

Case Study Overview Report

A. Scope of Overview Report

1. This overview report summarizes and attaches documents in relation to a series of events concerning one individual and his family members.

B. Summaries of Documents Appended

The Federal Court File

2. On April 26, 2016, the Canada Border Services Agency issued a decision to refer Mr. **Person A** to an admissibility hearing under s. 44(1) of the *Immigration and Refugee Protection Act*, SC 2001, c 27. That decision became the subject of an application by **Person A** for leave and for judicial review in the Federal Court of Canada, made May 26, 2016. On March 18, 2021, the Federal Court issued a confidentiality and sealing order over the file. Commission counsel obtained a full copy of the documents filed pursuant to that application prior to the issuance of the confidentiality and sealing order.

3. As part of his application record, **Person A** filed an affidavit which appended correspondence to **Person A** from the CBSA. Most of this correspondence has been excluded from this overview report pursuant to [REDACTED]. One piece of that correspondence enclosed a FINTRAC information disclosure issued to the CBSA regarding **Person A** dated May 2015, which is attached to this overview report as **Appendix A**.

4. On March 10, 2016, analysis of the FINTRAC disclosure was conducted by a Senior Forensic Accountant with the Forensic Accounting Management Group. An excerpt of that analysis is attached to this overview report as **Appendix B**. This analysis found:

Person A said he was steadily employed from 1983 to 1995. From the year 1998, **Person A** showed steady annual income peaking at the CAD equivalent of \$40,615. **Person B** was employed as a clerk with undisclosed income. Together they were able to amass the equivalent of CAD 1.26 million to come to Canada. This included their bank accounts, the value of their [REDACTED] home, and their investments in the businesses in China.

Unless they made considerably more before the majority of funds began to come to Canada in 2010, **Person A** and his family did not have sufficient resources to account for the

funds they transferred. The discrepancy between the funds they had available and the volume of the subsequent transfers to Canada is a significant indicator for money laundering activity.

5. Prior to the issuance of a confidentiality and sealing order over the court file in question, and upon request by Commission counsel, Canada produced a clearer copy of the chart included on the last page of the FINTRAC disclosure. That document is attached to this overview report as **Appendix C**.

6. The FINTRAC disclosure describes two suspicious transaction reports issued by UBS Bank (Canada) to FINTRAC in relation to Person A and his family members, arising from a series of deposits into an account held by Person A mother, Person D, over which account Person A held a power of attorney. The transactions described in the initial STR were ten deposits from four entities based in Hong Kong, China, which took place between December 13-16, 2011, and totaled \$2.1 million USD and \$5 million CAD.

7. The FINTRAC disclosure at Appendix B, Table 5, includes a prior series of ten large deposits into Vancouver-based bank accounts held by Person A and his family members that took place between January 26-29, 2010. The sending institutions for these transactions were a different four entities based in Hong Kong, China. These deposits totaled \$14,369,812 USD.

8. The Commission conducted open-source research on the four Hong Kong-based entities associated with the January 26-29, 2010 transfers. The results of that open-source research are attached to this overview report as **Appendix D**.

Transfers from Hong Kong Transferring Entities to Financial Institutions in BC

9. Additionally, the Commission issued a summons to several Canadian financial institutions in relation to the four Hong Kong-based entities associated with in the January 2010 transactions. Those summonses, some of which have been redacted pursuant to [REDACTED], are attached to this overview report at **Appendix E**. The summons sought production of “for each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any [summoned financial institution] account located in British Columbia.”

10. The Commission received responses to that summons from 11 financial institutions. Those responses, some of which have been redacted pursuant to [REDACTED], are attached to this overview report as follows:

- a. **Appendix F** - Royal Bank of Canada (“RBC”);

- b. **Appendix G** - Bank of Montreal (“BMO”);
- c. **Appendix H** - Toronto-Dominion Bank (“TD Bank”);
- d. **Appendix I** - Canadian Imperial Bank of Commerce (“CIBC”);
- e. **Appendix J** - Bank of Nova Scotia (“Scotiabank”);
- f. **Appendix K** - Hongkong and Shanghai Banking Corporation (“HSBC”);
- g. **Appendix L** - Canadian Western Bank (“CWB”);
- h. **Appendix M** - Blueshore Financial Credit Union
- i. **Appendix N** - Coast Capital Savings Credit Union;
- j. **Appendix O** - First West Credit Union; and
- k. **Appendix P** - Vancity Credit Union.

Real Estate Purchases in Vancouver, BC

11. On [REDACTED] 2007, Person A and Person B purchased property located at Address 1 [REDACTED], Vancouver, BC, [REDACTED], as joint tenants, for \$2, [REDACTED],000, without a registered mortgage. The Form A transfer form for this purchase is appended at Appendix Q.

12. On [REDACTED], 2012, Person C purchased property located at Address 2 [REDACTED] Vancouver BC, for \$14, [REDACTED],000, without a registered mortgage. She listed her address as Address 1 [REDACTED], and her occupation as “student”. The Form A transfer form for this purchase is appended at Appendix R.

13. On [REDACTED] 2015, Person A and Person B registered a name change to their property at Address 1 [REDACTED] : from Person A to Person A, and from Person B to Person B. On [REDACTED] 2015, Person C registered a name change to her property at Address 2 [REDACTED] : from Person C to Person C. Both Form 17 name change forms are appended at Appendix S.

14. On [REDACTED] 2016, Person C registered a mortgage from CIBC on title to Address 2 [REDACTED]. The value of that mortgage was \$8,000,000. The Form B mortgage form for this purchase is appended at Appendix T.

15. On [REDACTED] 2016, Person A purchased title to Address 3 [REDACTED], Vancouver, BC, [REDACTED], for \$15, [REDACTED],000, and registered a mortgage from CIBC for

\$7,800,000 on that property. **Person B** and **Person C** served as guarantors for this mortgage. The Form A transfer form and the Form B mortgage form for this purchase is appended at Appendix U.

16. On [REDACTED], 2016, **Person C** purchased property located at [REDACTED] **Address 4**, Vancouver, BC, [REDACTED], for \$1, [REDACTED], and registered a CIBC mortgage of \$1,100,001.00 on that property. The Form A transfer form and the Form B mortgage form for this purchase is appended at Appendix V.

17. On [REDACTED], 2016, **Person C** registered a mortgage from CIBC on title to **Address 2**. The value of that mortgage was \$7,000,000. The Form B mortgage form for this purchase is appended at Appendix W.

18. On [REDACTED], 2019, **Person C** registered a mortgage from CIBC on title to **Address 2**. The value of that mortgage was \$3,000,000. The Form B mortgage form for this purchase is appended at Appendix X.

19. On [REDACTED], 2021, **Person A** and **Person B** sold the property located at [REDACTED] **Address 1**, for \$4, [REDACTED],000. The Form A transfer form for this sale is appended at Appendix Y.

APPENDIX A

... at least seven types of indicators for money laundering were observed, particularly at the layering and integration stages when funds were moved from other countries and converted for Person A and his family's benefit.⁴³

ABILITY TO JUSTIFY WEALTH

The background section showed that Person A and Person B made representations to the CBSA regarding their wealth in October 2005. It was apparent from this document that there was a discrepancy between the resources that Person A and Person B had available in late 2005, and their subsequent financial activity as disclosed by FINTRAC for the approximate period 2006 to 2014.

Person A said he was steadily employed from 1983 to 1995. From the year 1998, Person A showed steady annual income peaking at the CAD equivalent of \$40,615. Person B was employed as a clerk with undisclosed income. Together they were able to amass the equivalent of CAD 1.26 million to come to Canada. This included their bank accounts, the value of their [REDACTED] home, and their investments in the businesses in China.

Unless they made considerably more before the majority of funds began to come to Canada in 2010, Person A and his family did not have sufficient resources to account for the funds they transferred. The discrepancy between the funds they had available and the volume of the subsequent transfers to Canada is a significant indicator for money laundering activity.⁴⁴

APPENDIX B

DISCLOSURE SUMMARY^{1 2}

Subject(s) ³ :	Person A Person B
Additional Subject(s) ⁴ :	Person D Company A
Number and Type of Reports:	2 Suspicious Transaction Report(s) (STR) 7 Large Cash Transaction Report(s) (LCTR) 60 Electronic Funds Transfer Report(s) (EFTR)
Related Disclosure(s):	-
Total Amount(s):	33,707,183.42 CAD 75,856,613.90 USD 250,100.00 EUR 18,021,083.98 HKD (Hong Kong Dollars) Approx. CAD equivalent: 114,003,534.77
Date Range:	2006-04-30 to 2014-11-28
Permission(s) Requested/Granted for Further Disclosure:	Permission granted for further disclosure to: RCMP FPCO - FC CRA Tax
International FIU(s) that have been/will be queried:	-
FINTRAC Contact:	Name of FAD Manager: Michael COWLEY Phone #: [REDACTED] Email: [REDACTED]
Date:	May 2015

¹ Reporting Entity's(ies') Grounds for Suspicion and Actions Taken found relevant by FINTRAC are quoted as reported.

² Where noted FINTRAC suspects mm=million.

³ FINTRAC has assessed all information contained in the original correspondence to us.

⁴ Additional subjects (individuals/entities) in this disclosure were identified through designated information.

Executive Summary:

This disclosure contains financial transactions involving Person A Person B and Person A mother Person D This disclosure also contains financial transactions involving the entity Company A , which is beneficially owned by Person D Reporting entity's grounds for suspicion indicates:

*"The UBS Client Advisor followed up with the Client's son, Mr. Person A (DOB [REDACTED], address: [REDACTED] Vancouver B.C. [REDACTED]). Person A acts on behalf of the Client (Person D based on a legal power of attorney, and has been the primary client contact since the relationship was established with UBS Bank (Canada))."*⁵

Disclosure subject(s) for which the FINTRAC database contains transactions:

Person A
Person B

Additional subject(s) identified through designated information:

Person D

was found in an STR to be the mother of disclosure subject Person A
As per the STR, Person A acts on behalf of Person D based on a legal power of attorney, and is the primary client contact for Person D 's accounts held at UBS BANK (CANADA). Person D is also listed at the same address as Person A [REDACTED] Vancouver, BC. Person A was the ordering client on electronic funds transfers ordered from an account held by Person D

Company A

listed in the Bahamas, was found in an STR to be "beneficially owned" by disclosure subject Person D

⁵ Source: STR

Financial Transactions:

Person A (Tables 1 and 2)

Table 1 contains an electronic funds transfer ordered to the benefit of an account jointly held by Person A and Person B on 2008-02-05, totalling 9,000,000.00 HKD. The ordering client was Company B, address listed in China.

Table 1 also contains electronic funds transfers ordered from accounts held by Person A or jointly held by Person A and Person B between 2008-04-18 and 2012-04-20, totalling 9,021,083.98 HKD (Hong Kong Dollars), and 227,360.12 USD. Beneficiaries include:

- Person D
- Person B
- Person A
- [REDACTED] UNIVERSITY – remittance information indicates "Tuition fee for Person C"
- THE UNIVERSITY [REDACTED] – remittance information indicates "Student name Person C"

Table 2 contains a foreign currency exchange conducted by Person A on 2009-03-03; 25,588.00 CAD was exchanged for 20,000.00 USD.

Person D (Tables 3, 4 and 5)

Table 3 contains electronic funds transfers or wire transfers ordered from or to the benefit of an account held by Person D on 2011-12-15 and 2012-03-13, totalling 6,276,000.00 CAD and 4,523,000.00 USD. As per the reporting entity's grounds for suspicion found relevant by FINTRAC:

*"During the period of December 13-16, 2011 a number of large CAD and USD payment inflows were forwarded to UBS Bank (Canada) from the Bank of China Hong Kong Ltd. for an account held by Mrs. Person D (...) When asked about the nature of the payments and the connection between the ordering parties to the account holder, the UBS Bank (Canada) Client Advisor indicated that the funds were proceeds of a partial land sale that the account holder holds in PRC, and is in the process of selling to developers. (...) The Client Advisor further indicated that the client was not familiar with the payment ordering parties, that she provided her UBS banking information to the purchasing party and was simply concerned about receiving the correct total amount according to the purchase price."*⁶

⁶ Source: STR

The reporting entity's grounds for suspicion found relevant by FINTRAC also indicate:

"The UBS Client Advisor followed up with the Client's son, Mr. Person A (DOB [REDACTED], address: [REDACTED] Vancouver B.C. [REDACTED]). Person A acts on behalf of the Client based on a legal power of attorney, and has been the primary client contact since the relationship was established with UBS Bank (Canada). (...) While Person A did provide additional details regarding the Client's initial land acquisition in the 1980's, he was unwilling to provide any satisfactory documentation confirming legal title over the land in [REDACTED], or in relation to any land sale transactions, citing reasons of privacy.⁷ As a consequence, UBS Bank (Canada) has required the Client to transfer the account assets to another institution, after which time the accounts will be closed."⁸

Table 4 contains electronic funds transfers ordered by Person D from accounts held in Canada and the USA, between 2010-02-25 and 2014-04-10, totalling 24,292,953.00 CAD and 13,386,859.00 USD. Beneficiaries are:

- Person D accounts held at CITIBANK or BANK OF MONTREAL
- CITIBANK BAHAMAS, CITIBANK NEW YORK, or CITIBANK CANADA
- KERFOOT BURROUGHS AND COIN TRUST
- THE SWATCH GROUP (US) INC.

Table 5 contains electronic funds transfers ordered to the benefit of Person D between 2010-01-26 and 2012-09-12, totalling 3,029,986.63 CAD and 21,589,712.00 USD. Ordering clients include:

- Company A – reporting entity's grounds for suspicion found relevant by FINTRAC indicate Person D is the beneficial owner of Company A
- KINGSON CO., listed at an address in Hong Kong
- ZHONG SHENG INVESTMENT DEVELOPMENT COMPANY, listed at an address in Hong Kong

⁷ Money Laundering Indicator: Defensive stance to questioning.

⁸ Source: STR

Company A

(Table 6)

Table 6 contains electronic funds transfers ordered by or to the benefit of Company A Between 2010-05-07 and 2010-05-13, electronic funds transfers ordered to the benefit of Company A totalled 30,844,666.53 USD. Ordering clients are:

- SHANGHAI MILLION INTERNATIONAL TRADE CO. LTD., listed at an address in China
- SUN CENTURY INTERNATIONAL LIMITED, listed at an address in the British Virgin Islands
- SHANGHAI JUCHENG INTERNATIONAL TRADE CO. LTD., listed at an address in China

Between 2011-07-28 and 2014-11-28, electronic funds transfers ordered by Company A totalled 69,529.36 USD. Beneficiaries are:

- UBS TRUSTEES (BAHAMAS) LTD.
- Company A the electronic funds transfer was sent from CIBC in Toronto, Canada, and was received at CIBC TRUST COMPANY (BAHAMAS) LTD.

Person B

(Tables 7 and 8)

Table 7 contains cash deposits conducted by Person B to accounts held by Person B or an account jointly held by Person B and Person A Between 2006-04-30 and 2007-11-01, the cash deposits totalled 65,000.00 CAD and 20,000.00 USD.

Table 8 contains electronic funds transfers ordered by Person B between 2006-11-01 and 2014-07-29, totalling 17,655.79 CAD, 250,100.00 EUR and 5,195,486.89 USD. The electronic funds transfers were sent by institutions listed at addresses in Switzerland, China, Canada, or Singapore. The beneficiaries include:

- Person B to accounts held at HSBC BANK CANADA
- CITIBANK NA PBG NASSAU. remittance information indicates "FFC TO Person D
- Person G listed at an address in China

This disclosure contains information that the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) has reasonable grounds to suspect would be relevant to an investigation or prosecution of a money laundering offence. The Centre also determined that the information is relevant to determining whether a person is a person described in sections 34 to 42 of the Immigration and Refugee Protection Act or is relevant to an offence under any of sections 91, 117 to 119, 126 or 127 of that Act. The Centre also has reasonable grounds to suspect that the information would be relevant to investigating or prosecuting an offence of obtaining or attempting to obtain a rebate, refund or credit to which a person or entity is not entitled, or of evading or attempting to evade paying taxes or duties imposed under an Act of Parliament administered by the Minister of National Revenue. This disclosure is being made in accordance with subsection 55(3) of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)

This statute establishes FINTRAC as the agency authorized to receive, analyze, assess and disclose financial information to assist in the detection and deterrence of money laundering and of the financing of terrorist activities.

Reporting Entity (RE)

The businesses and individuals with legal obligations under Canada's *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA) and its accompanying regulations are known collectively as reporting entities. Reporting entities fall into one of nine sectors: accountants, British Columbia notaries, casinos, dealers in precious metals and stones, financial entities, life insurance, money services businesses, real estate, securities dealers.

Casino Disbursement Report (CDR)

A report that a casino covered by the PCMLTFA must file with FINTRAC when it makes a disbursement of \$10,000 or more in the course of a single transaction, or when it makes two or more disbursements totalling \$10,000 or more that it knows were made within 24 consecutive hours (see 24-Hour Rule below) on behalf of the same individual or entity. Reporting entities have to file the report within 15 days after the date of disbursement.

Cross-Border Currency Report (CBCR)

A report that must be filed with CBSA by a person entering or leaving Canada advising that the person is carrying large sums of currency or monetary instruments (\$10,000 or more), or by a person mailing or sending such large sums into or out of Canada.

Cross-Border Seizure Report (CBSR)

A report received by FINTRAC from a CBSA officer who seizes cash or monetary instruments for which reporting obligations were not met.

Electronic Funds Transfer Report (EFTR)

A report that a reporting entity must file with FINTRAC in respect of a transmission of instructions for the transfer of \$10,000 or more **out of or into Canada** in a single transaction or in two or more transactions totalling \$10,000 or more that it knows were made within 24 consecutive hours (see 24-Hour Rule below) of each other by or on behalf of the same individual or entity, through any electronic, magnetic or optical device, telephone instrument or computer. Reporting entities have to file the EFTR within 5 days after the date of the transaction.

Large Cash Transaction Report (LCTR)

A report that a reporting entity must file with FINTRAC when it receives \$10,000 or more in cash in the course of a single transaction, or when it receives two or more cash amounts totalling \$10,000 or more that it knows were made within 24 consecutive hours (see 24-Hour Rule below) of each other by or on behalf of the same individual or entity. Reporting entities have to file the LCTR within 15 days after the date of the transaction.

Suspicious Transaction Report (STR) and Suspicious Transactions Report – Attempted (STR-A)

A report that a reporting entity must file with FINTRAC in respect of a financial transaction that occurs or that is attempted in the course of its activities, and for which there are reasonable grounds to suspect that the transaction is related to the commission or attempted commission of a money laundering or terrorist activity financing offence. Reporting entities have to file the report within 30 days after the date they detect a fact that constitutes suspicions.

Terrorist Property Report (TPR)

A report that a reporting entity must file with FINTRAC when they know that there is property in their possession or control that is owned or controlled by or on behalf of a terrorist or terrorist group.

24-Hour Rule

Reporting entities must file an LCTR, EFTR or CDR when two or more transactions of less than \$10,000 that total \$10,000 or more were made within 24 consecutive hours of each other by or on behalf of the same individual or entity. FINTRAC may disclose some or all transactions received under the 24-Hour rule which means that a disclosure may contain transactions that appear to be under the reporting threshold when in fact it is part of a series of transactions conducted within 24 hours some of which are not disclosed.

For further information please consult FINTRAC's website: www.fintrac-canafe.gc.ca

FACT SHEET TABLE OF CONTENTS^{1 2}

Person A	2
Person D	4
Company A	10
Person B	12

¹ Reporting Entity's(ies') Grounds for Suspicion and Actions Taken found relevant by FINTRAC are quoted as reported.

² Where noted FINTRAC suspects mm= million.

