a wider continuum of organizations and AML stakeholders. Our efforts to support a system-level approach to target money laundering and economic crime are embedded in these principles and are what will enable each of us to proactively identify, prevent, and disrupt illicit financial activity to help protect the public sector, businesses, and communities in BC and across Canada.

## BENEFITS OF PUBLIC-PRIVATE FINANCIAL INFORMATION SHARING PARTNERSHIPS

- The development of more collaborative and constructive relationships between relevant public agencies and regulated entities
- Heightened risk awareness in the private sector, including through the development of alerts and typologies
- Increased understanding in the public sector about complex financial issues or services and their vulnerabilities to abuse
- An increase in the number of suspicious transaction reports addressing threats prioritized by the partnership
- More timely and relevant reporting in response to active investigations or live incidents
- Improved quality and use of suspicious transaction reporting

Source: Maxwell, N.J. (2019). *Expanding the Capability of Financial Information-Sharing Partnerships*. Royal United Services Institute. Occasional Paper, 10-11.

# PERFORMANCE REPORT

CIFA-BC's Strategic Plan for 2021-22 set forth three performance goals and nine corresponding performance objectives. Operations over the past year have been shaped by these goals and objectives, and CIFA-BC's performance is measured against these strategic priorities. These measurements indicate value to our partners and impact across our areas of focus.

In pursuing these goals, we followed the principles of transparency and accountability by continually reporting progress to the SAB and partners through briefing notes, meeting updates, and via the CIFA-BC Bulletin.

The work summarized in this performance report is not an exhaustive or granular recounting of every step taken to further a given objective. Rather, it is intended to provide the reader with a succinct overview of notable tasks, milestones, or achievements towards stated objectives.

## 2021 TIMELINE

### APRIL 2021

Framework  
Partner Protocol  
SAB Implementation



### MAY 2021

Strategic Plan  
Semi-Annual Symposium



### JUNE 2021

Underground Banking  
Typology Report



### JULY 2021

Money Mule Typology Report



### NOVEMBER 2021

Annual Symposium



### DECEMBER 2021

Partner Handbook  
GC Collab launch

In 2021-22, CIFA-BC reached the following milestones in regard to the following goals:

GOALS AND OBJECTIVES	PROGRESS
<b>IMPLEMENT CIFA-BC INFRASTRUCTURE</b>	
1.1 – Establish governance and accountability structure	✓
1.2 – Develop performance measurement framework	✓
<b>ADDRESS GAPS IN AML SYSTEM</b>	
2.1 – Facilitate regional threat prioritization	🕒
2.2 – Enable feedback on intelligence reporting	🕒
2.3 – Align public-private partnership priorities to maximize impact of partnerships	✓
<b>ENHANCE PARTNER AWARENESS AND UNDERSTANDINGS</b>	
3.1 – Identify and respond to financial crime risks	🕒
3.2 – Enable targeted learning opportunities	✓
3.3 – Enhance collaborative capacities	✓
3.4 – Explore personal information sharing opportunities	🕒

LEGEND		
<p>Not Achieved ✘</p> <p><b>Not achieved</b> means we did not demonstrate achievement against the objective within the current reporting cycle.</p>	<p>Partially Achieved 🕒</p> <p><b>Partially achieved</b> means we demonstrated some achievement towards the objective within the current reporting cycle; progress is ongoing.</p>	<p>Achieved ✓</p> <p><b>Achieved</b> means we successfully demonstrated achievement against the objective within the current reporting cycle.</p>

# STRATEGIC GOAL 1

## IMPLEMENT CIFA-BC INFRASTRUCTURE

### Objective 1.1 - Establish Governance and Accountability Structure

#### PERFORMANCE SUMMARY

Effective leadership and oversight is an essential mechanism of a well-functioning initiative. Early in its operational phase, CIFA-BC worked to implement governance through a formalized SAB. In Spring 2021, invitations for Board membership were sent to, and accepted by, seven individuals.

The SAB was implemented to provide executive oversight and leadership to CIFA-BC on its strategic objectives and operational priorities. CIFA-BC is directly accountable to its Board for its performance. In developing the Board, CIFA-BC consulted with the Ministry of Public Safety and Solicitor General of British Columbia - Police Services Branch (PSB) on the structure and composition of the Board. PSB holds a co-chair role at the SAB in conjunction with BC-RCMP Senior Leadership. Terms of Reference for the SAB were developed and included in the Partner Protocol prior to Board formation. Subsequently, CIFA-BC developed a Governance Policy for the Board which delineated in greater detail the responsibilities, functions, and operating procedures of the SAB.

