



April 08, 2026

Ref. 688406

**To:** British Columbia Lottery Corporation (BCLC) and Registered Gaming Facility Operators

**Re:** Reporting / Notification to the General Manager — *Gaming Control Act, SBC 2022, c. 29* (s.167)

This Memorandum provides direction on reporting obligations to the General Manager and takes effect on April 13, 2026, coinciding with the coming into force of the Gaming Control Act, SBC 2022, c. 29 (the ‘Act’). This memorandum replaces the previous version from July 16, 2025, which was issued under the former Gaming Control Act and Regulation.

Section 167 of the Act requires that the lottery corporation, a licensee or a registrant must immediately notify the general manager if the lottery corporation, licensee or registrant has reason to believe any of the following:

- (a) an offence may have been committed under this Act;
- (b) an offence relating to any of the following may have been committed under the *Criminal Code*:
  - (i) the conduct, management or operation of a lottery scheme;
  - (ii) participation in a lottery scheme;
  - (iii) horse racing.

For clarity, section 167 does not require certainty that an offence has occurred. The duty to report is triggered where there is reason to believe an offence under the Act or offence under the Criminal Code with relation to section 167(b)(i)(ii)(iii) may have been committed.

Appendix “A” to this memorandum identifies offences, offence related indicators and contextual links to the above noted gambling activities to aid in reporting decisions. The Appendix should not be read as an exhaustive list but rather a guide to assist in meeting the reporting obligations.

Where reporting is required under section 167 of the Act, BCLC and Registered Gaming Facility Operators are expected to report promptly and to provide a complete and accurate account of the information reasonably available to them at the time of reporting to enable timely regulatory assessment.

BCLC and registered gaming facility operators with access to the secure online reporting portal will continue to report section 167 notifications using the portal. Guidance documentation for section 167 online submissions is available on the portal and should be used as a reference guide for reporting. The guidance will be updated as required, and BCLC and registered gaming

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**Ministry of Public Safety  
and Solicitor General**

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facility operators must ensure they are referring to the most recent version of the guidance when reporting.

Registered gaming facility operators who do not use or cannot access the online portal must report to the General Manager either through their existing/alternate reporting process using the s.167 Reporting Template or alternatively contact their regional IGCO office to identify and implement an appropriate reporting mechanism.

The legal obligation to notify the General Manager in accordance with section 167 does not alleviate registrants of any contractual requirements to report matters to BCLC.

It is expected that this updated memorandum will be distributed to all appropriate staff within your organization.

Yours sincerely,

Sam MacLeod  
Assistant Deputy Minister and General Manager  
Gaming Policy and Enforcement Branch  
Ministry of Public Safety and Solicitor General



## **Appendix “A” - Section 167 – Reporting Guidance**

This guidance helps you decide when an incident must be reported under section 167 of the Gaming Control Act.

- It does not require certainty or proof.
- It does not replace internal incident management or police reporting.

Report immediately if you have reason to believe an offence *may* have occurred and the offence is meaningfully connected to:

- the conduct, management, or operation of a lottery scheme, or
- participation in a lottery scheme, or
- horse racing.

## **Criminal Code Offences Relating to Gambling Activities and Offence Related Indicators**

### **Cheating / game manipulation**

- Collusion between players, dealers, or insiders
- Manipulation or attempted manipulation of betting outcomes
- Use of devices, signals, systems, or insider information to influence outcomes

### **Fraud**

- Suspicious activity (e.g., match-fixing indicators)
- False identity or eligibility to gamble or claim prizes
- Manipulation of gaming systems, accounts, or payouts
- Counterfeit lottery tickets

### **Theft**

- Theft of gaming proceeds, chips, vouchers, or lottery products
- Theft by gaming workers that are linked to gaming duties
- Theft from patrons that are linked to gambling activity
- Organized or repeat theft patterns that compromises control of gaming proceeds, interferes with game fairness, or links to gaming systems or controls (i.e. player accounts, incentive programs, ticket validation processes, etc.)



## **Robbery**

- Robbery targeting gaming proceeds or gaming operations
- Robbery of patrons in relation to gambling proceeds or activity

## **Loan sharking**

- Chip or cash exchanges between patrons
- Unsourced chips in circulation
- Repayment activity observed on the gaming floor
- Intimidation or control linked to gambling debts

## **Money laundering / proceeds of crime**

- Suspicious transaction patterns connected to gambling participation or the operation of gambling-related platforms, devices or processes, including:
  - large cash transactions
  - unusual electronic transfers
  - third-party instruments or betting
  - minimal gaming with rapid redemption
  - cross-venue or cross-platform activity

## **Assaults**

- Assaults involving gaming workers in the course of their gaming duties
- Patron-on-patron assaults linked to gambling disputes, debts, or illicit activity
- Excessive use of force by gaming workers in the conduct of gaming duties

## **Threats or criminal harassment**

- Threats or harassment connected to gaming duties or enforcement actions
- Intimidation linked to gambling debts or gambling-related disputes

## **False identity or forged documents**

- False identity used to gamble, claim prizes, or bypass controls
- Evasion of source-of-funds or exclusion controls

## **Counterfeit currency**

- Counterfeit money or gaming chips used in gaming transactions or prize redemption



## **Weapons offence**

- Prohibited or concealed weapons where the circumstances are connected to gambling activity or gaming operations

## **Gaming Control Act Offences and Offence Related Indicators**

### **Minors**

- Permitting a minor to gamble, redeem prizes, or be present in a gaming facility or horse racing facility where not permitted by regulation
- Failure by a gaming service provider or gaming worker to prevent repeated access attempts by a minor
- Knowingly allowing or facilitating minor participation, including through adult intermediaries

### **Prohibited persons**

- Prohibited individuals entering, remaining, or gambling in gaming facilities
- Prohibited individual using false ID or third-party access credentials to breach their gambling prohibition
- Staff knowingly permitting access

### **Source of funds**

- Buy-ins over limits without required declarations
- False or misleading information on a SOF declaration
- Repeated or patterned source-of-funds irregularities indicating attempts to avoid or undermine SOF controls (Structuring)

### **Registration offences**

- Unregistered individuals performing regulated gaming work
- Unregistered service providers supporting gaming operations
- Continued work after registration suspension, expiry, or cancellation

### **Obstruction or failure to cooperate**

- Refusal or delay in providing required records
- Tampering with surveillance or audit materials



- Directing staff to withhold information where this interferes with regulatory oversight of gambling activities

### **Failure to report**

- Awareness of reportable conduct connected to gambling activities without notification
- Reliance on internal handling to avoid reporting
- Unexplained delay in reporting