FACT SHEET – INDIVIDUAL

Name	Person A	
Aliases	Person A	
Gender	Male	
Date of birth	[REDACTED]	
Address(es)	[REDACTED] Vancouver, BC, [REDACTED]	
Telephone number(s)	[REDACTED]	
Citizenship	Chinese	
Identifying information (Type and #)	-	
Occupation(s) and/or Business activities	Unemployment Retired	
Relationships suspected on reasonable grounds to exist	Son of Person D – Person A acts on behalf of Person D based on a legal power of attorney.	
Table Number(s) Relating to Individual	1,2,3,7	

RELEVANT CRIMINAL RECORD AND/OR ANY CRIMINAL CHARGES ☐

Date(s)	Relevant details of the criminal record and/or any criminal charges	Jurisdiction (if relevant to a foreign country)
-	Bribery	China (INTERPOL)

Account information		
Institution	HSBC BANK CANADA	
Street address	-	
Transit number	-	
Account number(s)	[REDACTED]	
Type of account	-	
Account currency	-	
Account holder(s)	Person A	Person B

Institution	-	
Street address	-	
Transit number	-	
Account number(s)	-	
Type of account	-	
Account currency	-	
Account holder(s)	Person A	
Institution	TORONTO DOMINION BANK	
Street address	-	
Transit number	-	
Account number(s)	0047-	
Type of account	-	
Account currency	-	
Account holder(s)	Person A	
Institution	TD CANADA TRUST	
Street address	2198 West 41 Ave, Vancouver, BC, V6M 1Z1	
Transit number	00470	
Account number(s)	-	
Type of account	-	
Account currency	-	
Account holder(s)	Person A / Person B	
Institution	HSBC BANK CANADA	
Street address	2164 West 41 st Avenue, Vancouver, BC, V6M 1Z1	
Transit number	10110	
Account number(s)	-	
Type of account	Personal	
Account currency	USD	
Account holder(s)	Person A / Person B	

PUBLICLY AVAILABLE INFORMATION (PAI) ATTACHED? Yes ☐ No ☒

FACT SHEET – INDIVIDUAL

Name	Person D	
AKAs	-	
Gender	Female	
Date of birth	-	
Address(es)	[REDACTED] Vancouver, BC, [REDACTED] [REDACTED] China [REDACTED] Vancouver, BC, [REDACTED]	
Telephone number(s)	-	
Citizenship	-	
Identifying information (Type and #)	-	
Email address	-	
Web site	-	
Occupation(s) and/or Business activity(ies)	"Beneficial Owner" – Company A	
Relationship(s) suspected on reasonable grounds to exist	Mother of Person A Mother in-law of Person B	
Table Number(s) Relating to Individual	1,3,4,5	

NO (RELEVANT) CRIMINAL RECORD AND/OR ANY CRIMINAL CHARGES ☒

Account information		
Institution	CITIBANK	
Street address	153 East 53 rd Street, New York, NY, 10043 USA	
Transit number	-	
Account number(s)	██████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	
Institution	CIBC	
Street address	400 Burrard St, Vancouver, BC, V6C 3A6	
Transit number	00010	
Account number(s)	██████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	
Institution	UBS BANK (CANADA)	
Street address	-	
Transit number	-	
Account number(s)	██████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	
Institution	CITIBANK	
Street address	-	
Transit number	-	
Account number(s)	████████████████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	
Institution	CIBC	
Street address	-	
Transit number	-	
Account number(s)	██████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	
Institution	BANK OF MONTREAL	
Street address	2102 West 41 st Avenue, Vancouver, BC, V6M 1Z2	
Transit number	07240	
Account number(s)	██████████	
Type of account	-	
Account currency	-	
Account holder(s)	Person D	

Institution	BANK OF MONTREAL
Street address	2102 West 41 st Avenue, Vancouver, BC, V6M 1Z2
Transit number	07240
Account number(s)	[REDACTED]
Type of account	-
Account currency	-
Account holder(s)	Person D
Institution	-
Street address	-
Transit number	-
Account number(s)	[REDACTED]
Type of account	-
Account currency	-
Account holder(s)	Person D

INFORMATION REPORTED TO FINTRAC IN SUSPICIOUS TRANSACTION REPORT(S) (STR)

Reporting Entity/Place of transaction	UBS BANK (CANADA) / 999 West Hastings Street, Vancouver, BC, V7X 1L3
Transaction date	2011-12-15
Table #	3
Account holder	Person D
Sanctioner	-
REPORTING ENTITY'S GROUNDS FOR SUSPICION FOUND RELEVANT BY FINTRAC	
<p>"On January 5, 2012 the below series of transactions was escalated within UBS Compliance for further review in accordance with the Unusual Transaction Reporting procedure. During the period of December 13-16, 2011 a number of large CAD and USD payment inflows were forwarded to UBS Bank (Canada) from the Bank of China Hong Kong Ltd. for an account held by Mrs. Person D. Details of payments with ordering party information are listed below:</p> <p>13 December 2011</p> <ul style="list-style-type: none"> ■ USD \$399,980.00 from Hing Lung Trading Company, acct. [REDACTED] <p>14 December 2011</p> <ul style="list-style-type: none"> ■ USD \$349,980.00 from Hing Lung Trading Company, acct. [REDACTED] ■ USD \$399,980.00 from Hing Lung Trading Company, acct. [REDACTED] ■ USD \$349,980.00 from Hong Kong Wang Hing Lung Trading Co., acct. [REDACTED] ■ CAD \$1,000,000.00 from Forever Smart Trading Limited, acct. [REDACTED] 	

15 December 2011

■CAD \$999,963.63 from Zhong Sheng Investment Development, acct. [REDACTED]

■CAD \$2,000,000.00 from Zhong Sheng Investment Development, acct [REDACTED]

16 December 2011

■USD \$309,980.00 from Hing Lung Trading Company, acct. [REDACTED]

■USD \$289,980.00 from Hing Lung Trading Company, acct. [REDACTED]

■CAD \$1,030,000.00 from Forever Smart Trading Limited, acct. [REDACTED]

When asked about the nature of the payments and the connection between the ordering parties to the account holder, the UBS Bank (Canada) Client Advisor indicated that the funds were proceeds of a partial land sale that the account holder holds in PRC, and is in the process of selling to developers. UBS Bank (Canada) records concerning the account holder holds 320 acres of land in [REDACTED] (tier one municipality in PRC), and has been active in many PRC real estate development projects since the early 1980's. The Client Advisor further indicated that the client was not familiar with the payment ordering parties, that she provided her UBS banking information to the purchasing party and was simply concerned about receiving the correct total amount according to the purchase price. The assumption offered by the account holder was that ordering parties were affiliated in some way with the party that purchased the land.

This series of transactions was flagged through standard payment monitoring reviews conducted by UBS Bank (Canada) Compliance. In the context of money laundering, it was determined by Compliance that such a high number of large third party payments occurring over such a relatively short period could be an indication of "layering", where complex layers of financial transactions are executed to obscure the source and ownership of funds.

UBS Compliance confirmed that neither the account holder nor any of the ordering party names was indicated by UBS proprietary wire payment screening tools or client-vetting databases as being associated with any known or suspected money laundering or terrorist financing activity.

UBS Compliance has also asked that the UBS Client Advisor obtain further information to substantiate the account holder's source of wealth. Specifically requested were further detail around the account holder's initial land acquisition in the early 1980's, documentation confirming the account holder's legal title over the 320 acres in [REDACTED] and further information concerning the company/companies that purchased the land from the account holder."

REPORTING ENTITY'S ACTIONS TAKEN

"The account remains under heightened ongoing transaction monitoring by UBS Compliance."

Reporting Entity/Place of Transaction	UBS BANK (CANADA) / 999 West Hastings Street, Vancouver, BC, V7X 1L3
Transaction date	2012-03-13
Table #	3
Account holder	Person D
Compliator	Person A

**REPORTING ENTITY'S GROUNDS FOR SUSPICION
FOUND RELEVANT BY FINTRAC**

"This report is being filed as a follow-up report to FINTRAC (...) (the "Initial Report"), submitted by UBS Bank (Canada) on 24 January, 2012.

The Initial Report concerned a number of third party payment inflows to an account held by Mrs. Person D (the "Client") that occurred between 13 December 2011 and 16 December 2011, and which were initiated by 4 different companies based in Hong Kong. At that time, the Client indicated that the funds were proceeds of a partial sale of land that the client holds in [REDACTED] Province, China (see further details in the Initial Report).

The payment inflows were deemed to be suspicious based on the understanding that such a high number of third party payments occurring over such a relatively short period could be an indication of layering, where complex layers of financial transactions are used to obscure the source and ownership of funds.

As a result of the suspicious activity, UBS Bank (Canada) determined it necessary to obtain further information to substantiate the Client's source of wealth in order to continue the client relationship. Specifically requested from the UBS Client Advisor were:

- Details around the account Client's initial land acquisition in the early 1980's
- Documentation confirming the account holder's legal title over the 320 acres in [REDACTED] Province
- Further information concerning the company/companies that purchased the land from the account holders

The UBS Client Advisor followed up with the Client's son, Mr. Person A (DOB [REDACTED], address: [REDACTED] Vancouver B.C. [REDACTED]). Person A acts on behalf of the Client based on a legal power of attorney, and has been the primary client contact since the relationship was established with UBS Bank (Canada). While Person A did provide additional details regarding the Client's initial land acquisition in the 1980's, he was unwilling to provide any satisfactory

documentation confirming legal title over the land in [REDACTED], or in relation to any land sale transactions, citing reasons of privacy. As a consequence, UBS Bank (Canada) has required the Client to transfer the account assets to another institution, after which time the accounts will be closed.

The accounts subject to exit and transfer are maintained as part of broader client relationship. Details of the holdings within the client relationship are distributed as follows (assets values indicated are current as of the date of this report):

- Individual account [REDACTED] Person D (the "Client") - CAD 6.7mm maintained in a non-discretionary Active Advisory account.
- Individual account [REDACTED] Person B (daughter-in-law of the Client) - CAD 3.2mm maintained in a non-discretionary Active Advisory account
- Trust accounts [REDACTED] [REDACTED] [REDACTED] Company A
(A Bahamas-registered investment holding company beneficially owned by the Client, with UBS Trustees (Cayman) as Authorized Signatories) - 34.6mm maintained in 3 discretionary Portfolio Management accounts.

Certain illiquid assets that cannot be transferred to another institution may remain in UBS Bank (Canada) accounts that will be blocked to permit only liquidations, with the requirement that any proceeds be immediately transferred to another institution.

The 5 payment transactions referenced in this Suspicious Transactions Report ("STR") were the first outflows to occur following communication of the requirement for the Client to transfer assets from UBS Bank (Canada)."

REPORTING ENTITY'S ACTIONS TAKEN

"The account is currently undergoing exit and remains under a Compliance block for review of all initiated activity. All further dispositions will be reported to FINTRAC."

PUBLICLY AVAILABLE INFORMATION (PAI) ATTACHED? Yes ☐ No ☒

FACT SHEET – CORPORATION/ENTITY

Corporation/Entity Name	Company A
Also operating as	Company A
Address(es)	[REDACTED] Bahamas, [REDACTED] Bahamas
Telephone number(s)	-
E-mail address	-
Website	-
Business activity(ies)	-
Relationship(s) (Partners, Sole Proprietor, Trustees)	Beneficial owner – Person D
Table Number(s) Relating to Corporation/Entity	5,6

Director/Officer/ Majority Shareholder Information	Incorporation Number	Date of Incorporation (yy/mm/dd)	Jurisdiction of Incorporation
-	-	-	-

Account information	
Institution	UBS BANK (CANADA)
Street address	-
Transit number	-
Account number(s)	[REDACTED]
Type of account	Trust Account
Account currency	-
Account holder(s)	Company A
Signing authority(ies)	UBS TRUSTEES (CAYMAN)
Institution	UBS BANK (CANADA)
Street address	-
Transit number	-
Account number(s)	[REDACTED]
Type of account	Trust Account
Account currency	-
Account holder(s)	Company A
Signing authority(ies)	UBS TRUSTEES (CAYMAN)
Institution	CIBC
Street address	-
Transit number	-
Account number(s)	[REDACTED]
Type of account	-
Account currency	-
Account holder(s)	Company A
Signing authority(ies)	-
Institution	-
Street address	-
Transit number	-
Account number(s)	[REDACTED]
Type of account	-
Account currency	-
Account holder(s)	-
Signing authority(ies)	-

PUBLICLY AVAILABLE INFORMATION (PAI) ATTACHED? Yes ☐ No ☒

FACT SHEET – INDIVIDUAL

Name	Person B	
AKAs	Person B	
Gender	Female	
Date of birth	[REDACTED]	
Address(es)	[REDACTED] Vancouver, BC, [REDACTED]	
	[REDACTED]	
	[REDACTED] China	
	[REDACTED] Vancouver, BC, [REDACTED]	
Telephone number(s)	[REDACTED]	
	[REDACTED]	
Citizenship	[REDACTED]	
Identifying information (Type and #)	Chinese Passport	[REDACTED]
Occupation(s) and/or Business activity(ies)	Homemaker Unemployed CEO	
Relationships suspected on reasonable grounds to exist	Daughter in-law of Person D	
Table Number(s) Relating to individual	1,7,8	

NO (RELEVANT) CRIMINAL RECORD AND/OR ANY CRIMINAL CHARGES ☒

Account Information		
Institution	HSBC BANK CANADA	
Street address	-	
Transit number	-	
Account number(s)	CAHKBC [REDACTED]	
Type of account	-	
Account currency	-	
Account holder(s)	Person A Person B	
Institution	TD CANADA TRUST	
Street address	2198 West 41 Ave, Vancouver, BC, V6M 1Z1	
Transit number	00470	
Account number(s)	[REDACTED]	
Type of account	-	
Account currency	-	
Account holder(s)	Person A / Person B	
Institution	UBS BANK (CANADA)	
Street address	-	
Transit number	-	
Account number(s)	[REDACTED]	
Type of account	-	
Account currency	-	
Account holder(s)	Person B	
Institution	HSBC BANK CANADA	
Street address	2164 West 41 st Avenue, Vancouver, BC, V6M 1Z1	
Transit number	10110	
Account number(s)	[REDACTED]	
Type of account	Personal	
Account currency	CAD	
Account holder(s)	Person B	
Institution	HSBC BANK CANADA	
Street address	2164 West 41 st Avenue, Vancouver, BC, V6M 1Z1	
Transit number	10110	
Account number(s)	[REDACTED]	
Type of account	Personal	
Account currency	USD, HKD	
Account holder(s)	Person B Person A	
Institution	CIBC	
Street address	-	
Transit number	-	
Account number(s)	[REDACTED]	
Type of account	-	
Account currency	-	
Account holder(s)	Person B	

Institution	DEUTSCHE BANK AG	
Street address	-	
Transit number	-	
Account number(s)	[REDACTED]	
Type of account		
Account currency		
Account holder(s)	Person B	

PUBLICLY AVAILABLE INFORMATION (PAI) ATTACHED? Yes ☐ No ☒

TABLE OF CONTENTS: SUMMARY OF FINANCIAL TRANSACTIONS - TABLES 1 - 8

TABLE NUMBER	DATE RANGE		CASH FLOW			
	FROM	TO	IN	OUT	NET	BALANCE
Table 1 - Electronic Funds Transfers Ordered by or to the Benefit of Person A and/or Person B	2008-04-18	2012-04-20	-	227,360.12	-	18,021,083.98
Table 2 - Foreign Currency Exchange Conducted by Person A	2009-03-03		26,588.00	-	-	-
Table 3 - Electronic Funds Transfers Involving an Account Held by Person D	2011-12-15	2012-03-13	6,278,000.00	4,523,000.00	-	-
Table 4 - Electronic Funds Transfers Ordered by Person D	2010-02-26	2014-04-10	24,292,953.00	13,398,859.00	-	-
Table 5 - Electronic Funds Transfers Ordered to the Benefit of Person D	2010-01-28	2012-09-12	3,028,988.63	21,588,712.00	-	-
Table 6 - Electronic Funds Transfers Ordered by or to the Benefit of Company A	2010-05-07	2014-11-28	-	30,814,196.89	-	-
Table 7 - Cash Deposits Conducted by Person B	2008-04-30	2007-11-01	65,000.00	20,000.00		
Table 8 - Electronic Funds Transfers Ordered by Person B	2008-11-01	2014-07-29	17,856.79	5,185,486.89	250,100.00	
Date Range and Total	2008-04-30	2014-11-28	33,707,183.42	75,856,613.90	250,100.00	18,021,083.98

Overall approximate amount in CAD	114,003,634.77
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Table 2 - Foreign Currency Exchange Conducted by Person A

LCR	Date	Company Name	Address	City	Province	Country	Occupation	Amount	Currency	Value	Unit	
LCTR	2009-03-03	EVERFOREX FINANCIAL CORP	430-6900 NO. 3 ROAD RICHMOND, BC V6X 3P7 CANADA				Person A [REDACTED] VANCOUVER, BC [REDACTED] CANADA	[REDACTED] RETIRED [REDACTED]	25,588.00	CAD	20,000.00	USD

STAV/STB	2011-01-16	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person C	[REDACTED]	PERSONAL CAD	ELECTRONIC FUNDS TRANSFER CROERED BY ZICHOU SHENG INVESTMENT DEVELOPMENT, BANK OF CHINA HONG KONG ACCOUNT [REDACTED]	3,000,000.00	CAD	<p>"During the period of December 12-16, 2011 a number of large CAD and USD payment inflows were forwarded to USB Bank (Canada) from the Bank of China Hong Kong Ltd. for an amount held by Mrs. Persson (Daughter of payments with enclosing party information) are listed below:</p> <p>13 December 2011</p> <ul style="list-style-type: none"> • USD 3389,940.00 from Hong Kong Trading Company, acct. [REDACTED] <p>14 December 2011</p> <ul style="list-style-type: none"> • USD 1512,940.00 from Hong Kong Trading Company, acct. [REDACTED] • USD 3293,980.00 from Hong Kong Trading Company, acct. [REDACTED] • USD 1319,080.00 from Hong Kong Trading Co., Ltd., acct. [REDACTED] • CAD 11,000,000.00 from Forever Asset Trading Limited, acct. [REDACTED] <p>15 December 2011</p> <ul style="list-style-type: none"> • CAD 1991,943.00 from Zhong Sheng Investment Development, acct. [REDACTED] • CAD 32,800,000.00 from Zhong Sheng Investment Development, acct. [REDACTED] <p>16 December 2011</p> <ul style="list-style-type: none"> • USD 1308,940.00 from Hong Kong Trading Company, acct. [REDACTED] • USD 1214,940.00 from Hong Kong Trading Company, acct. [REDACTED] • CAD 21,000,000.00 from Forever Asset Trading Limited, acct. [REDACTED] <p>(-)</p> <p>When asked about the nature of the payments and the association between the sending parties to the account holder, the USB Bank (Canada) Client Advisor indicated that the funds were proceeds of a partial land sale that the account holder held in PNG, and is in the process of being developed. (-) The Client Advisor further indicated that the client was not familiar with the payment sending parties, that she provided her USB banking information to the purchasing party and was simply concerned about receiving the correct total amount according to the purchase price."</p>		
STB	2012-01-11	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person D	[REDACTED]	PERSONAL USD	Person A [REDACTED] VANCOUVER, BC CANADA	OTZIN CH [REDACTED] RETIRED	ELECTRONIC FUNDS TRANSFER TO THE BENEFIT OF CITI ACCOUNT [REDACTED]	1,000,000.00	USD	
STB	2012-01-11	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person D	[REDACTED]	PERSONAL USD	Person A [REDACTED] VANCOUVER, BC CANADA	OTZIN CH [REDACTED] RETIRED	WIRE TRANSFER TO THE BENEFIT OF CIBC ACCOUNT [REDACTED]	1,000,000.00	USD	<p>"The USB Client Advisor informed (-) the Client's son, Person A, (DOB [REDACTED] address [REDACTED] 84, Vancouver B.C. Person A is on [REDACTED] basis (-) based on a legal power of attorney, and has been the primary when [REDACTED] and the relationship was established with USB Bank (Canada). (-)</p> <p>When Person D provided additional details regarding the Client's total land acquisition in the 1980s, he was unwilling to provide any satisfactory documentation regarding legal title over the land [REDACTED] as it relates to any land sale transactions, along income eligibility. As a consequence, USB Bank (Canada) requested the Client to transfer the account details to another party, after which time the account will be closed. (-)</p> <p>The 8 payment transactions referenced in the Suspicious Transaction Report (STR) were the last actions in some following communication of the requirement by the Client to transfer assets from USB Bank (Canada). (-)</p> <p>The account is currently undergoing sale and remains under a Disposition Block for review of all related activity."</p>
STAV/STB	2012-01-11	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person D	[REDACTED]	PERSONAL USD	Person A [REDACTED] VANCOUVER, BC CANADA	OTZIN CH [REDACTED] RETIRED	ELECTRONIC FUNDS TRANSFER TO THE BENEFIT OF BMO ACCOUNT [REDACTED]	1,333,000.00	USD	
STB	2012-01-11	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person D	[REDACTED]	PERSONAL CAD	Person A [REDACTED] VANCOUVER, BC CANADA	OTZIN CH [REDACTED] RETIRED	WIRE TRANSFER TO THE BENEFIT OF CIBC ACCOUNT [REDACTED]	1,000,000.00	CAD	
STB	2012-01-11	USB BANK (CANADA)	599 WEST HASTINGS ST VANCOUVER, BC V7X 1L3 CANADA	Person D	[REDACTED]	PERSONAL CAD	Person A [REDACTED] VANCOUVER, BC CANADA	OTZIN CH [REDACTED] RETIRED	WIRE TRANSFER TO THE BENEFIT OF BMO ACCOUNT [REDACTED]	274,600.00	CAD	

Table 4 - Electronic Funds Transfers Ordered by Person D

Transaction Type	Date	Originator	Beneficiary	Amount	Currency	Reference
EFTR	2010-02-25	Person D CHINA	CIBC TORONTO	00010	USD	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA
EFTR	2012-03-13	Person D CHINA			USD	BANK OF AMERICA 222 BROADWAY NEW YORK, NY 10038 USA
EFTR	2012-03-27	Person D VANCOUVER, BC CANADA			CAD	CITIBANK 100 EAST 63RD STREET NEW YORK, NY 10043 USA
EFTR	2012-04-18	Person D CHINA			USD	CITIBANK 100 EAST 63RD STREET NEW YORK, NY 10043 USA
EFTR	2012-05-01	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO M5G 2M8 CANADA	811	USD	CITIBANK 100 EAST 63RD STREET NEW YORK, NY 10043 USA
EFTR	2012-05-17	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		CAD	CITIBANK CANADA 15TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA
						ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA
						CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA
						CITIBANK THOMPSON BOULEVARD P O BOX 88188 NASSAU, BAHAMAS

Table 4 - Electronic Funds Transfers Ordered by Person D.