Between 2021-22, CIFA-BC regularly updated, consulted with, and obtained guidance and approval from the SAB on a number of operational functions, such as performance measurement and strategic planning. The CCO has established a tri-annual regular reporting frequency to the Board and ongoing reporting to partners to ensure CIFA-BC remains action and results-oriented across strategic cycles. CIFA-BC is committed to maintaining regular reporting to ensure a sound accountability structure.

### Objective 1.2 - Develop Performance Measurement Framework

#### PERFORMANCE SUMMARY

Performance measurement serves as a tool for evaluation and is a cornerstone of organizational accountability. It communicates expectations, identifies operational strengths and weaknesses, and supports the planning process.

Prior to, and during the process of developing performance measures, the CCO consulted with other FISPs to understand benchmarks for similar initiatives at the international level. In 2021, CIFA-BC began working with the PSB to bilaterally develop performance measures. The CCO also identified performance indicators and developed internal processes to facilitate the collection and documentation of outputs. A final draft of the performance measures was presented to, and endorsed by, the SAB on September 15, 2021.

To support assessments on past operations using direct feedback from partners, the CCO developed and disseminated a year-end survey to collect information on operations, partnership design, and the impact of participation in CIFA-BC on partners. The information obtained from this consultation will be used to support planning and to inform adjustments to operations.

# STRATEGIC GOAL 2

## ADDRESS GAPS IN AML SYSTEM

### Objective 2.1 – Facilitate Regional Threat Prioritization

#### PERFORMANCE SUMMARY

Early CCO-led consultations with government and intelligence stakeholders determined that a framework to prioritize regional money laundering threats/risks would align with the BC AML Strategy and would strengthen British Columbia's AML regime.

Together with the Criminal Intelligence Services of British Columbia/Yukon Territory (CISBC/YT), the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), the Department of Finance Canada, the BC Anti-Money Laundering Secretariat, and the Gaming Policy and Enforcement Branch (GPEB), a Steering Committee was formed in November 2021 to spearhead work on developing a regional money laundering prioritization model for BC. A proposal informed by multiple stakeholders was drafted, outlining the model's objectives, potential uses, timelines, and methods of construction. Additional work was carried out to refine elements of the proposal, thereby resulting in a more robust model that closely aligned with existing AML strategies such as the National Inherent Risk Assessment (NIRA) and the Canadian Integrated Response to Organized Crime (CIROC) Money Laundering Strategy.

Next steps include finalizing scoring criteria and completion of the first set of ratings, which are anticipated at the end of the 2022 calendar year. The first report is expected to be completed and released in early 2023.

### Objective 2.2 – Enable Feedback on Intelligence Reporting

#### PERFORMANCE SUMMARY

Law enforcement, specifically the RCMP, represent the largest recipient of intelligence disclosures from FINTRAC. To determine how disclosures are actioned once received by the RCMP and areas where adjustments can be made to improve overall efficacy, the CCO conducted a review and analysis of disclosure packages received by the BC RCMP between January 1, 2019 and June 29, 2021.

For this review, all disclosure packages received during the above period were coded and categorized to determine the workflow of proactive and Voluntary Information Record (VIR) disclosures, timelines, and how the information provided by FINTRAC is being used. In addition, the CCO consulted with the RCMP "E" Division Operational Support Group Intake Unit, the RCMP National Intake Unit, the Federal, Serious, and Organized Crime - Financial Integrity Unit and the Combined Forces Special Enforcement Unit of British Columbia - Joint Illegal Gaming Investigative Team to better understand the disclosure process and challenges.

Findings of the analyses and consultations revealed challenges related to dissemination and workflow, tools, resourcing, the nature of FINTRAC disclosures, and the provision of feedback to FINTRAC. Steps are currently underway to determine the causes of, and implement solutions to, address these issues.