EFT#	2012-05-18	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA	ROYAL BANK OF CANADA 180 WELLINGTON STREET TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 16TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA		1,015,000.00	CAD	REF INCREASE CRA 38500519 W21381352
					ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK THOMPSON BOULEVARD P O BOX N8168 NASSAU, BAHAMAS					
EFT#	2012-05-18	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA	ROYAL BANK OF CANADA 180 WELLINGTON STREET TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 16TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA		1,015,000.00	CAD	REF INCREASE CRA 38500519 W21381353
					ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK THOMPSON BOULEVARD P O BOX N8168 NASSAU, BAHAMAS					
EFT#	2012-05-18	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA	ROYAL BANK OF CANADA 180 WELLINGTON STREET TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 16TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA		1,015,000.00	CAD	REF INCREASE CRA 38500519 W21381373
					ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK THOMPSON BOULEVARD P O BOX N8168 NASSAU, BAHAMAS					
EFT#	2012-05-22	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA	ROYAL BANK OF CANADA 180 WELLINGTON STREET TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 16TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA		1,020,000.00	CAD	REF INCREASE CRA 38500519 W21436150
					ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK THOMPSON BOULEVARD P O BOX N8168 NASSAU, BAHAMAS					

Table 4 - Electronic Funds Transfers Ordered by Person D

Transaction Type	Transaction Date	Originator	Beneficiary	Account Type	Beneficiary Name	Beneficiary Address	Beneficiary City	Beneficiary State	Beneficiary Country	Transaction Amount	Currency	Transaction Reference
EFTR	2012-08-01	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA	ROYAL BANK OF CANADA 180 WELLINGTON STREET TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 15TH FLOOR 123 FRONT STREET TORONTO, ON M5J 2M3 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA		1,000,000.00	CAD	REF INCREASE CRA 39500616 V21026937
EFTR	2012-05-04	Person D VANCOUVER, BC CANADA	CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA		ROYAL BANK OF CANADA 180 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK THOMPSON BOULEVARD P O BOX N8168 NASSAU, BAHAMAS			1,040,000.00	CAD	REF INCREASE CRA 39500616 V21632189
EFTR	2012-11-30	Person D VANCOUVER, BC CANADA			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK NEW YORK	TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA		3,984,808.00	CAD	Ref new DCI investment P023758116
EFTR	2013-04-11	Person D VANCOUVER, BC CANADA	CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA		WELLS FARGO BANK 376 PARK AVENUE NEW YORK, NY 10182 USA	CANADIAN IMPERIAL BANK OF COMMERCE 690 BAY STREET SUITE 100 TORONTO, ON M5G 2M6 CANADA			00010	180,000.00	USD	REF NONE
EFTR	2013-04-29	Person D VANCOUVER, BC CANADA			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK NEW YORK	TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA		1,000,000.00	CAD	Ref Person D new DCI
EFTR	2013-05-18	Person D VANCOUVER, BC CANADA			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA	CITIBANK CANADA 123 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK NEW YORK	TORONTO DOMINION BANK 66 KING STREET W TORONTO, ON M5K 1A2 CANADA		1,000,000.00	CAD	Ref Person D new DCI investment P02 3775828

Table 4 - Electronic Funds Transfers Ordered by Person D

EFTR	Date	From	To	Amount	Bank	Branch	City	Country	Account	Balance	Category	Notes
EFTR	2013-06-06	Person D VANCOUVER, BC			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA	CITIBANK CANADA 133 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	CITIBANK NEW YORK	TORONTO DOMINION BANK 85 KING STREET W TORONTO, ON M5K 1A2 CANADA		2,043,853.09	GAD	Ref Person D. New DCI Investment - U 24202648
EFTR	2014-04-10	Person D VANCOUVER, BC			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA	CITIBANK CANADA 133 FRONT STREET SUITE 1900 TORONTO, ON M5J 2M3 CANADA	Person D	BANK OF MONTREAL 800 DE LA GAUCHETIERE SUITE 5000 MONTREAL, QC H5A 1K8 CANADA	07240	148,000.00	GAD	
			CITIBANK 1 COURT SQUARE FLOOR 23 LONG ISLAND, NY 11120 USA		ROYAL BANK OF CANADA 160 WELLINGTON STREET WEST TORONTO, ON M5J 1J1 CANADA	BANK OF MONTREAL 800 DE LA GAUCHETIERE SUITE 5000 MONTREAL, QC H5A 1K8 CANADA	Person D CHINA					

Table 3 - Electronic Funds Transfers Ordered to the Benefit of Person D

EFTR	2010-01-26	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG		BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010 9297782	999,982.00	USD	/RFB/ORD10012522// B/O: YING LIU 432622198310159249	
EFTR	2010-01-27	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG		BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,200,982.00	USD	/RFB/ORD10012522// B/O: YING LIU 432622198310159249	
EFTR	2010-01-27	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG		BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,399,982.00	USD	/RFB/ORD10012522// B/O: YING LIU 432622198310159249	
EFTR	2010-01-27	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG		BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,999,982.00	USD	/RFB/ORD10012522// B/O: YING LIU 432622198310159249	
EFTR	2010-01-28	HUANG BONGBO DATE OF BIRTH	BANK OF CHINA (HONG KONG) LIMITED 11 HUI FAI ROAD WEST KOWLOON BANK OF CHINA CENTER FLOOR 19, OLYMPIAN CITY HONG KONG		DEUTSCHE BANK TRUST COMPANY AMERICAN 60 WALL STREET NEW YORK, NY 10054 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	399,982.00	USD	RECOMMERCE PLACE 8840 BURRARD ST VANCOUVER BC	
EFTR	2010-01-28	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG		BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,499,982.00	USD	/RFB/ORD10013312// B/O: YING LIU 432622198310159249	
EFTR	2010-01-28	HING WAH CHINA + HK RENMINBI SHOP D Q/F CHAMPION BLDG 287-291 HONG KONG			WING LUNG BANK LTD. 46 DES VOEUX ROAD CENTRAL HONG KONG	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,000,000.00	USD		
EFTR	2010-01-28	KINGSON CO FLAT B 22/F UNIONWAY COMM CENTRE 283 QUEEN'S ROAD C HONG KONG	OCBC WING HANG BANK LIMITED 161 QUEEN'S ROAD, CENTRAL 999077 HONG KONG	29	BANK OF AMERICA 232 BROADWAY NEW YORK, NY 10038 USA	CANADIAN IMPERIAL BANK OF COMMERCE 555 BAY STREET SUITE 700 TORONTO, ON M5G 2M8 CANADA	Person D VANCOUVER, BC CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 400 BURRARD ST VANCOUVER, BC V6C 3A8 CANADA	00010	1,999,982.00	USD	/RFB/ORD10013904// B/O: YING LIU 432622198310159249	

Table 6 - Electronic Funds Transfers Ordered to the Benefit of Person D

Transaction Type	Transaction Date	Originator	Beneficiary	Amount	Currency	Transaction ID	Transaction Description	Transaction Amount	Currency	Transaction ID	Transaction Description	Transaction Amount	Currency	Transaction ID	Transaction Description
EFT	2010-01-20	SUNSHINE CO RM 228 UNIONWAY COML CTR 283 QUEEN'S RD CENTRAL HONG KONG	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTERFLOOR 19, OLYMPIAN CITY HONG KONG	1,182,980.00	USD	00010	RECOMMENCE PLACE BR BR NO 00010400 BURRARD ST VANCOUVER BC CANADA	1,182,980.00	USD	00010	RECOMMENCE PLACE BR BR NO 00010400 BURRARD ST VANCOUVER BC CANADA	1,182,980.00	USD	00010	RECOMMENCE PLACE BR BR NO 00010400 BURRARD ST VANCOUVER BC CANADA
EFT	2010-01-26	SUNSHINE CO RM 228 UNIONWAY COML CTR 283 QUEEN'S RD CENTRAL HONG KONG	BANK OF CHINA (HONG KONG) LTD. SETTLEMENT DIVISION 24/F BANK OF CHINA CENTER OLYMPIAN CITY 1, 11 HOI FAI ROAD	1,000,000.00	USD	00010	ACCOMMERCE PLACE BR BR 00010 400 BURRARD ST VANCOUVER BC /CHARGES DEDUCTED IN BANK OF CHINA NEW YORK, NEW YORK	1,000,000.00	USD	00010	ACCOMMERCE PLACE BR BR 00010 400 BURRARD ST VANCOUVER BC /CHARGES DEDUCTED IN BANK OF CHINA NEW YORK, NEW YORK	1,000,000.00	USD	00010	ACCOMMERCE PLACE BR BR 00010 400 BURRARD ST VANCOUVER BC /CHARGES DEDUCTED IN BANK OF CHINA NEW YORK, NEW YORK
EFT/STR	2011-12-13	HING LUNG TRADING COMPANY ADD FLAT/ RM A 1/F WING FU FTY BLDG 10-14 WAN G WONG TAI ST TSUEN WAN NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTERFLOOR 19, OLYMPIAN CITY HONG KONG	300,000.00	USD	00010	CONTACTS RFB 12111213CB612345	300,000.00	USD	00010	CONTACTS RFB 12111213CB612345	300,000.00	USD	00010	CONTACTS RFB 12111213CB612345
EFT/STR	2011-12-14	FOREVER SMART TRADING LIMITED OOVIT 188UE NO. 28469382000	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTERFLOOR 19, OLYMPIAN CITY HONG KONG	1,000,000.00	CAD	00010	PAYMENT	1,000,000.00	CAD	00010	PAYMENT	1,000,000.00	CAD	00010	PAYMENT
EFT/STR	2011-12-14	HING LUNG TRADING COMPANY ADD FLAT/ RM A 1/F WING FU FTY BLDG 10-14 WAN G WONG TAI ST TSUEN WAN NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTERFLOOR 19, OLYMPIAN CITY HONG KONG	300,000.00	USD	00010	CONTACTS	300,000.00	USD	00010	CONTACTS	300,000.00	USD	00010	CONTACTS
EFT/STR	2011-12-14	HING LUNG TRADING COMPANY ADD FLAT/ RM A 1/F WING FU FTY BLDG 10-14 WAN G WONG TAI ST TSUEN WAN NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTERFLOOR 19, OLYMPIAN CITY HONG KONG	340,000.00	USD	00010	CONTACTS	340,000.00	USD	00010	CONTACTS	340,000.00	USD	00010	CONTACTS

Table 6 - Electronic Funds Transfers Ordered to the Benefit of Person D

Transaction Type	Date	From (Name/Address)	To (Name/Address)	Amount	Currency	Reference	Comments
EFTR/BTR	2011-12-14	HONG KONG WANG HING LUNG TRADING CO ADD RM A8 26/F BLK A TSEI WAI GARDEN N BHATIN NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTER FLOOR 19, OLYMPIAN CITY HONG KONG HONG KONG	340,780.00	USD	CONTACTS	
EFTR/BTR	2011-12-15	ZHONG SHENG INVESTMENT DEVELOPMENT COMPANY ADD. NO. 1 PAK SHA TSUEN KUNG UM RD YUEN LONG NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTER FLOOR 19, OLYMPIAN CITY HONG KONG	2,000,000.00	CAD	PAYMENT	
EFTR/BTR	2011-12-15	ZHONG SHENG INVESTMENT DEVELOPMENT COMPANY ADD. NO. 1 PAK SHA TSUEN KUNG UM RD YUEN LONG NT	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTER FLOOR 19, OLYMPIAN CITY HONG KONG	668,985.63	CAD	PAYMENT	
EFTR/BTR	2011-12-16	FOREVER SMART TRADING LIMITED GOVT ISSUE NO: M466382000	BANK OF CHINA (HONG KONG) LIMITED 11 HOI FAI ROAD WEST KOWLOON BANK OF CHINA CENTER FLOOR 19, OLYMPIAN CITY HONG KONG	1,030,000.00	CAD	PAYMENT	
EFTR/BTR	2011-12-16	HING LUNG TRADING COMPANY ADD FLAT/ RM A 1/F WING FU FTY BLDG 10-14 WAN G WU TSAI ST TSUEN WAN NT	BANK OF CHINA (HONG KONG) LTD. SETTLEMENT DIVISION 24/F BANK OF CHINA CENTER OLYMPIAN CITY 1 11 HOI FAI ROAD	309,980.00	USD	/RFB/11216M380007 300 CONTACTS	INBANKCHUB33REC/ACCT CHARGES DEDUCTED
EFTR/BTR	2011-12-16	HING LUNG TRADING COMPANY ADD FLAT/ RM A 1/F WING FU FTY BLDG 10-14 WAN G WU TSAI ST TSUEN WAN NT	BANK OF CHINA (HONG KONG) LTD. SETTLEMENT DIVISION 24/F BANK OF CHINA CENTER OLYMPIAN CITY 1 11 HOI FAI ROAD	289,980.00	USD	CONTACTS /RFB/11216M380007 400	RECHARGES DEDUCTED IN SC0320BA NK OF CHINA US-NEW YORK 10017

Table 4 - Electronic Funds Transfers Ordered to the Benefit of Person D

EFTR	Date	Company A	Company B	Company C	Company D	Company E	Company F	Company G	Company H	Company I	Company J	Company K	Company L
EFTR	2012-09-12	Company A EAST BAY STREET NASSAU, BAHAMAS N7757			UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	UBS AG STAMFORD BRANCH 6277 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	Person D	CITIBANK 153 EAST 53RD STREET NEW YORK, NY 10043 USA		\$,100,000.00	USD	ATTN: KEVIN LAU, CPB	
*Transaction amount is not counted in table or disclosure totals, as this transaction is available in Table 3													

Table 6 - Electronic Funds Transfers Ordered by or to the Benefit of Company A

EFTR	2010-05-07	SHANGHAI MILLION INTERNATIONAL TRADE CO. LTD. ROOM 710 NO. 180 HUABEN RD SHANGHAI CHINA	INDUSTRIAL BANK CO. LTD. NO. 117 EAST BEIJING ROAD SHANGHAI 200002 CHINA		UBS AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	Company A			2,040,885.00	USD	FOR 00008 15.00 FEE DEDUCTED /RFB/211680R100001619	INBCP00008BANK OF AMERICA, N.A. US-NEW YORK 10001
EFTR	2010-06-10	BUN CENTURY INTERNATIONAL LIMITED P.O. BOX 2182 ROAD TOWN TORTOLA, BRITISH VIRGIN ISLANDS			DEUTSCHE BANK TRUST COMPANY AMERICAS 50 WALL STREET NEW YORK, NY 10004 USA	UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	Company A			437,961.00	USD	/RFB/00000000711FOR 00008	INBUCBCHNBH
EFTR	2010-06-11	SHANGHAI MILLION INTERNATIONAL TRADE CO. LTD. NO. 895 YANAN RD SHANGHAI CHINA	HUA XIA BANK 6 ZHONG SHAN DONG YI ROAD FLOOR 2 SHANGHAI 200002 CHINA		UBS AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	Company A			16,744,995.00	USD	/RFB/000000008	INBCP00002JPMORGAN CHASE BANK, N.A. US-NEW YORK 10004
EFTR	2010-08-12	SHANGHAI JU CHENG INTERNATIONAL TRADE CO. LTD. NO. 703 HUABEN RD SHANGHAI, CHINA	HUA XIA BANK 6 ZHONG SHAN DONG YI ROAD FLOOR 2 SHANGHAI 200002 CHINA		CITIBANK 111 WALL STREET NEW YORK, NY 10043 USA	UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	Company A			6,056,986.00	USD	/RFB/000000008 LESS CHARGES	INBHBKCNBJXX
EFTR	2010-06-13	SHANGHAI JU CHENG INTERNATIONAL TRADE CO. LTD. NO. 160 HUABEN RD SHANGHAI CHINA	HUA XIA BANK 6 ZHONG SHAN DONG YI ROAD FLOOR 2 SHANGHAI 200002 CHINA		UBS AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	Company A			4,218,729.50	USD	/RFB/000000008	INBCP00002JPMORGAN CHASE BANK, N.A. US-NEW YORK 10004
EFTR	2011-07-28	Company A Company A EAST BAY STREET NASSAU, BAHAMAS N7757			UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	UBS AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT USA	UBS TRUSTEES (BAHAMAS) LTD EAST BAY STREET PO BOX N-7757 NASSAU, BAHAMAS	UBS (BAHAMAS) LTD		30,000.00	USD	ATTN: HERVIEA BAIN INVOICE NUMBER: IV - 90740	
EFTR	2012-06-07	Company A Company A EAST BAY STREET NASSAU, BAHAMAS N7757			UBS BANK (CANADA) 164 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	UBS AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT USA	UBS TRUSTEES (BAHAMAS) LTD EAST BAY STREET PO BOX N-7757 NASSAU, BAHAMAS	UBS (BAHAMAS) LTD		19,529.39	USD	ATTN: HERVIEA BAIN INVOICE NO. 104252	
EFTR	2014-11-28	Company A Company A EAST BAY STREET NASSAU, BAHAMAS N7757	CANADIAN IMPERIAL BANK OF COMMERCE 899 BAY STREET SUITE 100 TORONTO, ON M5G 2M8 CANADA		CANADIAN IMPERIAL BANK OF COMMERCE 899 BAY STREET SUITE 100 TORONTO, ON M5G 2M8 CANADA	CIBC TRUST COMPANY (BAHAMAS) LTD WEST BAY STREET NASSAU, BAHAMAS	Company A			20,000.00	USD	Company A	

Table 7 - Cash Deposits Conducted by Person B

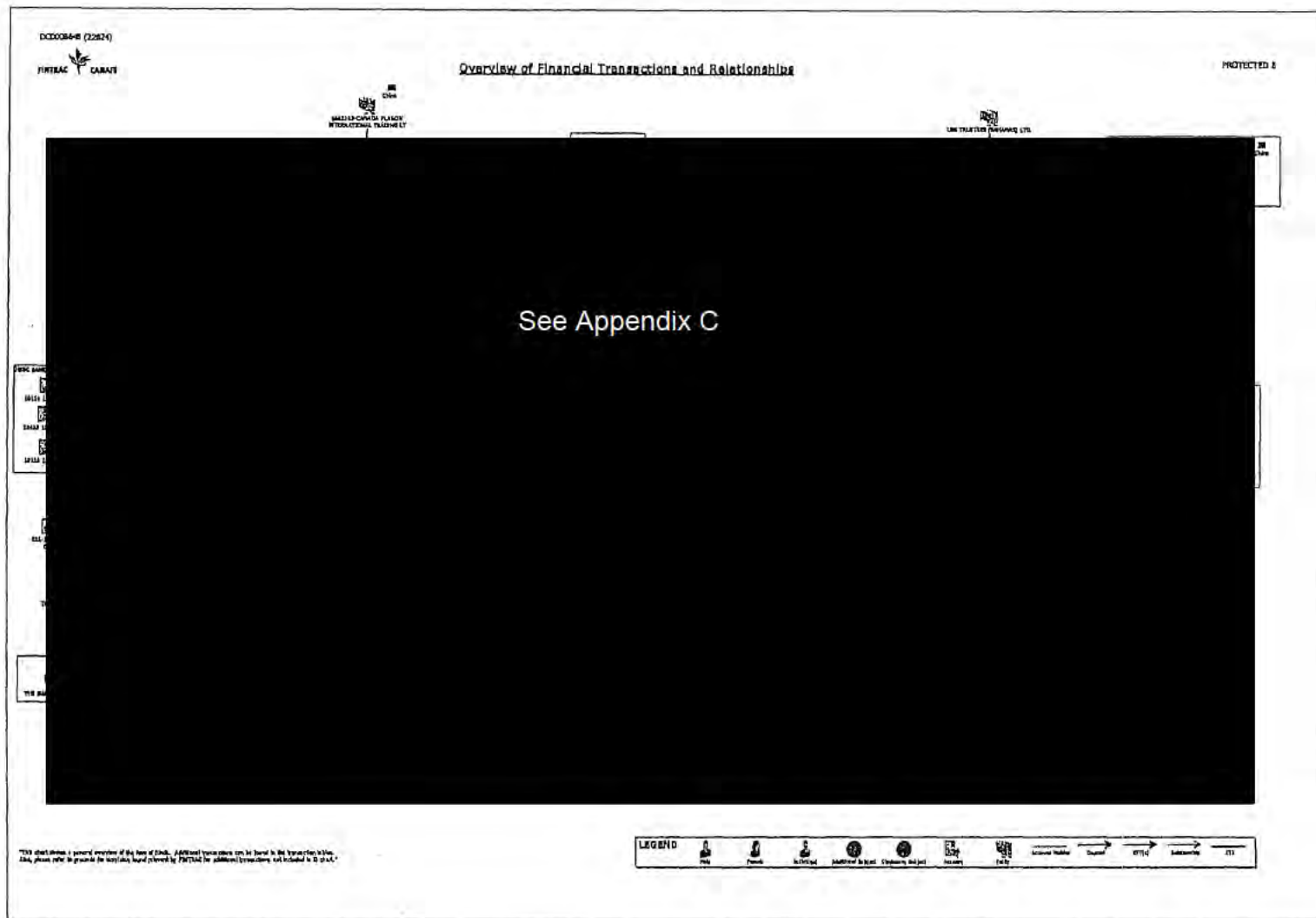
LCYR	DATE	BANK	ADDRESS	PERSON	ACCOUNT	CURRENCY	PERSONALITY	OCCUPATION	PASSPORT	DEPOSIT	CASH	AMOUNT	CURRENCY
LCYR	2006-04-30	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B	10110	PERSONAL CAD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	46,000.00	CAD
LCYR	2006-10-07	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B	10110	PERSONAL CAD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	10,000.00	CAD
LCYR	2006-10-07	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B	10110	PERSONAL CAD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	10,000.00	CAD
LCYR	2009-10-07	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B	10110	PERSONAL CAD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	20,000.00	USD
LCYR	2007-11-01	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B Person A	10110	PERSONAL USD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	60,000.00	USD
LCYR	2007-11-01	HSBC BANK CANADA	2164 WEST 41ST AVENUE VANCOUVER, BC V6M 1Z1 CANADA	Person B Person A	10110	PERSONAL HKD	Person B VANCOUVER, BC CANADA	HOMEMAKER	PASSPORT CHINA	DEPOSIT	CASH	100,000.00	HKD

Table 4 - Electronic Funds Transfers Ordered by Person B

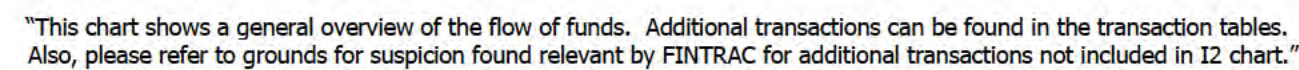
EFTR	2005-11-01	Person B					DEUTSCHE BANK (SU1888) 3 PLACE DES BERGUES GENEVA 1211 SWITZERLAND	H88C BANK CANADA 10 YORK STREET SUITE 500 TORONTO, ON M5J 1B4 CANADA	Person B		H88C BANK CANADA VANCOUVER, BC VEN 121 CANADA	10110	200,000.00	USD	-
EFTR	2007-04-03	Person B					DEUTSCHE BANK (SU1888) 3 PLACE DES BERGUES GENEVA 1211 SWITZERLAND	H88C BANK CANADA 10 YORK STREET SUITE 500 TORONTO, ON M5J 1B4 CANADA	Person B		H88C BANK CANADA 180 BLOOR ST W SUITE 1100 TORONTO, ON M5S 1Y5 CANADA	10110	800,000.00	USD	-
EFTR	2007-11-21	Person B HARJIAN DISTRICT BEIJING, CHINA					DEUTSCHE BANK (SU1888) 3 PLACE DES BERGUES GENEVA 1211 SWITZERLAND	H88C BANK CANADA 10 YORK STREET SUITE 500 TORONTO, ON M5J 1B4 CANADA	Person A, Person B		H88C BANK CANADA 180 BLOOR ST W SUITE 1100 TORONTO, ON M5S 1Y5 CANADA	10110	3,000,000.00	USD	-
EFTR	2008-05-29	Person B VANCOUVER, BC CANADA	DOB: [REDACTED] UNEMPLOYMENT				WEN CHENG BAO SHAN LU 78 SHANGHAI 200000 CHINA	CANADA MONEY TT LIMITED 1231-4800 KINGWAY AVE BURNABY, BC V3H 2A8 CANADA	Person B				1,000,000.00	USD	-
EFTR	2008-07-08	Person B VANCOUVER, BC CANADA	DOB: [REDACTED] CEO				PIAO YUAN YANG PUQU KHAO XING 15 JIAO SHANGHAI 200000 CHINA	CANADA MONEY TT LIMITED 1231-4800 KINGWAY AVE BURNABY, BC V3H 2A8 CANADA	Person B				17,886.74	CAD	-
EFTR	2010-01-12	Person B VANCOUVER, BC CANADA					USB BANK (CANADA) 184 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	USB AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	AMERICAN WEMPE CORP 700 8TH AVENUE NEW YORK, NY		JP MORGAN CHASE BANK 410 PARK AVENUE NEW YORK, NY 10022 USA		88,000.00	USD	-
EFTR	2011-12-19	Person B VANCOUVER, BC CANADA					USB BANK (CANADA) 184 UNIVERSITY AVENUE TORONTO, ON M5H 3Z4 CANADA	USB AG STAMFORD BRANCH 877 WASHINGTON BOULEVARD STAMFORD, CT 06901 USA	TOURNEAU LLC		JP MORGAN CHASE 1 CHASE MANHATTAN PLAZA NEW YORK, NY 10058 USA		27,486.88	USD	RE: Person A. GORUM WATSON RUMCLUM, HI
EFTR	2013-01-10	Person B VANCOUVER, BC CANADA				CANADIAN IMPERIAL BANK OF COMMERCE 896 BAY STREET SUITE 700 TORONTO, ON M5G 2M4 CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 896 BAY STREET SUITE 700 TORONTO, ON M5G 2M4 CANADA	WELLS FARGO BANK 375 PARK AVENUE NEW YORK, NY 10162 USA	THE SWATCH GROUP US 375 390 PARK AVE NEW YORK, NY 10043 USA		CITIBANK 390 PARK AVE NEW YORK, NY 10043 USA		158,800.00	USD	-
EFTR	2013-01-10	Person B VANCOUVER, BC CANADA				CANADIAN IMPERIAL BANK OF COMMERCE 896 BAY STREET SUITE 700 TORONTO, ON M5G 2M4 CANADA	CANADIAN IMPERIAL BANK OF COMMERCE 896 BAY STREET SUITE 700 TORONTO, ON M5G 2M4 CANADA	WELLS FARGO BANK 375 PARK AVENUE NEW YORK, NY 10162 USA	POMELLATO 741 MADISON AVENUE CORP 150 EAST 64TH STREET 14TH FL NEW YORK, NY 10022 USA		CITIBANK 390 PARK AVE NEW YORK, NY 10043 USA		32,000.00	USD	-
EFTR	2014-04-23	Person B VANCOUVER, BC CANADA					DEUTSCHE BANK AG ONE RAFFLES QUAY SOUTH 041863 SINGAPORE	BANK OF MONTREAL 800 DE LA GAUCHETIERE SUITE 8000 MONTREAL, QC H3A 1K8 CANADA	Person G CHINA		BANK OF MONTREAL 800 DE LA GAUCHETIERE SUITE 8000 MONTREAL, QC H3A 1K8 CANADA		1,190,000.00	USD	-

Table B - Electronic Funds Transfers Ordered by Person B

EFTR	2014-07-29	Person B [REDACTED] VANCOUVER, BC [REDACTED] CANADA		CANADIAN IMPERIAL BANK OF COMMERCE 894 BAY STREET SUITE 700 TORONTO, ON M5G 1M8 CANADA	[REDACTED]	CANADIAN IMPERIAL BANK OF COMMERCE 894 BAY STREET SUITE 700 TORONTO, ON M5G 1M8 CANADA	BARCLAYS BANK PLC 1 CHURCHILL PLACE LONDON EC4A 3DF UNITED KINGDOM	CITIBANK NA PBO NASSAU 110 THOMPSON BLVD NASSAU PARADISE ISLAND BAHAMAS	CITIBANK 55 CANADA SQUARE LONDON E14 6LB UNITED KINGDOM	[REDACTED]	250,100.00	EUR	FFC TO Person D, A/C NEW EURO ASSET ATTH KEVIN LAURIN WH RES A/C 385218111 PLS KEEP IN SUIRO ACCOUNT
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APPENDIX C



APPENDIX D

1 INTRODUCTION: ORDERING PARTIES FOR PAYMENTS INTO CANADA

The FINTRAC Report lists three companies and one individual as the ordering parties for the USD 14,389,752 remitted to Ms. **Person D** in January 2010, as shown in the table below.¹ The FINTRAC records do not contain other references to any of these parties, and they are not mentioned elsewhere in the Application Record.

<u>Ordering Party</u>	<u>Total Amount</u>	<u>No. of Transactions</u>
Kingson Co.	USD 9,199,892	6
Sunning Co.	USD 3,189,960	2
Hing Wah China + HK Renminbi	USD 1,600,000	1
Huang Songbo	USD 399,980	1

Available information on these four ordering parties is summarized below.

2 ORDERING PARTIES FROM THE FINTRAC REPORT

Sections 5 and 6 refer to two groups of payments made into **Person D**'s UBS Canada bank account in January 2010 and December 2011, summarized and tabulated below²:

Dates	Ordering Party	Total Amount	No. of Transactions	Total Amount for the Period
2010-01-26 to 2010-01-29	Kingson Co.	USD 9,199,892	6	USD 14,389,832 (RMB 98.3 million)
	Sunning Co.	USD 3,189,960	2	
	Hing Wah China + HK Renminbi	USD 1,600,000	1	
	Huang Songbo	USD 399,980	1	
2011-12-13 to 2011-12-16	Zhong Sheng Investment Development Company	CAD 2,999,989	2	USD 13,229,244 and CAD 5,029,989 (RMB 43.9 million)
	Forever Smart Trading Limited	CAD 2,030,000	2	
	Hing Lung Trading Company	USD 1,749,900	5	
	Hong Kong Wang Hing Lung Trading Co.	USD 349,980	1	

This Appendix presents publicly available information and information found in the Application Record regarding the ordering parties.

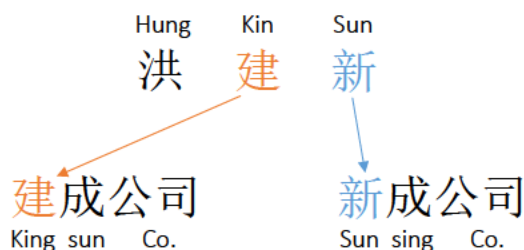
¹ FINTRAC Report, Appendix B, p. 403-405

² FINTRAC Report, Appendix B, p. 403-405

3 KINGSON CO. AND SUNSING CO.

The majority of the money sent to "D" in January 2010, USD 12,389,852 of USD 14,389,832, was remitted by Kingson Co. and Sunsing Co. The FINTRAC Report lists both at the same address: Flat B, 22/F, Unionway Comm Centre, 283 Queen's Road Central.³ Almost no information about these firms is available online, but their names both appeared on a 2012 list (the "2012 RAMC List") of "remittance agents and money changers" ("RAMCs") disclosed by the Hong Kong government's Joint Financial Intelligence Unit ("JFIU"), an anti-money-laundering organization run by the Hong Kong police and the Customs & Excise Department.⁴

The 2012 RAMC List provides the same address as the FINTRAC Report and lists Chinese names for Kingson Co. and Sunsing Co.: 建成公司 and 新成公司, respectively. It also lists two individuals licensed as RAMCs at the same address: Hung Kin-sun (洪建新) and Lam Ling-ling (林玲玲). The Chinese names "Kingsun" and "Sunsing" each consist of one of the two characters of Hung's given name plus the character 成 (pronounced "sing" in Cantonese), meaning (among other things) "accomplishment":



Hong Kong property records show that the two purchased a flat on Hong Kong Island in 2007 for HKD 3,880,000 (roughly CAD 536,000 at the time), a modest price by Hong Kong standards.⁵ Publicly available records of the purchase⁶ contain their ID numbers, and the HKCR Database identified no companies whose current directors have these ID numbers.⁷

Kingsun and Sunsing are not currently listed as RAMCs on a database maintained by the JFIU (the "RAMC Database")⁸ and do not appear in a comprehensive database of live and dissolved companies maintained by the Hong Kong Companies Registry (the "HKCR Database").⁹ The RAMC Database allows corporate and individual RAMCs to use "trading as" names that differ from their legal names.¹⁰

³ FINTRAC Report, Appendix B, p. 403-404

⁴ The document was uploaded to a document-hosting website by a user named "jfiu.gov.hk." On 2012-04-01, HK revised its "Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance." The day before (2012-03-31), the JFIU published a list of RAMCs (remittance agents and money changers) registered prior to the enactment of the amended law, which were deemed to be granted a 60-day license to operate under the newly amended law to give them time to submit new documents. However, while the JFIU's website still offers the document for download, it is now a depopulated PDF with no entities listed. The list found online, dated March 15 rather than March 31, may be an early draft of this: the title and format of the two documents are identical. C f. www.yumpu.com/en/document/read/8457345/remittance-agent-register. A backup of the link has been created at

<https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>.

⁵ <https://www.cnn.com/2019/04/12/hong-kong-average-house-price-hits-1point2-million.html>

⁶ Available at the Hong Kong Land Registry's Integrated Registration Information System Online Services portal (<https://www1.iris.gov.hk/eservices/welcome.jsp>)

⁷ <https://www.icris.cr.gov.hk/>

⁸ <https://eservices.customs.gov.hk/MSOS/wsrh/001s1>

⁹ <https://www.icris.cr.gov.hk/>

¹⁰ For example: "Fang Si Qi Ivan Trading as Hing Wah China and HK Renminbi Exchange Co"

4 HING WAH CHINA + HK RENMINBI AND FOREVER SMART TRADING LIMITED

4.1 Forever Smart

Forever Smart Trading Limited (永杰貿易有限公司) (“Forever Smart”) remitted CAD 2,030,000 to “D” Person D in December 2011.¹¹ The HKCR Database shows that Forever Smart was established several months before the transactions, in June of 2011 year, and was dissolved in March 2013.¹² Its owner and sole director was a man named Fang Jinghua (方靜華). In the only annual report filed by Forever Smart (issued February 2012), Fang is listed as a mainland Chinese resident with an address in Shenzhen and a PRC ID number,¹³ which shows that he was born in 1968.

Forever Smart has essentially no online profile, and no evidence of its business activities was found in the public record.

4.2 Hing Wah China + HK Renminbi

According to the FINTRAC Report, an ordering party named “Hing Wah China + HK Renminbi” made a USD 1.6 million remittance to Person D on 2011-01-26. Its address in the records is given as Shop C, G/F, Champion Building, 287-291 Des Voeux Road Central, Hong Kong.¹⁴

The 2012 RAMC List contains an entry for a RAMC at the same address with a nearly identical English name: Hing Wah China and HK Renminbi (興華人民幣找換公司) (“Hing Wah”). Hing Wah is listed in the entry as the “trading as” name for a person named Fang Jinghua (方靜華), using the same Chinese characters as the Fang Jinghua associated with Forever Smart.¹⁵ That entry remained in the RAMC Database as of 2020-06-10, but as of 2021-03-10, Fang Jinghua’s name has been replaced by Fang Si Qi Ivan (方思淇) (“Ivan Fang”).¹⁶

2020-06-10	FANG JING HUA TRADING AS HING WAH CHINA AND HK RENMINBI EXCHANGE CO 方靜華 營業名稱 興華人民幣找換公司	SHOP C, G/F, CHAMPION BUILDING, 287-291 DES VOEUX ROAD CENTRAL, CENTRAL, HONG KONG	Specified Premises
2021-03-10	FANG SI QI IVAN TRADING AS HING WAH CURRENCY EXCHANGE CO 方思淇 營業名稱 興華找換公司	SHOP C2, G/F, CHAMPION BUILDING, 287-291 DES VOEUX ROAD CENTRAL, SHEUNG WAN, HONG KONG (Branch Name : HING WAH CURRENCY EXCHANGE CO) (分行名稱 : 興華找換公司)	Specified Premises

Figure 1

Google Maps shows the following storefront at Hing Wah’s address. The Chinese characters over the storefront in the image below read “Hing Wah Currency Exchange.”

¹¹ FINTRAC Report, Appendix B, pp. 404-405

¹² There have been at least four companies in Hong Kong named Forever Smart Trading Limited. The first three of these were incorporated in sequence, existing from 2004 to 2006, then 2006 to April 2011, and from June 2011 to March 2013. The fourth was not incorporated until 2017, and was dissolved around a year later. The companies all had different shareholders and officers, and only the first two had the same Chinese name (恒駿貿易有限公司).

¹³ Address: Rm. B1-3-503, BuJi YangGuang HuaYuan, LongGang District, Shenzhen.

¹⁴ FINTRAC Report, Appendix B, p. 403

¹⁵ [www.yumpu.com/en/document/read/8457345/remittance-agent-register](https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register) (archived at <https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>)

¹⁶ <https://eservices.customs.gov.hk/MSOS/wsrh/001s1>



Figure 2

The HKCR Database contains no record of a company in Hong Kong named “Hing Wah China and HK Renminbi Exchange Co.,” but it does show that Fang Jinghua is a shareholder of a company named Hing Wah Investment Industries Co. Ltd. (興華投資實業有限公司) (“Hing Wah Investment”), which was established in June 2011, the same month as Forever Smart Trading, and continues to exist.¹⁷ In its first annual report, filed in June 2013, Fang Jinghua was listed with a Hong Kong ID rather than a mainland Chinese ID number. His address in the records is at an upscale residential development on Hong Kong Island.¹⁸ Currently, Ivan Fang is also listed as a shareholder.¹⁹

According to Tolfin, a proprietary database that aggregates Hong Kong court records, both Fang Jinghua and Ivan Fang have been charged with crimes in Hong Kong. In 2018, Fang Jinghua was charged with “criminal damage.”²⁰ In August 2016, Ivan Fang was charged with assaulting a police officer.²¹

In 2019, a mainland Chinese man named Xie Shili (谢世立) accused Fang Jinghua and Hing Wah of being an “underground bank” (地下钱庄), using the same Chinese phrase employed in the [REDACTED] to describe Fang Xiwu and Fang Jianhong. The accusation was not presented in detail, but was an incidental part of a complex contract dispute between Xie and a former business partner, which involved transfers of money between Hong Kong and mainland China. Xie claimed that Hing Wah had used accounts belonging to eight different employees²² to make currency exchanges far in excess of what was permitted by Chinese law. A Chinese court ruled that the transfers were legal.²³

In an affidavit filed with the Chinese court in relation to the dispute, Fang Jinghua wrote that he was the operator of Hing Wah China and HK Renminbi Exchange Co., and had founded the business in 1993.

¹⁷ <https://www.icris.cr.gov.hk/>

¹⁹ Hing Wah’s 2018 annual report, retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>)

²⁰ Case no. ESCC1642/2018

²¹ Case no. ESCC2452/2016

²² The eight names are rendered in Mandarin unless otherwise noted: Li Fengying (黎风滢), Chen Jixin (陈继新), Fong Pui Chung (方培聪; English name given in Cantonese and discussed below), Lu Shaoqin (卢少琴), Ye Chunrong (叶春容), Huang Zejia (黄泽嘉), Huo Jianmin (霍健民), and Liu Huifang (刘惠芳)

²³ <https://xw.qq.com/cmsid/20190805A084C000> (archived at <https://archive.ph/ADhFY#selection-651.4-651.7>)

4.2.1 Jewellery Shops

Aside from Fang Jinghua and Ivan Fang, Hing Wah Investment's corporate filings list four other shareholders and directors, of which three are named Fang or Fong (both written using the same Chinese character: 方).²⁴ The fourth is a woman named Huang Shao Hua (黃少華), whose English name is rendered using Mandarin pronunciation,²⁵ as is common for mainland Chinese and uncommon for those born in Hong Kong. In Hing Wah Investments' 2012 annual report, all the shareholders are listed at the same address.²⁶

These five Fang/Fongs and Huang (the "Fang Family") are connected to a large number of companies in Hong Kong as both shareholders and directors. Many of these businesses are obscure, with little or no information about their operations available online, but four are jewelry shops.²⁷ The US State Department, Hong Kong media, and other sources have reported that jewelry retail is often used in money laundering operations in Asia.²⁸

A man named Fong Siu Lok (方少樂) ("Fong") is a shareholder of some of these jewelry shops,²⁹ and in 2012 was also licensed as an RAMC at the same address as Hing Wah³⁰ (though is not listed at the same residential address as Fang Jinghua et al.). More on this individual is presented below.