## Objective 2.3 – Align Public-Private Partnership Priorities to Maximize Impact of Partnerships

### PERFORMANCE SUMMARY

Efforts were made to strategically coordinate and collaborate with various national and international stakeholders, initiatives, and partnerships to share and obtain best practices, inform work on money laundering risks and threats, and support systems-level progress. These included:

**Contributed** to the work of the Public Private Collaboration Steering Committee's threat identification for escalation through the Collaborative Threat Assessment.

**Collaborated** with British Columbia's Anti-Money Laundering Secretariat to align mutual objectives and strengthen BC's AML strategy.

**Worked** with the Department of Public Safety Canada's Online Illicit Cannabis Sales outreach initiative to share best practices and for engagement in the CIFA-BC Illicit Cannabis subgroup.

**Coordinated** with Europol's Financial Intelligence Public Private Partnership (EFIPPP) to exchange knowledge products and best practices and facilitate CIFA-BC's membership at EFIPPP.

**Collaborated** with FINTRAC on advancement of CIFA-BC's Underground Banking typology into FINTRAC's first Sectoral and Geographic Advisory to promote greater awareness of the money laundering/terrorist financing risks associated with underground banking.



# STRATEGIC GOAL 3

## ENHANCE PARTNER AWARENESS AND UNDERSTANDINGS

### Objective 3.1 – Identify and Respond to Financial Crime Risks

#### PERFORMANCE SUMMARY

The identification of, and response to, financial crime risks embodies the core operations of CIFA-BC. In 2021, CIFA-BC identified seven financial crime priorities of relevance to the BC landscape, which by comparative measures, was ambitious for a newly formed FISP.

Subgroups comprised of CIFA-BC partners were formed for six of the seven identified financial crime priorities. Each subgroup held meetings and coordinated case studies and presentations to discuss, review, research, analyze, and better understand the identified risk.

The result of each subgroup's work culminates in a knowledge product which was often, but not always, a typology report. Typology reports provide thematic analysis of money laundering methods, with a view to raising awareness of mechanisms, enablers, and risk indicators of the given theme. The objective of typology products is to support designated users of the information to effectively identify suspicious transactions, behaviours, or relationships and to subsequently take measures to mitigate or address such risks. To date, CIFA-BC subgroups have developed three knowledge products, with two additional reports underway.

### Objective 3.2 – Enable Targeted Learning Opportunities

#### PERFORMANCE SUMMARY

Enhancing partner and stakeholder understandings of existing and emerging risks has been, and will continue to be, a fundamentally important objective of CIFA-BC. It is predicated on the principle that supporting deepened partner knowledge of threats and risks will uplift capabilities and better equip partners and stakeholders, many of whom are the first line of defence, to prevent, detect, and disrupt financial crime.

In line with this ethos, the CCO planned and delivered two symposia and seven presentations and trainings by 22 presenters with subject matter expertise in financial crime. Some learning opportunities were delivered specifically to CIFA-BC partners, while others, such as the symposia, were open to stakeholders beyond the partnership. During the reporting period, CIFA-BC presentations included over 20 hours of content and were attended by over 800 individuals.

End-of-year feedback from our partners revealed that the quantity and quality of the learning opportunities, including the relevance of the content to their work, was highly regarded. This was further substantiated by recurrent positive feedback and reviews received by the CCO from partners after presentations and training workshops. These forums allowed space for interactive and rich dialogue between partners to germinate and flourish, enabling deeper collective insights into crime trends and developing indicators of criminal behaviour. Ongoing training opportunities will enrich the work of the private and the public sector by enabling them to better identify and take measures to mitigate threats and risks.

## Objective 3.3 – Enhance Collaborative Capacities

### PERFORMANCE SUMMARY

True collaboration is grounded in a solid foundation of mutual trust and sense of connection. It is driven by relationships and a common purpose. To develop this foundation, guiding principles and parameters for cooperation were embedded in CIFA-BC's Partner Protocol and Information Sharing Agreement. Objectives and intended impacts were reflected in the CIFA-BC Framework and 2021-22 Strategic Plan.

To facilitate cooperation and collaboration across partners, a Partner Handbook was developed and distributed which included contact information and other organization-specific details. Additionally, in 2021, the GC Collab platform was launched enabling centralized access to resources, updates, a calendar of events, and materials for partners. Furthermore, the CCO directly facilitated numerous introductions and connections between and across partners, law enforcement, and external stakeholders.