One of these shops, Koon Fook Jewellery Gold Ltd. (冠福珠寶金行有限公司) ("Koon Fook"), also appears in the RAMC Database.³¹

	Name of Licensee	Address	Address Type
1	WONG WAI NOK GARY TRADING AS KOON FOOK CURRENCY EXCHANGE CO 黃偉諾 營業名稱 冠福人民幣外幣兌換 公司	SHOP 30A, G/F, WAH CHEUNG BUILDING, 30 CHUEN LUNG STREET, TSUEN WAN, NEW TERRITORIES	Specified Premises

Figure 3

²⁴ Mr. Fang Ju Cheng (方鉅成); Mr. Fong Pui Chung (方培聰); and Ms. Fang Hui Yu (方慧鈺)

²⁵ According to Hing Wah Investment's 2015 annual report, on 2015-07-16 Huang changed her legal name. She both changed her Chinese characters, and used Cantonese to render those characters into English. She is now known as Wong Lai Wah (黃麗樺), which in Mandarin would be pronounced Huang Li Hua. The annual report was retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

²⁶ The annual report was retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

²⁷ According to the annual reports of the companies, retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>): Koon Fook Jewellery Gold Ltd.; Koon Fook Jewellery Group Ltd. (冠福珠寶集團有限公司); Lok Shing Jewellery Company Ltd. (樂誠珠寶金行有限公司); and Tim Fook Jewellery & Gold Co. Ltd. (添福珠寶金行有限公司). Koon Fook Jewellery Gold Ltd. (冠福珠寶金行有限公司) is also registered as a RAMC, according to the RAMC Database (<https://eservices.customs.gov.hk/MSOS/wsrh/001s1>). It is registered as a "trading as" name for a licensed RAMC named Gary Wong Wai Nok (黃偉諾).

²⁸ <https://2009-2017.state.gov/j/inl/rls/nrcrpt/1999/928.htm>

<https://www.scmp.com/magazines/post-magazine/article/2008803/highs-and-lows-hong-kongs-diamond-trade>

<https://sanctionsanner.com/blog/money-laundering-in-the-jewelry-business-278>

²⁹ C.f. the 2017 annual report of Koon Fook Jewellery Gold Ltd. (冠福珠寶金行有限公司) and 2018 annual report of Lok Shing Jewellery Company Ltd. (樂誠珠寶金行有限公司). The reports were retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

³⁰ www.yumpu.com/en/document/read/8457345/remittance-agent-register (archived at

<https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>)

³¹ <https://eservices.customs.gov.hk/MSOS/wsrh/001s1>

Koon Fook is 34% owned by Fang Ju Cheng (方鉅成), one of the co-owners of Hing Wah Investment; and 51% owned by a man named Fong Siu Lok (方少樂) (“Fong”),³² who shares the same Chinese surname as the Fong family. Fong Siu Lok also co-owns another of the jewelry shops, Lok Shing Jewellery Company Ltd. (樂誠珠寶金行有限公司), with Fang Ju Cheng (each holds 50%).³³ The 2012 RAMC List contains an entry for Fong Siu Lok as an individual RAMC, providing addresses for him; the same list contains an entry for Hing Wah providing the same three addresses.³⁴

4.2.2 Fong Siu Lok

Fong appears in the corporate records of a Macao jewelry shop³⁵ that shares the same secretary as a junket run by Szeto Yuk Lin (“Szeto”),³⁶ a gaming tycoon widely reported to have close connections to organized crime, particularly Wan Kwok-koi, a.k.a. Broken Tooth Koi, a leader of the 14K triad.³⁷ Szeto goes by the English name Christine,³⁸ which is also the name of Fong’s jewelry shop.³⁹

Fong Siu Lok has a somewhat higher public profile than other Fang Family members. He became head of the Hong Kong Lion’s Club in 2017,⁴⁰ and in 2011 and 2012 was one of Hong Kong’s delegates to the Chinese People’s Political Consultative Congress (“CPPCC”) of Fengkai, a region of Guangdong just north of Hong Kong. Public records reveal several notable associations:

- Fong is listed as one of the “administrators” of a Macao jewellery shop named Christine Jewellery City Limited (Portuguese: Cidade De Joalharia Christine; Chinese: 姬莉亞珠寶城一人有限公司) (“Christine Jewellery”).⁴¹ The other administrator is a woman named Fu Cheng Wai (富靜偉).

Fu Cheng Wai is also listed as the secretary of a Macanese junket named Joy Wave Diamond – Gaming Promotion Co. Limited. (樂濤鑽石博彩中介人一人有限公司), which is run by “Christine”⁴² Szeto Yuk Lin (司徒玉蓮) (“Szeto”), according to Macanese corporate records. Szeto is a gaming tycoon sometimes referred to as the “big sister” of Macao’s gambling world,⁴³ and has been photographed alongside some of Macao’s most important gaming and organized-

³² According to its 2018 annual report, retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

³³ According to its 2018 annual report, retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

³⁴ Addresses: (1) G/F, 252 Sha Tsui Road, Tsuen Wan; (2) G/F, Bowring Building, 8-20 Bowring Street, Jordan, Kowloon; (3) Shop A2, G/F, No. 28 Chuen Lung Street, Tsuen Wan, New Territories.

2012 RAMC List: www.yumpu.com/en/document/read/8457345/remittance-agent-register (archived at <https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>)

³⁵ Christine Jewellery City Limited (Portuguese: Cidade De Joalharia Christine; Chinese: 姬莉亞珠寶城一人有限公司), according to Macao corporate records obtained from the Macao Companies Registry.

³⁶ Joy Wave Diamond – Gaming Promotion Co. Limited. (樂濤鑽石博彩中介人一人有限公司), according to Macao Companies Registry.

³⁷ https://gamblingcompliance.com/premium-content/insights_analysis/broken-tooth-opens-vip-club-sjm-casino (archived at <https://archive.ph/qwuKB>)

<https://kknews.cc/story/pgvryrj.html>

<https://read01.com/BJaKkj3.html#.YErRCmiQGUK>

https://www.luoow.com/dc_tw/109152207

³⁸ <https://www.scmp.com/article/512428/lai-see>

³⁹ Christine Jewellery City Limited

⁴⁰ https://www.lionsclubs.org/hk/assets/magazine/Lions_Maz_Jul_Aug_2017_Lowres.pdf

⁴¹ Confirmed to be the same person by address: Fong Siu Lok’s address appears in the 2019 annual report of East Rich Inc. Limited (of which he a shareholder) as Flat 1E, Tower 26, Parc Oasis, Kowloon Tong, Kowloon. The same address appears in the Macanese records for Christine Jewellery. Those records were obtained by sending an agent to the Macao Companies Registry.

⁴² <https://www.scmp.com/article/512428/lai-see>

⁴³ <https://www.scmp.com/article/707712/macau-big-sister-one-year-bond>

crime figures.⁴⁴ She is widely reported to be “a close friend” of Wan Kuok-koi (尹國駒) (“Wan”),⁴⁵ more commonly known as Broken Tooth Koi (崩牙駒), a former leader of the notorious 14K triad. In 1997, Wan ordered a hit in Vancouver against Lai Tong Sang, an alleged leader of the rival Shui Fong triad.⁴⁶ Wan was sentenced to prison in 1999, and after being released in 2012 is alleged by the United States Treasury and others to have continued to conduct criminal activities,⁴⁷ including involvement with The Company, a drug cartel allegedly run by a Canadian national named Tse Chi Lop.⁴⁸ Szeto reportedly assisted Wan with his first venture back into gaming after his release from prison.⁴⁹

- From 2011 to 2013, Fong reportedly met repeatedly with the Hong Kong Feng Kai Clansman Association (香港封開同鄉會),⁵⁰ one of Hong Kong’s many “hometown organizations,” commonly known as Tongs (堂) in North America.

The Feng Kai Clansman Association was founded⁵¹ and headed⁵² by Mango Wong (黃桂榮) (“Mango”), who was present at all of the events attended by Fong.⁵³ Mango is currently on trial for allegedly running a USD 14.5 million investment scam.⁵⁴ He was brother of the late Sunny Wong (黃桂芬/黃進一⁵⁵) (“Sunny”), whom the Hong Kong newspaper *South China Morning Post* once described as a “Notorious convicted ... loan shark” who was once “jailed for a massive loan-sharking operation [run with his brothers] that sparked a series of crimes that left top officials in fear more than two decades ago.”⁵⁶ In 2018, Sunny fell to his death from a car park in Hong Kong shortly after being arrested for running a group alleged to have organized beatings, kidnapping, and extortion. He had been released on bail at the time, and police ruled his death a suicide. Since Sunny’s death, several of his brothers and associates, including Mango, have also been arrested for related crimes.⁵⁷

⁴⁴ <https://www.master-insight.com/%E8%B3%AD%E5%A0%B4%E3%80%8C%E5%A4%A7%E5%AE%B6%E5%A7%90%E3%80%8D%E7%9A%84%E8%87%AA%E5%82%B3/>

⁴⁵ https://gamblingcompliance.com/premium-content/insights_analysis/broken-tooth-opens-vip-club-sjm-casino (archived at <https://archive.ph/qwuKB>)

<https://kknews.cc/story/pgvryrj.html>
<https://read01.com/BJaKkj3.html#.YErRCmiQGUK>

https://www.luoow.com/dc_tw/109152207

⁴⁶ <https://www.scmp.com/news/world/article/1160428/how-macaus-gang-war-spilled-over-vancouver>

⁴⁷ <https://www.scmp.com/magazines/post-magazine/long-reads/article/3122201/what-has-former-14k-triad-boss-broken-tooth-wan>

⁴⁸ <https://www.reuters.com/article/australia-thailand-drugs-arrest/factbox-drag-net-closes-key-figures-in-the-company-drug-syndicate-idUSL4N2KB16J>

⁴⁹ https://gamblingcompliance.com/premium-content/insights_analysis/broken-tooth-opens-vip-club-sjm-casino (archived at <https://archive.ph/qwuKB>)

⁵⁰ 2011-10-22: <http://fengkai.hk/xiugui/201187.html> (archived at <https://archive.ph/jqcdB>)

2012-02-26: <http://boundlessfund.org/oldweb/web/html/donate001.html> (archived at <https://archive.ph/vDphz>)

January 2013: <http://paper.wenweipo.com/2013/01/15/zt1301150001.htm> (archived at <https://archive.ph/45TE9>)

2012-03-30: <http://www.ifengkai.net/thread-19356-1-1.html> (archived at <https://archive.ph/dpqhB>)

⁵¹ <https://www.singpao.com.hk/index.php?fi=news1&id=79402>

⁵² <http://fengkai.hk/FKToday3.html> (archived at <https://archive.ph/JcKZW>)

⁵³ 2011-10-22: <http://fengkai.hk/xiugui/201187.html> (archived at <https://archive.ph/jqcdB>)

2012-02-26: <http://boundlessfund.org/oldweb/web/html/donate001.html> (archived at <https://archive.ph/vDphz>)

January 2013: <http://paper.wenweipo.com/2013/01/15/zt1301150001.htm> (archived at <https://archive.ph/45TE9>)

2012-03-30: <http://www.ifengkai.net/thread-19356-1-1.html> (archived at <https://archive.ph/dpqhB>)

⁵⁴ https://hk.on.cc/hk/bkn/cnt/news/20201215/bkn-20201215151201391-1215_00822_001.html

⁵⁵ <https://www.singpao.com.hk/index.php?fi=news1&id=79402>

⁵⁶ <https://www.scmp.com/news/hong-kong/hong-kong-law-and-crime/article/2159962/notorious-convicted-hong-kong-loan-shark>

⁵⁷ <https://hk.news.appledaily.com/breaking/realtime/article/20180814/58564096>

<https://hk.appledaily.com/china/20200110/FMCZENY3N3NSGZ5JW6TOIBEYQ/>

<https://www.scmp.com/news/hong-kong/hong-kong-law-and-crime/article/2159962/notorious-convicted-hong-kong-loan-shark>

According to reports on the trial, the main entity through which Mango allegedly perpetrated his alleged loan fraud was named Intell Finance and Mortgage Co. Ltd. (英利財務按揭公司).⁵⁸ Fong owns a company with a similar Chinese name: East Lucky International Holding Investment Limited (英利國際控股投資有限公司) (“East Lucky”). The Chinese characters corresponding to the words “Intell” and “East Lucky” are the same (英利), pronounced “Ying Lei” in Cantonese. An recently dissolved affiliate of East Lucky,⁵⁹ East Lucky Euro Motors Limited (英利歐盟汽車有限公司), was previously involved in automotive financing.⁶⁰

- Fong currently owns 100% of East Lucky, and is one of its two directors. The other director is a man named Terry Yau On (邱安).⁶¹ In 2014 a man named Terry Yau On (邱安) was criminally charged with “unlawful occupation of unleased land.”⁶²

5 HUANG SONGBO, HING LUNG TRADING CO., AND HONG KONG WANG HING LUNG CO.

5.1 Hing Lung and Hong Kong Wang Hing Lung

The names “Hing Lung Trading Company” (“Hing Lung”) and “Hong Kong Wang Hing Lung Trading Co.” (“Wang Hing Lung”) both contain the phrase “Hing Lung Trading.” Between them, Hing Lung and Wang Hing Lung remitted USD 2,099,880 to Person D in December 2011.

The companies are listed at two different Hong Kong addresses in the FINTRAC Report, but the HKCR Database⁶³ lists no companies in Hong Kong with these English names,⁶⁴ and no RAMCs were found listing their addresses in either the RAMC Database⁶⁵ or the 2012 RAMC List.⁶⁶ The address of Hing Lung Trading is in a small office building whose ground floor is given over to auto repair shops.⁶⁷ Wang Hing Lung’s address is listed on the 25th floor of a large, middle-class residential compound.⁶⁸

<https://www.scmp.com/news/hong-kong/hong-kong-law-and-crime/article/2160246/hong-kong-merchant-accused-us145-scam-bailed>

⁵⁸ 2011-10-22: <http://fengkai.hk/xiugui/201187.html> (archived at <https://archive.ph/jqcdB>)

2012-02-26: <http://boundlessfund.org/oldweb/web/html/donate001.html> (archived at <https://archive.ph/vDphz>)

January 2013: <http://paper.wenweipo.com/2013/01/15/zt1301150001.htm> (archived at <https://archive.ph/45TE9>)

2012-03-30: <http://www.ifengkai.net/thread-19356-1-1.html> (archived at <https://archive.ph/dpqhB>)

⁵⁹ Fong is not a shareholder of East Lucky Euro Motors. However, aside from sharing the same English and Chinese name “East Lucky” (英利), East Lucky and East Lucky Euro Motors are both connected to a family named Yau. As described below, East Lucky has a director named Terry Yau. Terry Yau uses two separate Hong Kong ID numbers in East Lucky’s annual reports (c.f. the 2019 annual report and 2015 annual report). One of those numbers also appears in the annual reports of East Lucky Euro Motors for a person named Yau Yuk Lam (邱育林), who owns 51% of shares individually and jointly owns the remaining 49% with another person. The annual reports were retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

⁶⁰ “List of Third Parties Appointed by Licensed Money Lenders in Relation to the Granting of Loans” published by the HKCR received an appointment to represent Hitachi Capital (Hong Kong) Limited in 2017. C.f. https://www.cr.gov.hk/mlr/docs/Appointed_Third_Parties_1_ATP.xls

⁶¹ According to annual reports retrieved from the HKCR Database (<https://www.icris.cr.gov.hk/>).

⁶² Case no. STS5947/2014

⁶³ <https://www.icris.cr.gov.hk/>

⁶⁴ There is a company named simply Hing Long Co. Ltd., which was previously named Hing Long Trading Co. Ltd., but it changed its name in 2006, more than five years before the December 2011 transaction.

⁶⁵ <https://eservices.customs.gov.hk/MSOS/wsrh/001s1>

⁶⁶ www.yumpu.com/en/document/read/8457345/remittance-agent-register (archived at <https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>)

⁶⁷ Room A, 1/F Wing Fu Factory Building [永如工業大廈], No. 10-14 Wang Wo Tsai Street, Tsuen Wan

⁶⁸ [REDACTED]

Though the company names do not appear in the HKCR Database, both appear in American SEC filings, where they are listed among the lenders who helped finance the 2013 management-led privatization of Feihe International, Inc., a Chinese company formerly listed on the NYSE.⁶⁹ The SEC filings do not provide any additional information about the companies.⁷⁰

5.2 Huang Songbo

No definitive information was found on Huang Songbo. A person with the English name Huang Songbo made a single transfer of USD 399,980 to Person D in January 2010, according to the FINTRAC Report. The records provide Huang’s date of birth (██████), but no other identifying information.⁷¹ He would have been 62 years old at the time of the transfer.

On 2020-06-10, the RAMC Database contained an entry for an RAMC at 63A Tong Choi Street, Mong Kok named Wong Chun Pak (黃松栢). Wong’s name in Mandarin is pronounced “Huang Songbo” or “Huang Songbai.” (In at least one other case—that of Yinwei International / Silverway International—the FINTRAC Report appears to use an English that differs from the legal name of a Hong Kong entity. See Section 5.3.)

WONG CHUN PAK TRADING AS CHONG FAT REMINBI EXCHANGE CO. 黃松栢 營業名稱 中發人民幣找換行	G/F, 63A TUNG CHOI STREET, MONG KOK, KOWLOON	Specified Premises
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Figure 4

The RAMC Database currently registers another RAMC immediately adjacent to Wong, at 59A-59B & 61A-61C Tung Choi Street.⁷² That RAMC’s name, Kong Hing Holdings Limited (港興控股有限公司), is consistent with a contraction of the name “Hong Kong Wang Hing Lung.” In addition, the 2012 RAMC List contains an entry for an RAMC at the same address (59A Tung Choi Street) named Hing Lung Money Exchange (興隆人民幣找換).⁷³

KONG HING HOLDING LIMITED 港興控股有限公司 營業名稱 港興	SHOP 5A, G/F, PROSPERITY BUILDING, 59A-59B & 61A-61C TUNG CHOI STREET, 6A-6E NELSON STREET, MONG KOK, KOWLOON (分行名稱：港興找換)	Specified Premises
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Figure 5

Separately, in 2010, a person with the English name Huang Songbo—and with a different Chinese name (黃松博) than Wong Chun Pak—held a license for leveraged foreign exchange trading (in addition to securities and futures trading) in Hong Kong, according to Webb-Site.com, a database that aggregates financial licensing information and other data on Hong Kong companies. Huang’s organization was listed on the license as CES Capital International (Hong Kong) Co., Limited,⁷⁴ which is part of the financial arm of China Eastern Airlines, a state-owned airline based in Shanghai.⁷⁵

⁶⁹ <https://sec.report/Document/0001019056-13-000327/>

⁷⁰ Other lenders in the SEC filings include China Trend Asia Limited; Gold Act Trading Limited; Lijiafeng Electronics (HK) Limited; Foreshore Holding Group Limited; Caoba Tongyuan INC; WSH Trade Develop Limited; Natural Dairy Farm Limited, OAD Wanchai HK; and Sun Jingyou.

⁷¹ Appendix B, p. 403

⁷² <https://eservices.customs.gov.hk/MSOS/wsrh/001s1>

⁷³ www.yumpu.com/en/document/read/8457345/remittance-agent-register (archived at <https://web.archive.org/web/20210310014522/https://www.yumpu.com/en/document/read/8457345/remittance-agent-register>)

⁷⁴ <https://webb-site.com/dbpub/sfclirec.asp?p=72835>

⁷⁵ <https://www.cmegroup.com/tools-information/find-a-broker/ces-capital-international-hong-kong-co-limited.html>

5.3 Zhong Sheng Investment Development Company

Zhong Sheng Investment transferred CAD 2,999,989 to Person D in December 2011, according to the FINTRAC Report.⁷⁶ Its name does not appear in the 2012 RAMC List or in the RAMC Database. Its address, as written in the FINTRAC Report,⁷⁷ appears on a list of warehouses for SF Express, a Chinese delivery service.⁷⁸

The name Zhong Sheng Investment Development Company was not found in the HKCR Database, but the name Zhong Sheng Investment & Development Co., Limited (中聖投資發展有限公司) (“Zhong Sheng”) was found. The company was established in December 2010 and dissolved in 2017. Three shareholders and directors are found in its records: Zhang Zhen Wei (張振偉), Chen Tie Lin (陳鐵林), and Zhang Yong Hong (張永紅). Mainland Chinese ID numbers were found for Zhang Zhen Wei and Zhang Yong Hong, which indicate that both are from the city of Linyi in Shandong Province.⁷⁹

⁷⁶ Appendix B, p. 405

⁷⁷ No. 1 Pak Sha Tsuen, Kung Um Road, Yuen Long. “Tsuen” here means “Village.” Kung Um Road does pass through Pak Sha Tsuen, but Google Maps, which is typically accurate for Hong Kong, puts No. 1 Kung Um Road in another village, not Pak Sha.

⁷⁸ https://www.sf-express.com/hk/en/download/Special_Warehouse_Service_HK_EN.pdf

⁷⁹ Zhang Zhen Wei: 142627197510020333. Zhang Yong Hong: 1426011968102011010.

APPENDIX E

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Canadian Imperial Bank of Commerce
400 Burrard Street
Vancouver, BC
V6C 3A6

Attention: Stephen Scholtz, Senior Vice-President and General Counsel
(Canada)

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2011 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any CIBC account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat 8, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hona Kona
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka A 211 tz 1}	Shop Og/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 228 Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]

2. With respect to each of the years 2012 - 2020 (inclusive) please advise if any CIBC account located in British Columbia received an electronic funds transfer from any of the accounts listed above.


TAKE NOTICE that the deadline for producing this material to the Commission is August 17, 2020 unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 7, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: BlueShore Financial ("BlueShore")
1250 Lonsdale Avenue
North Vancouver, BC V7M 2H6
c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Blueshore account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公 司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE

(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Bank of Montreal
 PO Box 49500, 595 Burrard Street
 Vancouver, BC V7X 1L7
 c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Bank of Montreal account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat 8, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hona Kona
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka A 21tz 1}	Shop Og/F Champion Bldg 287-291 Hong Kong	n/a
4.	Sunsing Co.	RM 228 Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Canadian Western Bank
666 Burrard Street, 22nd Floor
Vancouver, BC V6C 2X9
c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Canadian Western Bank account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Coast Capital Savings Federal Credit Union ("Coast Capital")
800-9900 King George Blvd
Surrey, BC V3T 0K7
c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Coast Capital account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a
4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong

TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]

Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: First West Credit Union ("First West")
6470-201 Street
Langley, BC V2Y 2X4

c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any First West account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a
4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong


TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: HSBC Bank Canada
885 West Georgia Street
Vancouver, BC V6C 3E9

c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any HSBC Bank Canada account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公 司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Royal Bank of Canada
2100-666 Burrard Street
Vancouver, BC V6C 2X8

c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Royal Bank of Canada account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公 司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Scotiabank
650 West Georgia Street
Vancouver, BC V6B 4P6

c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Scotiabank account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公 司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Toronto-Dominion Bank
700 West Georgia Street
Vancouver, BC V7Y 1A2

c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Toronto-Dominion Bank account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公 司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a

4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong
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TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Vancouver City Savings Credit Union ("Vancity")
PO Box 2120, Station Terminal
Vancouver, BC V6B 5R8
c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Vancity account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a
4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong

TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

APPENDIX F

Request

RBC was requested to provide for each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Royal Bank of Canada account located in British Columbia:

- 1) Kingson Co.
- 2) Huang Songbo
- 3) Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co.
- 4) Sunsing Co.

Data / Scope Limitations

Due to RBC's enterprise record retention policy, records were only available for September 2013 until current date.

Data is only provided for RBC clients where either the client's residential address or the address of the branch where the recipient account is held are located in British Columbia.

Electronic funds transfers which were processed through RBC's correspondent banking network and credited to accounts at other Canadian financial institutions are not included from this response.

Search Results

For remitters 1) Kingson Co., 2) Huang Songbo and 4) Sunsing Co., no electronic funds transfers were identified which meet the requested criteria.

Below are the results for remitter 3) Hing Wah China:

2013 (September to December only): **24** electronic fund transfers totaling **\$11,145,323.50 CAD** were credited to the accounts of RBC clients with accounts in British Columbia. There were an additional **2** electronic fund transfers totaling **\$1,900,000 CAD** that were sent to RBC clients but were cancelled prior to being credited to the beneficiary's account (funds were returned to the originating bank)

2014: no electronic funds transfers

2015: no electronic funds transfers

2016: **2** electronic fund transfers totaling **\$200,000 CAD** were sent to RBC clients with accounts in British Columbia but were cancelled prior to being credited to the beneficiary's account (funds were returned to the originating bank)

2017: no electronic funds transfers

2018: no electronic funds transfers

2019: no electronic funds transfers

2020 (January to August): no electronic funds transfers

One transfer was identified in 2018 from an unrelated remitter in Singapore which included payment details referencing a payment from Hing Wah China. This transfer was not included in the search results above.

APPENDIX G

September 11, 2020

Via E-mail

Eileen Patel
Associate Commission Counsel
Commission of Inquiry into Money
Laundering in British Columbia
P.O. Box 10073
601-700 West Georgia Street
Vancouver, BC
[REDACTED]

Re: Summons to Produce August 25, 2020

Ms. Patel:

On August 27, 2020 the Bank of Montreal ("BMO") received the above Summons electronically. A copy is attached for your reference and marked Exhibit A. Attached is the information requested by the summons and marked Exhibit B. [REDACTED]

[REDACTED] Thank you for agreeing to extend the production date. If you have any questions, please contact me.

Sincerely,

Marsha A. McClellan
Associate General Counsel & Vice President
Enterprise Regulatory Office | Legal and Regulatory Compliance
BMO Financial Group | [REDACTED]

Served electronically to Eileen Patel at [REDACTED]

Attachments: Exhibits A & B

COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA
SUMMONS TO PRODUCE
(22(1)(a) & (b) of the *Public Inquiry Act*)

To: Bank of Montreal
 PO Box 49500, 595 Burrard Street
 Vancouver, BC V7X 1L7
 c/o Legal Counsel

TAKE NOTICE that the Commission of Inquiry into Money Laundering in British Columbia summons you to produce to Commission counsel the following relevant information and records in your possession or control, except where such information or record is protected by privilege:

1. For each of the years 2009-2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the following accounts to any Bank of Montreal account located in British Columbia:

	Accountholder	Accountholder address	Institution name and address
1.	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong
2.	Huang Songbo Date of Birth: [REDACTED]		Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong
3.	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a
4.	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19 , Olympian City Hong Kong

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]


TAKE NOTICE that the deadline for producing this material to the Commission is **September 4, 2020** unless otherwise agreed by Commission counsel.

Should you have any question regarding compliance with this Summons please contact:

Eileen Patel
Associate Commission Counsel

Tel: [REDACTED]
Email: [REDACTED]

Date: August 25, 2020



The Honourable Austin F. Cullen
Commissioner

Exhibit B

Account Holder	2009		2010		2011		2012		2013		2014		2015		2016		2017-2020
	#	Total	#	Total	#	Total	#	Total	#	Total	#	Total	#	Total	#	Total	
Kingson Co.	3	\$255,514.37	4	\$627,755.10	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	No wires
Huang Songbo	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	No wires
Hing Wah China + HK Renmibi	0	0	1	\$899,130	1	\$499,990	1	\$351,276.69	101	\$52,215,083	59	\$28,431,899	0	\$0	2	\$150,000	No wires
Sunsing Co.	0	0	1	\$299,978.70	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	0	\$0	No wires
██████████	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█ █
██████████	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█ █

APPENDIX H

McCarthy Tétrault LLP
Suite 2400, 745 Thurlow Street
Vancouver BC V6E 0C5
Canada
[REDACTED]
Fax: 604-643-7900

**mccarthy
tétrault**

Jill Yates*
Partner

[REDACTED]
*Personal Law Corporation

Assistant: Macaspac, Edeline
Direct Line: [REDACTED]
Email: [REDACTED]

September 28, 2020

Via Email [REDACTED]

Confidential

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



**Attention: Nicholas Isaac
Commission Counsel**

Dear Mr. Isaac:

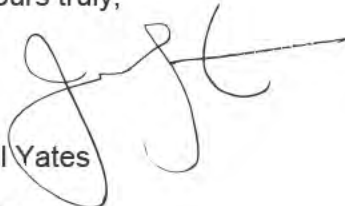
Re: Summons to produce issued to TD (August 25, 2020)

We write further to our letter dated September 18, 2020 and your response dated September 22, 2020.

Without prejudice to our client's entitlement to insist on the same in respect of other, including future, requests from the Commission, we have removed the redaction for confidentiality from the information set out below. As previously advised, this table sets out, for each of 2009 through 2020 (inclusive), the number of transfers and annual total value of electronic funds transfers originating from each of the four listed accounts to any account at a TD branch located in British Columbia.

Ordering Party	Year(s)	\$CAD	# CAD Wires	Year(s)	\$USD	# USD Wires
Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	2009-2010	-	0	2009-2010	-	0
	2011	\$132,545.04	3	2011	-	0
	2012	\$78,000.00	1	2012	-	0
	2013	\$13,622,421.15	31	2013	-	0
	2014	\$2,480,107.76	8	2014	-	0
	2015-2020	-	0	2015-2020	-	0
Subtotal		\$16,313,073.95	43		\$0.00	0
HUANG SONGBO	2009-2020	-	0	2009-2020	-	0
KINGSON CO	2009-2020	-	0	2009-2020	-	0
SUNSING CO	2009-2010	-	0	2009-2010	-	0
	2011	-	0	2011	\$53,880.00	1
	2012-2020	-	0	2012-2020	-	0
Subtotal		\$0.00	0		\$53,880.00	1
TOTAL	CAD	\$16,313,073.95	43	USD	\$53,880.00	1
		CAD			USD	

Yours truly,



Jill Yates

JY/ay

APPENDIX I



CANADIAN IMPERIAL BANK OF COMMERCE
Commerce Court West
199 Bay Street, 11th Floor
Toronto, ON M5L 1A2

AFSHAN ALI
Managing Counsel
Tel: [REDACTED]
Email: [REDACTED]

August 18, 2020

VIA EMAIL - CONFIDENTIAL

Kelsey A. Rose
Junior Commission Counsel
[REDACTED]

Dear Ms. Rose,

Re: Cullen Commission

Further to the summons dated August 7 (served on August 10), please find the information required below.

1. The number of transfers and annual total value of electronic transfers originating from the following accounts for the years 2009-2011 was as follows:

Number of Transfers Originating from each of the Following Persons/Entities to any CIBC Account Located in B.C.

Name	2009	2010	2011
Kingson Co.	1	6	1
Huang Songbo Date of Birth: [REDACTED] [REDACTED]	0	1	0
Hing Wah China + HK Renmibi aka Hing Wah China and HK Renminbi Exchange Co.	0	1	1
Sunsing Co	0	2	0
[REDACTED] [REDACTED]	1	1	1
[REDACTED] [REDACTED]	1	1	1

Annual Total Value of Electronic Fund Transfers From Each of the Following Persons/Entities to any CIBC Account Located in B.C.

Name	2009	2010	2011
Kingson Co.	\$14,377 USD	\$9,199,892 USD	\$77,444 USD
Huang Songbo Date of Birth: [REDACTED] [REDACTED]	0	\$399,980 USD	0
Hing Wah China + HK Renmibi aka Hing Wah China and HK Renminbi Exchange Co.	0	\$1,600,000 USD	\$299,960.73 USD
Sunsing Co.	0	\$3,189,960 USD	0
[REDACTED] [REDACTED]	■	■	■
[REDACTED] [REDACTED]	■	■	■

2. Yes; please advise if further information is required.

Yours truly,



Afshan Ali
Managing Counsel

APPENDIX J

Wire Message Date	Wire Sender Name (From Summons)	Wire Sender Name (From Wire Details)	Amount
2013-05-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	HING WAH CHINA AND HK RENMINBI1/EXCHANGE CO2/SHOP C G/F CHAMPION BLDG 287- 2913/HK/HONG KONG:	\$300,000.00
2013-06-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$105,837.00
2013-08-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$168,052.30
2013-11-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$100,000.00
2014-02-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$100,000.00
2014-02-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	50K:/0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$100,000.00
2014-02-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AMD HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$100,000.00
2014-03-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$80,000.00
2014-04-01	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co	0120877208HING WAH CHINA AND HK RENMINBIEXCHANGE COSHOP C G/F CHAMPION BLDG 287-291 DES VOEUX RD C HK	\$300,000.00

APPENDIX K

D. Ross McGowan



Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard St, P.O. Box 48600
Vancouver, BC, Canada V7X 1T2
P 604.687.1415
blg.com



September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, HSBC Bank Canada ("HSBC") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of certain information relating to electronic funds transfers ("EFT") that originated from certain named foreign parties.

The searches done by HSBC relating to each is described below:

- a. **SWIFT wires:** HSBC was able to pull wire information including originator information as referenced in the attached chart.
- b. **E-Transfers:** As these are primarily an Interac product, HSBC has limited information on the sender – typically only an email address or phone number, which cannot be attributed with certainty to any sender.

Transaction records were available to 2013, but were not available for the period preceding 2013.

Yours truly,

Borden Ladner Gervais LLP

D. Ross McGowan

DRM/jb

	Originator as per Summons	Accountholder Address as per Summons	Institution Name & Address	Number of Transfers per Year (2013-2020)	Total Annual Value of Electronic Funds Transfers originating from each of the accounts to any HSBC Bank Canada account located in BC
1	Kingson Co.	Flat B, 22/F, Unionway Comm Centre 283 Queen's Road Central Hong Kong	OCBC Wing Hang Bank Limited 181 Queen's Road, Central 999077 Hong Kong	0	0
2	Huang Songbo (DOB: [REDACTED])	n/a	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West Kowloonbank of China Centerfloor 19, Olympian City Hong Kong	0	0
3	Hing Wah China + HK Renmibi, aka Hing Wah China and HK Renminbi Exchange Co., aka 兴华人民币找换公司	Shop 0 g/F Champion Bldg 287-291 Hong Kong	n/a	2013: 66 2014: 19 2015: 0 2016: 0 2017: 0 2018: 0 2019: 0 2020: 0	2013: CAD \$31,920,821.57 2014: CAD \$9,569,853.24 2015: 0 2016: 0 2017: 0 2018: 0 2019: 0 2020: 0
4	Sunsing Co.	RM 22B Unionway COML CTR 283 Queen's Rd Central Hong Kong	Bank of China (Hong Kong) Limited 11 Hoi Fai Road West, Kowloon Bank of China, Centerfloor 19, Olympian City Hong Kong	0	0

APPENDIX L

D. Ross McGowan



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1200 Waterfront Centre
200 Burrard St, P.O. Box
48600
Vancouver, BC, Canada V7X
1T2

F 604.687.1415
blg.com

BLG
Borden Ladner Gervais

September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, Canadian Western Bank ("CWB") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of certain information relating to electronic funds transfers ("EFT") that originated from certain named foreign accounts.

The Summons seeks information over an 11 year historic period, without specific reference to identifiable transactions spanning the last 11 years and does not identify or narrow search criteria by:

- a) domestic recipient account;
- b) date of transaction; or
- c) amount of transaction.

Thus, a generic request for unspecified target data based on payment originator and originating bank covering this breadth of time poses substantial challenges for response.

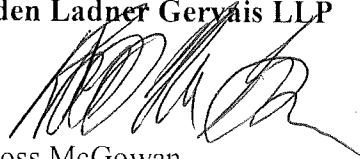
For purposes of clarity and disclosure of efforts to address the Summons, the generic reference to EFT's as made in the Summons could be subject to varying interpretations. However, the only way CWB is able to receive funds from outside of Canada is by wire, thus focussing the scope of search efforts. CWB is not a SWIFT member, and therefore uses the services of another Canadian financial institution for its SWIFT clearing.

CWB has conducted various searches of all of its electronic records relating to wires. These electronic records are available from November 1, 2014 onward. CWB does not have an electronic or other automated way to search transaction records regarding international wires for the period prior to November 1, 2014.

Based on searches of its electronic records relating to wires, CWB has not been able to find any record of receipt of any funds as set out in the Summons, for the period November 1, 2014 to the date that searches were conducted by CWB (namely, September 9, 2020).

Yours truly,

Borden Ladner Gervais LLP

A handwritten signature in black ink, appearing to read 'D. Ross McGowan', is written over the printed name.

D. Ross McGowan

DRM/jb

APPENDIX M

D. Ross McGowan
[REDACTED]

Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard St, P.O. Box 48600
Vancouver, BC, Canada V7X 1T2
[REDACTED]
F 604.687.1415
blg.com

BLG
Borden Ladner Gervais

September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, BlueShore Financial Credit Union ("BlueShore") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of certain information relating to electronic funds transfers ("EFT") that originated from certain named foreign parties.

For purposes of clarity and disclosure of efforts to address the Summons, the generic reference to EFT's as made in the Summons has been interpreted by BlueShore as potentially referencing 3 separate systems.

The Summons seeks information over an 11 year historic period, without specific reference to identifiable transactions spanning the last 11 years and does not identify or narrow search criteria by:

- a) domestic recipient account;
- b) date of transaction; or
- c) amount of transaction.

Thus, a generic request for unspecified target data based on payment originator covering this breadth of time poses substantial challenges for response.

Transaction records are retained for the statutory required time applicable to the record and are then destroyed. Usually this means that individual transaction records are not available after 7 years.

With respect to each category of EFT, the payment architecture differs. For example, international wire transfers are fulfilled over the SWIFT system. BlueShore does not have a SWIFT address and therefore is required to outsource such activity. This also means that BlueShore does not record information that identifies the sender of an international wire transfer.

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Lawyers | Patent & Trade-mark Agents

The searches done by BlueShore relating to each is described below:

- a. **SWIFT wires:** BlueShore is not able to pull all information for these as Central 1 holds the repository of wire information including originator information. BlueShore sees these on an individual transaction basis, and has no way of pulling the information to identify whether the funds from the named foreign parties in question have been sent to BlueShore's clients.
- b. **Pre-Authorized Debits:** These are typically domestic payments that are set up. International payments are difficult to set up, and as a result BlueShore has a limited number of these. The way the system is set up would mean it to be very unlikely firstly that it would be set up, and secondly for BlueShore to actually see the originating sender (usually BlueShore would only see the sending FI).
- c. **E-Transfers:** As these are primarily an Interac product, BlueShore has limited information on the sender – typically only an email address or phone number, which cannot be attributed with certainty to any sender.

More specifically, BlueShore is not able to do a full search for any and all EFTs received by the listed parties referenced in the Summons. This is because the BlueShore banking systems do not record sender information for EFTs. BlueShore's services provider for funds transfers is MTS, and BlueShore is also not able to search their systems for sender details. BlueShore has inquired of Central 1 Credit Union whether they are able to conduct those searches, but have not received a response to the inquiry.

We therefore advise that BlueShore has not been able to identify records or information as sought by the Summons.

Yours truly,

Borden Ladner Gervais LLP


D. Ross McGowan

DRM/jb

APPENDIX N

D. Ross McGowan

Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard St, P.O. Box 48600
Vancouver, BC, Canada V7X 1T2
F 604.687.1415
blg.com

BLG
Borden Ladner Gervais

September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, Coast Capital Savings Federal Credit Union ("CCS") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of information relating to electronic funds transfers ("EFT") that originated from certain named foreign parties.

The reference to EFTs in the Summons is interpreted by CCS as potentially referencing two separate systems:

- o Wire transfers; and
- o e-Transfers (domestic only)

The Summons seeks information over an 11-year historic period, without specific reference to identifiable transactions and does not identify or narrow search criteria by:

- a) member recipient account;
- b) date of transaction; or
- c) amount of transaction.

A generic request for unspecified target data based on the payment originator over that breadth of time poses substantial challenges for response. In particular, although CCS keeps all records required to meet its regulatory obligations, it is not able to do a full search of all EFTs by sender name to identify any and all transactions that may have been initiated by the parties referenced in the Summons.

CCS has been able to extract information from one of its anti-money laundering service providers systems in a searchable format relating to FINTRAC transaction reporting, including electronic funds transfer reports that it made from 2012 to present. CCS has searched those documents and 115239272.v1

Lawyers | Patent & Trade-mark Agents

no hits on the payment originators listed in the Summons have been identified. The CCS records searched may not include details on funds sent by the listed senders, as CCS uses other service providers to receive transactions from international senders. Those service providers, who were the initial recipients of funds in Canada, and not CCS, may have been responsible for filing the EFT reports for those transactions.

As a result, CCS has not been able to identify records or information as sought by the Summons.