## Objective 3.4 – Explore Personal Information Sharing Opportunities

### PERFORMANCE SUMMARY

Information sharing between public and private bodies is commonly practiced by international FISPs and recognized as key to a well functioning and robust AML regime. In Canada, the public-private information sharing framework is a multi-jurisdictional issue governed by a complex mosaic of legal provisions. As the conduit for CIFA-BC and any future CIFA initiatives, CIF National (via RCMP Federal Policing Criminal Operations Financial Crime [FPCO-FC]) has, and will continue to, support the streamlined exploration of information sharing opportunities at the national level.

In an effort to lawfully share information in the interest of protecting the economic integrity of Canada, FPCO-FC established the Money Laundering Contact Group (MLCG), which includes participation from all of Canada's major Financial Institutions. More recently, the RCMP was provided with temporary enhanced information sharing powers, made available by invoking the Emergency Act. This allowed the RCMP to share information with listed entities in Section 3 of the Emergency Economic Measures Order (EEMO). As a result, a direct channel of communication between law enforcement and financial institutions was established to allow for better-coordinated information sharing. The information sharing that occurred under the implementation of the EEMO demonstrated the power of information sharing in identifying and disrupting illegal activity. It also highlighted the importance of adhering to applicable laws and procedures when engaged in the sharing of personal information between law enforcement and the private sector.

To establish a new information gateway between law enforcement and the private sector, FPCO-FC engaged the RCMP Legal Services Unit to review a template that could be used to share information while respecting privacy obligations. Once approved, it will be provided to private sector partners for their consultation.

# FINANCIAL CRIME SUBGROUPS

The following subgroups correspond to the financial crime priorities identified in CIFA-BC's 2021-22 Strategic Plan. This section provides a synopsis of each subgroup, including composition, progress, and results to date. In addition to their substantive responsibilities and duties at their home organizations, partner representatives frequently participated in multiple subgroups, while also engaging in CIFA-BC meetings and trainings. Given this, subgroup activities and timelines were staggered to support the management of contemporaneous responsibilities and workloads.

While some of the subgroups concluded their work in time for the release of this report, other subgroup activity is currently ongoing and results of that work will be captured in future reporting. During the reporting period, CIFA-BC subgroups reached the following milestones.

## UNDERGROUND BANKING

Alternative mechanisms that facilitate the unlawful remittance of money or value between jurisdictions

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYPOLGY DEVELOPMENT MEETINGS			✓
KNOWLEDGE PRODUCT			✓

### *SUBGROUP LEAD(S)*

CIFA-BC Coordination Office

### *SUBGROUP PARTICIPANTS*

Bank of Montreal, British Columbia Lottery Corporation, Canada Border Services Agency, Combined Forces Special Enforcement Unit of British Columbia, Federal and Serious Organized Crime - Financial Integrity, Financial Transactions and Reports Analysis Centre of Canada, Gaming Policy and Enforcement Branch, HSBC Bank Canada, International Centre for Criminal Law Reform, The Toronto-Dominion Bank

## MONEY MULES

Individuals who, wittingly or unwittingly, transfer value or transport proceeds of crime on behalf of a criminal organization or money launderer

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYOLOGY DEVELOPMENT MEETINGS			✓
KNOWLEDGE PRODUCT			✓

### *SUBGROUP LEAD(S)*

Financial Transactions and Reports Analysis Centre of Canada

### *SUBGROUP PARTICIPANTS*

Bank of Montreal, British Columbia Financial Services Authority, British Columbia Lottery Corporation, Canada Border Services Agency, Gaming Policy and Enforcement Branch, HSBC Bank Canada, The Toronto-Dominion Bank

## MONEY SERVICE BUSINESSES

Non-bank entities that offer services to the public including foreign exchange, money transfers, issuing/redeeming money orders, traveller's cheques (or other similar negotiable instruments), and dealings in virtual currencies

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYOLOGY DEVELOPMENT MEETINGS			✓
KNOWLEDGE PRODUCT			✓

### *SUBGROUP LEAD(S)*

British Columbia Financial Services Authority, Canada Revenue Agency

### *SUBGROUP PARTICIPANTS*

Bank of Montreal, British Columbia Securities Commission, Canadian Imperial Bank of Commerce, Federal and Serious Organized Crime - Financial Integrity, Federal Policing National Intelligence, Financial Transactions and Reports Analysis Centre of Canada, International Centre for Criminal Law Reform, Ministry of Finance, The Bank of Nova Scotia, The Toronto-Dominion Bank, Vancouver City Savings Credit Union