Yours truly,

Borden Ladner Gervais LLP



D. Ross McGowan

DRM/jb

APPENDIX O

D. Ross McGowan
[REDACTED]

Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard St, P.O. Box 48600
Vancouver, BC, Canada V7X 1T2
[REDACTED]
F 604.687.1415
blg.com

BLG
Borden Ladner Gervais

September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, First West Credit Union ("FWCU") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of certain information relating to electronic funds transfers ("EFT") that originated from certain named foreign parties.

For purposes of clarity and disclosure of efforts to address the Summons, the generic reference to EFT's as made in the Summons has been interpreted by FWCU as potentially referencing 3 separate systems:

- o Wire transfers
- o PAD/PAC; and
- o E transfers (domestic only).

The Summons seeks information over an 11 year historic period, without specific reference to identifiable transactions spanning the last 11 years and does not identify or narrow search criteria by:

- a) domestic recipient account;
- b) date of transaction; or
- c) amount of transaction.

Thus, a generic request for unspecified target data based on payment originator covering this breadth of time poses substantial challenges for response.

Transaction records are retained for the statutory required time applicable to the record and are then destroyed. This means that individual transaction records are not generally available after 7 years.

With respect to each category of EFT, the payment architecture differs. For example, international wire transfers are fulfilled over the SWIFT system. FWCU does not have a SWIFT address and therefore is required to outsource such activity. This also means that FWCU does not record information that identifies the sender of an international wire transfer.

More specifically, FWCU is not able to do a full search for any and all EFTs received by the listed parties referenced in the Summons. This is because the FWCU banking systems do not record sender information for EFTs. FWCU's services provider for funds transfers during the period was MTS, and FWCU is also not able to search their systems for sender details. The only search capabilities are to search by date and by money transfer system#. There is no practical method to search all incoming wires by business name, address or originating financial institution. Manual searches of each and every incoming wire over the period might be able to source additional information, but such an approach is not practical and would involve a review of thousands of records.

We therefore advise that FWCU has not been able to identify records or information as sought by the Summons.

Yours truly,

Borden Ladner Gervais LLP



D. Ross McGowan

DRM/drm

APPENDIX P

D. Ross McGowan



Borden Ladner Gervais LLP
1200 Waterfront Centre
200 Burrard St, P.O. Box
48600
Vancouver, BC, Canada V7X
1T2

F 604.687.1415
blg.com

BLG
Borden Ladner Gervais

September 21, 2020

By email to [REDACTED]
Eileen Patel
Associate Commission Counsel
Cullen Commission

Dear Sir/Madam:

Re: Summons to Produce dated August 25, 2020

We write on behalf of our client, Vancouver City Savings Credit Union ("Vancity") and in response to the Summons dated August 25, 2020 (the "Summons") for provision of information relating to electronic funds transfers ("EFT") that originated from certain named foreign parties.

Vancity has searched its systems for any possible accounts for transactions or accounts relating to the stated individual/company and found no matches. Vancity has (with the assistance of Central 1) reviewed incoming and outgoing SWIFT/MTS transactions including historical data going back to Jan 1, 2009, and found no matches. **Therefore, to the best of our knowledge, both the number of transfers and the total value of electronic funds transfers originating from each of the noted accounts referenced in the Summons are zero.**

The Summons seeks information over an 11-year historic period, without specific reference to identifiable transactions and does not identify or narrow search criteria by:

- a) member recipient account;
- b) date of transaction; or
- c) amount of transaction.

A generic request for unspecified target data based on the payment originator over that breadth of time poses substantial challenges for response. In particular, although Vancity keeps all records required to meet its regulatory obligations, it is not able to do a full search of all EFTs by sender

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Lawyers | Patent & Trade-mark Agents

name to identify any and all transactions that may have been initiated by the parties referenced in the Summons.

As a result, Vancity has not been able to identify records or information as sought by the Summons.

Yours truly,

Borden Ladner Gervais LLP



D. Ross McGowan

DRM/jb

APPENDIX Q

LAND TITLE ACT**FORM A**

(Section 181(1))

Province of

British Columbia

FREEHOLD TRANSFER

(This area for Land Title Office use)

PAGE 1 of 1 pages

1. APPLICATION: (Name, address, phone number and signature of applicant, applicant's solicitor or agent) **West Coast****Client #**

Vancouver, B.C.,

File Reference No:

Signature of Applicant's Agent,

2. (a) PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:*

(PID)

(LEGAL DESCRIPTION)

(b) MARKET VALUE: \$2,000.00

3. CONSIDERATION: \$2,000.00

4. TRANSFEROR(S):*

5. FREEHOLD ESTATE TRANSFERRED:*

FEE SIMPLE

ML 07/15:02:14 01 LM

FEE SIMPLE

\$65.65

6. TRANSFeree(S): (Including occupation(s), postal address(es) and postal code(s))*

Person A, Businessman, and Person B Homemaker as JOINT TENANTS, both of

Vancouver, B.C.

7. EXECUTION(S):** The transferor(s) accept(s) the above consideration and understand(s) that this instrument operates to transfer the freehold estate in the land described above to the transferee(s).

Execution Date

Officer Signature(s)

Y M D
07

Transferor(s) Signature(s)

NOTARY PUBLIC

VANCOUVER, B.C. V6M 4J7
TEL: FAX:**OFFICER CERTIFICATION:**

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the Evidence Act, R.S.B.C. 1996, c. 124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the Land Title Act as they pertain to the execution of this instrument.

* If space insufficient, enter "SEE SCHEDULE" and attach schedule in Form E.

** If space insufficient, continue executions on additional page(s) in Form D.

END OF DOCUMENT

PF

APPENDIX R

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT

FORM A (Section 185(1))

FREEHOLD TRANSFER Province of British Columbia

PAGE 1 OF 1 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Vancouver

BC

Document Fees: \$71.90

Deduct LTSA Fees? Yes ☒2a. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:
[PID] [LEGAL DESCRIPTION]STC? YES ☐

2b. MARKET VALUE: \$ 14,000

3. CONSIDERATION: \$ 14,000

4. TRANSFEROR(S):

5. FREEHOLD ESTATE TRANSFERRED: Fee Simple

6. TRANSFEREE(S): (including occupation(s), postal address(es) and postal code(s))

Person C STUDENT

VANCOUVER

BRITISH COLUMBIA

CANADA

7. EXECUTION(S): The transferor(s) accept(s) the above consideration and understand(s) that the instrument operates to transfer the freehold estate in the land described above to the transferee(s)

Officer Signature(s)

Execution Date

Transferor(s) Signature(s)

Y	M	D
12		

Person C

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

APPENDIX S

LAND TITLE ACT
FORM 17Province of
British Columbia

2015 13 51

Person A

Person B

Vancouver

Page 1 of pages

1. APPLICATION: (Name, address, phone number and signature of applicant, applicant's solicitor or agent)

Person A Person B

SIGNATURE

2. (a) PARCEL IDENTIFIER(S) AND LEGAL DESCRIPTION(S) OF LAND: *

(PID)

(LEGAL DESCRIPTION)

(B) MARKET VALUE: \$ 3,000
(IF FEE SIMPLE)CB 2015 PM 3 2
Name Chnge 1 \$25.48

3. NATURE OF INTEREST:

Change of Name

4. FULL NAME, ADDRESS AND OCCUPATION OF PERSON(S) ENTITLED TO BE REGISTERED:*

Person A

Person B

Vancouver

businessman
homemaker

*NOTE: Before submitting this application for registration applicants should check and satisfy themselves as to the tax position, including taxes of the crown provincial, a municipality and improvement, water and irrigation districts.

CANADA
BRITISH COLUMBIA

Previous Name: Person A
New Name: Person A
Place of Residence: VANCOUVER, BRITISH COLUMBIA

Children's Names Changed:

FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****

BRITISH
COLUMBIA

Given under my hand at Victoria, British Columbia
this [REDACTED] day of [REDACTED] 2014

Registration Date: [REDACTED]

Registration No: 2014 [REDACTED]

VSA 438L (09/09)

Jack Shewchuk
Chief Executive Officer
Vital Statistics Agency



Certified extract from
Registration of Name Change
filed at Victoria, BC,
Canada.



Original produced and returned to applicant after being copied. Dated: [REDACTED] 1/15 Registrar/per: [REDACTED]

CANADA
BRITISH COLUMBIA

Previous Name: Person B
New Name: Person B
Place of Residence: VANCOUVER, BRITISH COLUMBIA

Children's Names Changed:

FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****

BRITISH
COLUMBIA

Given under my hand at Victoria, British Columbia
this [redacted] day of [redacted] 2014

Registration Date: [redacted] 2014

Registration No: 2014-[redacted]

VSA 438L (09/09)

Jack Shewchuk
Chief Executive Officer
Vital Statistics Agency



Certified extract from
Registration of Name Change
filed at Victoria, BC,
Canada.



Original produced and returned to applicant after being copied. Dated: [redacted] 13 Registrar/per: [signature]

CANADA

) IN THE MATTER OF

) Full Legal Name of Person B and
Person B

PROVINCE OF BRITISH COLUMBIA

TO WIT:

I, Person B, A.K.A. Person B of [REDACTED] in the Province of
British Columbia, DO SOLEMNLY DECLARE:

1. That I am Person B and Person B
2. That Person B and Person B are one and the same person.

AND I make this solemn declaration, conscientiously believing it to be true, and knowing that it
is of the same force and effect as if made under oath.

DECLARED BEFORE ME at Vancouver, in)
the Province of British Columbia, this)
[REDACTED] day of [REDACTED] 2015.)

A Commissioner for Taking Affidavits in)
British Columbia)

Person B

Person B

Notary Public

Vancouver, BC

CANADA

) IN THE MATTER OF

) Full Legal Name of Person A and
) Person A

PROVINCE OF BRITISH COLUMBIA

)

)

)

)

TO WIT:

)

I, Person A, A.K.A. Person A of [REDACTED] in the Province of British
Columbia, DO SOLEMNLY DECLARE:

1. That I am Person A and Person A.
2. That Person A and Person A are one and the same person.

AND I make this solemn declaration, conscientiously believing it to be true, and knowing that it
is of the same force and effect as if made under oath.

DECLARED BEFORE ME at Vancouver, in)
the Province of British Columbia, this)
[REDACTED] day of [REDACTED] 2015.)

Person A

Person A

A Commissioner for taking Affidavits in)
British Columbia)

[REDACTED]
Notary Public

Vancouver, BC [REDACTED]
[REDACTED]

**NOTICE DECLINING TO REGISTER
SECTION 308 - LAND TITLE ACT**

Person A and Person B
[REDACTED]
Vancouver BC [REDACTED]

NEW WESTMINSTER LAND TITLE OFFICE
300 - 88 SIXTH STREET
NEW WESTMINSTER, BC
V3L 5B3

Date of Issue: [REDACTED]

Date of Expiry: [REDACTED]

File Reference:

In the matter of the following application(s):

Doc.: [REDACTED] FREEHOLD TRANSFER
Doc.: [REDACTED] FREEHOLD TRANSFER

DEFECTED LH [REDACTED] 2015 [REDACTED] AM 2 2
DEFECTED Notice Decline Register 1 \$12.88

Related to the following parcels:

[REDACTED]
[REDACTED]

TAKE NOTICE that I am unable to proceed with registration of the noted application(s). My reasons for refusing to proceed and my requirements are as follows:

REASON:

The names shown on the certificate attached to the Form 17 do not conform to the names registered on the title.

REQUIREMENT:

Provide evidence that is satisfactory to the Registrar that the name on the certificate is of the same person/company registered on title.

REFERENCE(S):

Land Title Act section 150 and 191

If these requirements are not met within 31 days from the date of this notice, the application(s) will become cancelled and void. A cancellation fee will apply if the application(s) is cancelled. Any document which is returned herewith must be corrected and re-submitted

Fee for this notice: \$12.88

Please pay the defect fee when re-submitting the application(s). Cheques are made payable to "Land Title and Survey Authority of BC".

LAURA GALL
Examiner of Title

LARRY BLASCHUK
Registrar of Land Titles

For help, go to <http://help.ltsa.ca>. To reach the LTSA Customer Service Centre for general land title and survey matters, select option 1 at 604-630-9630 or toll free at 1-877-577-LTSA(5872) or send a request at <https://myltsa.ltsa.ca/contact-customer-service-centre>. For myLTSA sign-up or technical assistance, contact myLTSA Technical Support by selecting option 2 at 604-630-9630 or toll free at 1-877-577-LTSA(5872) or send an request at <https://myltsa.ltsa.ca/contact-myltsa-tech-support>

LAND TITLE ACT
FORM 17

2015 13

50

Province of
British Columbia

Person C

Vancouver BC,

Page 1 of 1 pages

1. APPLICATION: (Name, address, phone number and signature of applicant, applicant's solicitor or agent)

Person C

SIGNATURE

2. (a) PARCEL IDENTIFIER(S) AND LEGAL DESCRIPTION(S) OF LAND: *

(PID) (LEGAL DESCRIPTION)

(B) MARKET VALUE: \$ 15,000
(IF FEE SIMPLE)CB 2015 PM 3 2
Name Chnge 1 \$25.48

3. NATURE OF INTEREST:

Change of Name

Person C

Vancouver, BC,

4. FULL NAME, ADDRESS AND OCCUPATION OF PERSON(S) ENTITLED TO BE REGISTERED: *

Person C, Vancouver, BC, Student

*NOTE: Before submitting this application for registration applicants should check and satisfy themselves as to the tax position, including taxes of the crown provincial, a municipality and improvement, water and irrigation districts.

CANADA
BRITISH COLUMBIA

Previous Name: Person C
New Name: Person C
Place of Residence: VANCOUVER, BRITISH COLUMBIA

Children's Names Changed:

FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****
FROM: *****
TO: *****

BRITISH
COLUMBIA

Given under my hand at Victoria, British Columbia
this [REDACTED] day of [REDACTED] 2014

Registration Date: [REDACTED] 2014

Registration No: 2014-[REDACTED]

VSA 438L (09/09)

Jack Shewchuk
Chief Executive Officer
Vital Statistics Agency



Certified extract from
Registration of Name Change
filed at Victoria, BC,
Canada.



Original produced and returned to applicant after being copied. Dated: [REDACTED] 15 Registrar/per: [REDACTED]

CANADA

PROVINCE OF BRITISH COLUMBIA

TO WIT:

) IN THE MATTER OF
) Full Legal Name of Person C and
) Person C
)
)
)
)

I, Person C A.K.A. Person C of [REDACTED] in the Province of
British Columbia, DO SOLEMNLY DECLARE:

1. That I am Person C and Person C
2. That Person C and Person C are one and the same person.

AND I make this solemn declaration, conscientiously believing it to be true, and knowing that it
is of the same force and effect as if made under oath.

DECLARED BEFORE ME at Vancouver, in)
the Province of British Columbia, this)
day of [REDACTED] 2015)
[REDACTED])

A Commissioner for taking Affidavits in)
British Columbia)

[REDACTED]
Notary Public
[REDACTED]
Vancouver, BC
[REDACTED]

Person C
[REDACTED]

**NOTICE DECLINING TO REGISTER
SECTION 308 - LAND TITLE ACT**

Person C

[REDACTED]
Vancouver BC [REDACTED]NEW WESTMINSTER LAND TITLE OFFICE
300 - 88 SIXTH STREET
NEW WESTMINSTER, BC
V3L 5B3

Date of Issue: [REDACTED] 2015

Date of Expiry: [REDACTED] 2015

File Reference:**In the matter of the following application(s):**

Doc.: [REDACTED] FREEHOLD TRANSFER

Doc.: [REDACTED] FREEHOLD TRANSFER

DEFECTED LH [REDACTED] 2015 [REDACTED] AM 2 2
DEFECTED Notice Decline Register 1 \$12.88**Related to the following parcels:**[REDACTED]
[REDACTED]

TAKE NOTICE that I am unable to proceed with registration of the noted application(s). My reasons for refusing to proceed and my requirements are as follows:

REASON:

The names shown on the certificate attached to the Form 17 do not conform to the names registered on the title.

REQUIREMENT:

Provide evidence that is satisfactory to the Registrar that the name on the certificate is of the same person/company registered on title.

REFERENCE(S):

Land Title Act section 150 and 191

If these requirements are not met within 31 days from the date of this notice, the application(s) will become cancelled and void. A cancellation fee will apply if the application(s) is cancelled. Any document which is returned herewith must be corrected and re-submitted

Fee for this notice: \$12.88

Please pay the defect fee when re-submitting the application(s). Cheques are made payable to "Land Title and Survey Authority of BC".

LAURA GALL
Examiner of Title

LARRY BLASCHUK
Registrar of Land Titles

For help, go to <http://help.ltsa.ca>. To reach the LTSA Customer Service Centre for general land title and survey matters, select option 1 at 604-630-9630 or toll free at 1-877-577-LTSA(5872) or send a request at <https://myltsa.ltsa.ca/contact-customer-service-centre>. For myLTSA sign-up or technical assistance, contact myLTSA Technical Support by selecting option 2 at 604-630-9630 or toll free at 1-877-577-LTSA(5872) or send an request at <https://myltsa.ltsa.ca/contact-myltsa-tech-support>

APPENDIX T

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT
FORM B (Section 225)

2016

MORTGAGE - PART 1 Province of British Columbia

PAGE 1 OF 4 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒

2. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:

[PID]

[legal description]

STC? YES ☐

3. BORROWER(S) (MORTGAGOR(S)): (including postal address(es) and postal code(s))

Person C , Student

Vancouver

BC

Canada

4. LENDER(S) (MORTGAGEE(S)): (including occupation(s), postal address(es) and postal code(s))

CANADIAN IMPERIAL BANK OF COMMERCE

Vancouver

BC

Canada

5. PAYMENT PROVISIONS:

(a) Principal Amount:

\$8,000,000.00

(b) Interest Rate:

See Schedule

(c) Interest Adjustment

Date:

Y

M

D

16

(d) Interest Calculation Period:

See Schedule

(e) Payment Dates:

On Demand

(f) First Payment

Date:

16

(g) Amount of each periodic payment:

Interest Only

(h) *Interest Act* (Canada) Statement.

The equivalent rate of interest calculated half yearly not in advance is NA % per annum.

(i) Last Payment

Date: N/A

(j) Assignment of Rents which the applicant wants registered?

YES ☐ NO ☒

If YES, page and paragraph number:

(k) Place of payment:

Postal Address In Item 4

(l) Balance Due

Date:

On Demand

MORTGAGE – PART 1

PAGE 2 OF 4 PAGES

6. MORTGAGE contains floating charge on land ?
 YES ☐ NO ☒

7. MORTGAGE secures a current or running account ?
 YES ☒ NO ☐

8. INTEREST MORTGAGED:

Freehold ☒

Other (specify) ☐

9. MORTGAGE TERMS:

Part 2 of this mortgage consists of (select one only):

(a) Prescribed Standard Mortgage Terms ☐

(b) Filed Standard Mortgage Terms ☒

(c) Express Mortgage Terms ☐

D F Number: MT080113

(annexed to this mortgage as Part 2)

A selection of (a) or (b) includes any additional or modified terms referred to in item 10 or in a schedule annexed to this mortgage.

10. ADDITIONAL OR MODIFIED TERMS:

See Schedule

11. PRIOR ENCUMBRANCES PERMITTED BY LENDER:

N/A

12. EXECUTION(S): This mortgage charges the Borrower's interest in the land mortgaged as security for payment of all money due and performance of all obligations in accordance with the mortgage terms referred to in item 9 and the Borrower(s) and every other signatory agree(s) to be bound by, and acknowledge(s) receipt of a true copy of, those terms.

Officer Signature(s)

Execution Date

Borrower(s) Signature(s)

Barrister & Solicitor

Vancouver, BC

(as to the signature of Person C)

Y	M	D
16		

Person C

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

LAND TITLE ACT
FORM D

EXECUTIONS CONTINUED

PAGE 3 of 4 pages

Officer Signature(s)

Execution Date

Transferor / Borrower / Party Signature(s)

Y M D

16

Barrister & Solicitor

Vancouver, B.C.

(as to both signatures)

Person A
as GuarantorPerson B
as Guarantor

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

Land Title Act
Form E
SCHEDULE

Enter the required information in the same order as the information must appear on the Freehold Transfer form, Mortgage form, or General Instrument form.

11954-2014/02
British Columbia

5. Payment Provisions
Interest Rate
(Box 5(b))

The interest rate is a variable rate per year equal to the CIBC Prime Rate plus SIX per cent (Six%) per year, calculated and compounded monthly, with interest on overdue interest at the same rate. The interest rate will change automatically, without notice, whenever the CIBC Prime Rate changes.