## MISUSE OF PROFESSIONAL SERVICES

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYOLOGY DEVELOPMENT MEETINGS	✓		
KNOWLEDGE PRODUCT	✓		

### *SUBGROUP LEAD(S)*

Chartered Professional Accountants of British Columbia, Law Society of British Columbia, Royal Bank of Canada, Society of Notaries Public of British Columbia

### *SUBGROUP PARTICIPANTS*

British Columbia Lottery Corporation, British Columbia Securities Commission, Financial Transactions and Reports Analysis Centre of Canada, International Centre for Criminal Law Reform

## ONLINE ILLICIT CANNABIS RETAILERS

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYOLOGY DEVELOPMENT MEETINGS			✓
KNOWLEDGE PRODUCT		✓	

### *SUBGROUP LEAD(S)*

Federal and Serious Organized Crime - Financial Integrity, The Bank of Nova Scotia

### *SUBGROUP PARTICIPANTS*

Canada Revenue Agency, Canadian Imperial Bank of Commerce, Federal Policing National Intelligence, Financial Transactions and Reports Analysis Centre of Canada, HSBC Bank Canada, Public Safety - Cannabis Policy Unit, Royal Bank of Canada, The Toronto-Dominion Bank, Vancouver City Savings Credit Union

## ONLINE GAMING

	NOT INITIATED	UNDERWAY	COMPLETED
SUBGROUP FORMATION			✓
TYOLOGY DEVELOPMENT MEETINGS			✓
KNOWLEDGE PRODUCT		✓	

### *SUBGROUP LEAD(S)*

British Columbia Lottery Corporation,  
Gaming Policy and Enforcement Branch

### *SUBGROUP PARTICIPANTS*


Bank of Montreal, Combined Forces Special Enforcement Unit of British Columbia, Financial Transactions and Reports Analysis Centre of Canada, The Toronto-Dominion Bank

## PRIVATE LENDER ACTIVITIES

While the misuse of private lending remains a relevant component of AML strategies at the regional and national levels, competing interests and workloads within CIFA-BC resulted in a decision taken by the CCO to discontinue this subgroup for the duration of the current strategic cycle.


# LEVERAGING COLLABORATION

## WHAT OUR PARTNERS THINK



CIFA-BC is a unique partnership of a cross-section of financial and other entities, dedicated to preventing money laundering and financial crimes generally. By sharing a common table, the various CIFA-BC members, regardless of category, have the ability to exchange ideas and best practices, as well as learn from experts in relevant fields. Without a doubt, this initiative has improved our knowledge base, but more importantly, has brought organizations together who in the past were either operating solo, or through informal networks. We appreciate the commitment of the organizers.

INTERNATIONAL CENTRE OF  
CRIMINAL LAW REFORM



As the gambling regulator in BC, the Gaming Policy and Enforcement Branch continues to develop our AML responsibilities. Our engagement within CIFA-BC has proven critical in ensuring we have a clear understanding of the current money laundering typologies and the threat landscape. This collaboration has also opened doors to partnerships that have proven beneficial in our efforts to strengthen the gambling sector against money laundering. As criminal trends evolve, it is important we remain agile. As a collective, we have a much greater chance of success in suppressing this insidious criminal behavior.

GAMING POLICY & ENFORCEMENT  
BRANCH



CIFA-BC has been able to bring together trusted partners to discuss money laundering-related issues affecting us all, thereby enhancing our joint comprehension of the underlying risks, highlighting observations in emerging trends, and setting a baseline to develop appropriate mitigating strategies. CIFA-BC's leadership has enabled greater information and knowledge sharing through the diverse partnership it creates, which in turn, strengthens the overall AML regime.

FINANCIAL TRANSACTIONS AND  
RECORDS ANALYSIS CENTRE

To successfully detect, deter, and address money laundering, it is imperative to possess a strategy that supports collective cross-agency/public-private stakeholder involvement. CIFA-BC's strategic goals focus on constructing collaborative stakeholder alliances, alignment of regional priorities, and increased knowledge and information sharing to better understand how to curb financial crime. CIFA-BC has been instrumental in providing a platform to allied stakeholders to discuss and develop resources, policies, and processes necessary to disrupt illicit activity and its risk to public safety.

BC AML SECRETARIAT

Above all, BCFSA values the working relationships developed from participating at the partner level in CIFA-BC. The issues underpinning CIFA-BC discussions are complex and all member agencies have demonstrated that they have a role to play when it comes to tackling money laundering in our province and across Canada. Other CIFA-BC members know they can turn to BCFSA for support, advice, and partnership opportunities to strengthen the integrity of the financial services marketplace. BCFSA knows that CIFA-BC members will be there for us when we do the same.

BC FINANCIAL SERVICES AUTHORITY

Public-private partnership projects, such as CIFA-BC, improve the overall efficiency and effectiveness of the AML/ATF Regime through better information sharing and alignment of efforts at the national and regional levels. CIFA-BC has also been instrumental in raising awareness amongst the community on risks and trends in the AML space.

DEPARTMENT OF FINANCE CANADA

# OUR PARTNERS

## PRINCIPAL PARTNERS

- Bank of Montreal
- British Columbia Association of Chiefs of Police
- British Columbia Financial Services Authority
- British Columbia Lottery Corporation
- British Columbia Securities Commission
- Canada Border Services Agency
- Canada Revenue Agency
- Canada Western Bank
- Canadian Imperial Bank of Commerce
- Coast Capital Savings
- Combined Forces Special Enforcement Unit of British Columbia
- Financial Transactions and Reports Analysis Centre of Canada
- HSBC Bank Canada
- Ministry of Public Safety and Solicitor General of British Columbia - Gaming Policy and Enforcement Branch
- Royal Bank of Canada
- Royal Canadian Mounted Police - Federal and Serious Organized Crime - Financial Integrity
- The Bank of Nova Scotia
- The Toronto-Dominion Bank
- Vancouver City Savings Credit Union

## ASSOCIATE PARTNERS

- Automotive Retailers Association
- British Columbia Assessment Authority
- Chartered Professional Accountants of British Columbia
- Criminal Intelligence Service of British Columbia/ Yukon Territory
- Department of Finance Canada
- Department of Public Safety and Emergency Preparedness Canada – Financial Crime Coordination Centre
- Insurance Corporation of British Columbia
- Insurance Council of British Columbia
- International Centre for Criminal Law Reform
- Land Title and Survey Authority of British Columbia
- Law Society of British Columbia
- Ministry of Finance of British Columbia - Finance, Real Estate and Data Analytics
- Ministry of Public Safety and Solicitor General of British Columbia
  - AML Secretariat
  - Policing and Security Branch
- New Car Dealers Association of British Columbia
- Society of Notaries Public of British Columbia
- Union of British Columbia Municipalities
- Vehicle Sales Authority of British Columbia

# CIFA-BC COORDINATION OFFICE



**Cpl. Grace Wood**  
DIRECTOR OF OPERATIONS -  
PAST



**Cpl. Mathew Condon**  
DIRECTOR OF OPERATIONS -  
CURRENT



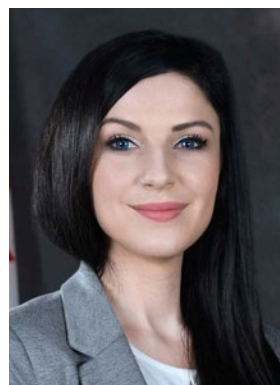
**Cpl. Dustin Young**  
MANAGER OF OPERATIONS



**Paige Morris**  
ADMINISTRATIVE  
RECORDS MANAGER



**Azadeh Bell-Irving**  
STRATEGIC RESEARCH  
ANALYST



**Dr. Catherine  
Shaffer-McCuish**  
STRATEGIC RESEARCH  
ANALYST

# STRATEGIC ADVISORY BOARD

## CO-CHAIRS



**A/Commr.  
Will Ng**



**Glen Lewis**

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**Barry MacKillop**



**Georgia Stavridis**



**Lori Mathison**



**Dr. Cristie Ford**



**Michele Jaggi-Smith**

The logo for CIFA-BC, featuring the text "CIFA-BC" in a bold, white, sans-serif font. A vertical line is positioned to the right of the text, separating it from the full name.

COUNTER ILLICIT  
FINANCE ALLIANCE  
BRITISH COLUMBIA

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