Interest Calculation Period
(Box 5(d))

Despite the interest rate noted above, the interest rate you will pay on any part of the Debt will be the interest rate specified in the relevant Agreement which relates to that part of the Debt. Interest will be calculated as set out in the relevant Agreement or, if not set out, will be calculated and compounded monthly, with interest on overdue interest at the same rate. If no interest rate is specified in the relevant Agreement, you will pay interest on such part of the Debt at the Interest Rate.

Interest is payable both before and after demand and both before and after default and judgment.

10. Additional or Modified Terms
(Box 10)

This schedule forms part of a mortgage made pursuant to the *Land Title Act* and regulations thereunder. The following terms when used in this schedule have the meanings ascribed to them in the set of Standard Mortgage Terms referred to in the Form B Mortgage - Part 1 of which this schedule forms part:

Agreement(s)
Debt
CIBC Prime Rate

APPENDIX U

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT

FORM A (Section 185(1))

FREEHOLD TRANSFER Province of British Columbia

PAGE 1 OF 4 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒2a. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:
[PID] [LEGAL DESCRIPTION]STC? YES ☐

2b. MARKET VALUE: \$ 15,000.00

3. CONSIDERATION: \$ 15,000.00

4. TRANSFEROR(S):

SEE SCHEDULE5. FREEHOLD ESTATE TRANSFERRED: **Fee Simple**

6. TRANSFEREE(S): (including occupation(s), postal address(es) and postal code(s))

Person A Retired

VANCOUVER

BC

CANADA

7. EXECUTION(S): The transferor(s) accept(s) the above consideration and understand(s) that the instrument operates to transfer the freehold estate in the land described above to the transferee(s)

Officer Signature(s)

Lawyer & Notary Public

Execution Date

Y	M	D
16		

Transferor(s) Signature(s)

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

FORM_E_V23

**LAND TITLE ACT
FORM E**

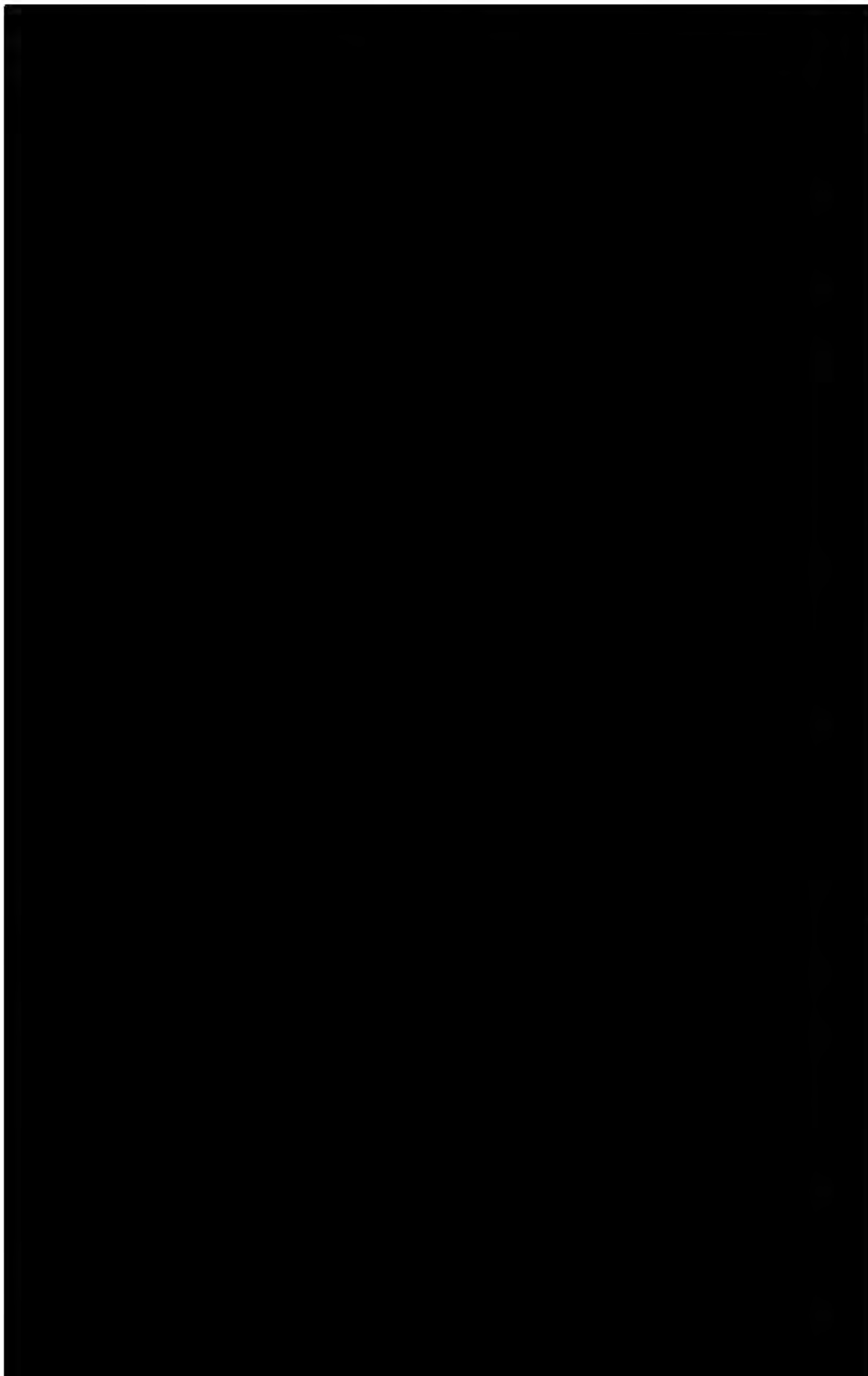
SCHEDULE

PAGE 2 OF 4 PAGES

ENTER THE REQUIRED INFORMATION IN THE SAME ORDER AS THE INFORMATION MUST APPEAR ON THE FREEHOLD TRANSFER FORM, MORTGAGE FORM, OR GENERAL INSTRUMENT FORM.

4. TRANSFEROR(S):

[REDACTED]





NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT
FORM B (Section 225)

2016

MORTGAGE - PART 1 Province of British Columbia

PAGE 1 OF 3 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Barristers and Solicitors

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒

2. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:

[PID] [legal description]

STC? YES ☐

3. BORROWER(S) (MORTGAGOR(S)): (including postal address(es) and postal code(s))

Person A Retired

Vancouver

BC

Canada

4. LENDER(S) (MORTGAGEE(S)): (including occupation(s), postal address(es) and postal code(s))

CANADIAN IMPERIAL BANK OF COMMERCE

Vancouver

BC

5. PAYMENT PROVISIONS:

(a) Principal Amount:

\$7,800,000.00

(b) Interest Rate:

2.190% per annum

(c) Interest Adjustment
Date:Y M D
16

(d) Interest Calculation Period:

Compounded, semi annually, not in advance

(e) Payment Dates:

Monthly, on the 2nd day of the month

(f) First Payment
Date:

16

(g) Amount of each periodic payment:

\$33,748.71

(h) Interest Act (Canada) Statement.
The equivalent rate of interest calculated
half yearly not in advance
is N/A % per annum.(i) Last Payment
Date:

18

(j) Assignment of Rents which the
applicant wants registered ?YES ☐ NO ☒

If YES, page and paragraph number:

(k) Place of payment:

Postal Address In Item 4

(l) Balance Due
Date:

18

MORTGAGE – PART 1

PAGE 2 OF 3 PAGES

6. MORTGAGE contains floating charge on land ?
 YES ☐ NO ☒

7. MORTGAGE secures a current or running account ?
 YES ☐ NO ☒

8. INTEREST MORTGAGED:

Freehold ☒

Other (specify) ☐

9. MORTGAGE TERMS:

Part 2 of this mortgage consists of (select one only):

(a) Prescribed Standard Mortgage Terms ☐

(b) Filed Standard Mortgage Terms ☒

(c) Express Mortgage Terms ☐

D F Number: MT160006

(annexed to this mortgage as Part 2)

A selection of (a) or (b) includes any additional or modified terms referred to in item 10 or in a schedule annexed to this mortgage.

10. ADDITIONAL OR MODIFIED TERMS:

This is a fixed rate closed mortgage

11. PRIOR ENCUMBRANCES PERMITTED BY LENDER:

N/A

12. EXECUTION(S): This mortgage charges the Borrower's interest in the land mortgaged as security for payment of all money due and performance of all obligations in accordance with the mortgage terms referred to in item 9 and the Borrower(s) and every other signatory agree(s) to be bound by, and acknowledge(s) receipt of a true copy of, those terms.

Officer Signature(s)

Execution Date

Borrower(s) Signature(s)

Y	M	D
16		

Barrister & Solicitor

Vancouver,

Tel:

Person A

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

LAND TITLE ACT
FORM D

EXECUTIONS CONTINUED

PAGE 3 of 3 pages

Officer Signature(s)

Execution Date

Transferor / Borrower / Party Signature(s)







Barrister & Solicitor



Vancouver BC

Tel: 

(as to both signatures)

Y	M	D
16		
16		

Person B as Guarantor

Person C as Guarantor

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

APPENDIX V

NEW WESTMINSTER LAND TITLE OFFICE

DECLARATION(S) ATTACHED

LAND TITLE ACT

FORM A (Section 185(1))

FREEHOLD TRANSFER Province of British Columbia

PAGE 1 OF 1 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒2a. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:
[PID] [LEGAL DESCRIPTION]STC? YES ☐

2b. MARKET VALUE: \$ 1 00

3. CONSIDERATION: \$ 1 00

4. TRANSFEROR(S):

(INC. NO.)

5. FREEHOLD ESTATE TRANSFERRED: Fee Simple

6. TRANSFEREE(S): (including occupation(s), postal address(es) and postal code(s))

Person C, Businesswoman

Vancouver

BC

7. EXECUTION(S): The transferor(s) accept(s) the above consideration and understand(s) that the instrument operates to transfer the freehold estate in the land described above to the transferee(s)

Officer Signature(s)

Barrister & Solicitor

Vancouver, BC.

Execution Date

Y

M

D

16

Transferor(s) Signature(s)

Print Name

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

**LAND TITLE ACT
FORM DECLARATION**

Related Document Number:

PAGE 1 OF 1 PAGES

Your electronic signature is a representation that: you are a subscriber as defined by the Land Title Act, RSBC 1996, C.250, the original or where designated by the Director, a true copy of the supporting document is in your possession and that the summary of the material facts set out in this declaration accurately reflects the material facts set out in each supporting document and if a supporting document is evidenced by an imaged copy the material facts of the supporting document are set out in the imaged copy of it attached. Each term used in the representation and declaration set out above is to be given the meaning ascribed to it in Part 10.1 of the Land Title Act.

I have in my possession a Form F, Certificate of Payment under the Strata Property Act, that is for the Strata lot(s) specified in the accompanying document or in the related document noted above. I confirm that the Form F is current for the purposes of Section 115(2) of the Strata Property Act and that it has been signed on behalf of the Strata Corporation. The Form F states that no money is owing to the strata corporation or where money is owing, that the provisions of Section 114, Strata Property Act, have been met or that arrangements satisfactory to the strata corporation have been made to pay the money owing.

NOTE:

A Declaration cannot be used to submit a request to the Registrar for the withdrawal of a document.

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT
FORM B (Section 225)

2016

MORTGAGE - PART 1 Province of British Columbia

PAGE 1 OF 3 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Barristers and Solicitors

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒

2. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:

[PID] [legal description]

STC? YES ☐

3. BORROWER(S) (MORTGAGOR(S)): (including postal address(es) and postal code(s))

Person C , Businesswoman

Vancouver

BC

4. LENDER(S) (MORTGAGEE(S)): (including occupation(s), postal address(es) and postal code(s))

CANADIAN IMPERIAL BANK OF COMMERCE

Toronto

ON

5. PAYMENT PROVISIONS:

(a) Principal Amount:

\$1,100,001.00

(b) Interest Rate:

See Schedule

(c) Interest Adjustment

Date: N/A

Y M D

(d) Interest Calculation Period:

See Schedule

(e) Payment Dates:

On Demand

(f) First Payment

Date: N/A

(g) Amount of each periodic payment:

On Demand

(h) Interest Act (Canada) Statement.

The equivalent rate of interest calculated half yearly not in advance is N/A % per annum.

(i) Last Payment

Date: N/A

(j) Assignment of Rents which the applicant wants registered?

YES ☐ NO ☒

If YES, page and paragraph number:

(k) Place of payment:

Postal Address In Item 4

(l) Balance Due

Date: On Demand

MORTGAGE – PART 1

PAGE 2 OF 3 PAGES

6. MORTGAGE contains floating charge on land ?
YES ☐ NO ☒

7. MORTGAGE secures a current or running account ?
YES ☒ NO ☐

8. INTEREST MORTGAGED:

Freehold ☒

Other (specify) ☐

9. MORTGAGE TERMS:

Part 2 of this mortgage consists of (select one only):

(a) Prescribed Standard Mortgage Terms ☐

(b) Filed Standard Mortgage Terms ☒

(c) Express Mortgage Terms ☐

D F Number: MT080113

(annexed to this mortgage as Part 2)

A selection of (a) or (b) includes any additional or modified terms referred to in item 10 or in a schedule annexed to this mortgage.

10. ADDITIONAL OR MODIFIED TERMS:

See Schedule

11. PRIOR ENCUMBRANCES PERMITTED BY LENDER:


N/A

12. EXECUTION(S): This mortgage charges the Borrower's interest in the land mortgaged as security for payment of all money due and performance of all obligations in accordance with the mortgage terms referred to in item 9 and the Borrower(s) and every other signatory agree(s) to be bound by, and acknowledge(s) receipt of a true copy of, those terms.

Officer Signature(s)


Execution Date

Borrower(s) Signature(s)


Barrister & Solicitor

Vancouver, BC

Tel: 

Y	M	D
16		

Person C

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

Land Title Act
Form E
SCHEDULE

PAGE 3 OF 3 PAGES

Enter the required information in the same order as the information must appear on the Freehold Transfer form, Mortgage form, or General Instrument form.

11954-2014/02
British Columbia

5. PAYMENT PROVISIONS:

- (b) **INTEREST RATE:** The interest rate is a variable rate per year equal to the CIBC Prime Rate plus Six percent (6.00%) per annum, calculated and compounded monthly, with interest on overdue interest at the same rate. The interest rate will change automatically, without notice, whenever the CIBC Prime Rate changes.

(d) **INTEREST CALCULATION PERIOD:**

Despite the interest rate noted above, the interest rate you will pay on any part of the Debt will be the interest rate specified in the relevant Agreement which relates to that part of the Debt. Interest will be calculated as set out in the relevant Agreement or, if not set out, will be calculated and compounded monthly, with interest on overdue interest at the same rate. If no interest rate is specified in the relevant Agreement, you will pay interest on such part of the Debt at the interest rate.

Interest is payable both before and after demand and both before and after default and judgment.

10. ADDITIONAL OR MODIFIED TERMS:

This schedule forms part of a mortgage made pursuant to the *Land Title Act* and regulations thereunder. The following terms when used in this schedule have the meanings ascribed to them in the set of Standard Mortgage Terms referred to in the Form B Mortgage - Part 1 of which this schedule forms part:

Agreement(s)
Debt
CIBC Prime Rate

APPENDIX W

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT
FORM B (Section 225)

-2016

MORTGAGE - PART 1 Province of British Columbia

PAGE 1 OF 3 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Barrister & Solicitor

Vancouver

BC

Document Fees: \$71.58

Deduct LTSA Fees? Yes ☒

2. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:

[PID] [legal description]

STC? YES ☐

3. BORROWER(S) (MORTGAGOR(S)): (including postal address(es) and postal code(s))

Person C STUDENT

Vancouver

BC

Canada

4. LENDER(S) (MORTGAGEE(S)): (including occupation(s), postal address(es) and postal code(s))

CANADIAN IMPERIAL BANK OF COMMERCE

Vancouver

BC

5. PAYMENT PROVISIONS:

(a) Principal Amount:

\$7,000,000.00

(b) Interest Rate:

2.190% per annum

(c) Interest Adjustment

Date:

Y

M

D

16

(d) Interest Calculation Period:

compounded twice per year

(e) Payment Dates:

1st day of each and every month

(f) First Payment

Date:

17

(g) Amount of each periodic payment:

\$30,287.30

(h) Interest Act (Canada) Statement.

The equivalent rate of interest calculated half yearly not in advance is N/A % per annum.

(i) Last Payment

Date:

18

(j) Assignment of Rents which the applicant wants registered ?

YES ☐ NO ☒

If YES, page and paragraph number:

(k) Place of payment:

Postal Address In Item 4

(l) Balance Due

Date:

18

MORTGAGE – PART 1

PAGE 2 OF 3 PAGES

6. MORTGAGE contains floating charge on land ?
 YES ☐ NO ☒

7. MORTGAGE secures a current or running account ?
 YES ☐ NO ☒

8. INTEREST MORTGAGED:

Freehold ☒

Other (specify) ☐

9. MORTGAGE TERMS:

Part 2 of this mortgage consists of (select one only):

(a) Prescribed Standard Mortgage Terms ☐

(b) Filed Standard Mortgage Terms ☒

(c) Express Mortgage Terms ☐

D F Number: MT160006

(annexed to this mortgage as Part 2)

A selection of (a) or (b) includes any additional or modified terms referred to in item 10 or in a schedule annexed to this mortgage.

10. ADDITIONAL OR MODIFIED TERMS:

This is a fixed rate closed mortgage

11. PRIOR ENCUMBRANCES PERMITTED BY LENDER:

Agreement No. in favour of Et Al

Easement No. in favour of

12. EXECUTION(S): This mortgage charges the Borrower's interest in the land mortgaged as security for payment of all money due and performance of all obligations in accordance with the mortgage terms referred to in item 9 and the Borrower(s) and every other signatory agree(s) to be bound by, and acknowledge(s) receipt of a true copy of, those terms.

Officer Signature(s)

Execution Date

Borrower(s) Signature(s)

Barrister & Solicitor

Vancouver, BC

Y	M	D
16		

Person C

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

EXECUTIONS CONTINUED

PAGE 3 of 3 pages

Transferor / Borrower / Party Signature(s)

Person B as Guarantor

YOUR SIGNATURE CONSTITUTES A REPRESENTATION THAT YOU ARE A SOLICITOR, NOTARY PUBLIC OR OTHER PERSON AUTHORIZED BY THE *EVIDENCE ACT*, R.S.B.C. 1996, c.124, TO TAKE AFFIDAVITS FOR USE IN BRITISH COLUMBIA AND CERTIFIES THE MATTERS SET OUT IN PART 5 OF THE *LAND TITLE ACT* AS THEY PERTAIN TO THE EXECUTION OF THIS INSTRUMENT.

APPENDIX X

NEW WESTMINSTER LAND TITLE OFFICE

LAND TITLE ACT
FORM B (Section 225)

2019

MORTGAGE - PART 1 Province of British Columbia

PAGE 1 OF 4 PAGES

Your electronic signature is a representation that you are a subscriber as defined by the Land Title Act, RSBC 1996 c.250, and that you have applied your electronic signature in accordance with Section 168.3, and a true copy, or a copy of that true copy, is in your possession.

1. APPLICATION: (Name, address, phone number of applicant, applicant's solicitor or agent)

Vancouver

BC

Document Fees: \$74.16

Deduct LTSA Fees? Yes ☒

2. PARCEL IDENTIFIER AND LEGAL DESCRIPTION OF LAND:

[PID]

[legal description]

STC?

YES ☐

3. BORROWER(S) (MORTGAGOR(S)): (including postal address(es) and postal code(s))

Person C , STUDENT

VANCOUVER

BRITISH COLUMBIA

CANADA

4. LENDER(S) (MORTGAGEE(S)): (including occupation(s), postal address(es) and postal code(s))

CANADIAN IMPERIAL BANK OF COMMERCE

VANCOUVER

BRITISH COLUMBIA

CANADA

5. PAYMENT PROVISIONS:

(a) Principal Amount:

\$3,000,000.00

(b) Interest Rate:

See Schedule

(c) Interest Adjustment

Date: N/A

Y

M

D

(d) Interest Calculation Period:

See Schedule

(e) Payment Dates:

On Demand

(f) First Payment

Date: N/A

(g) Amount of each periodic payment:

N/A

(h) *Interest Act* (Canada) Statement.
The equivalent rate of interest calculated
half yearly not in advance
is N/A % per annum.

(i) Last Payment

Date: N/A

(j) Assignment of Rents which the
applicant wants registered ?

YES ☐ NO ☒

If YES, page and paragraph number:

(k) Place of payment:

Postal Address in Item 4

(l) Balance Due

Date: On Demand

MORTGAGE – PART 1

PAGE 2 OF 4 PAGES

6. MORTGAGE contains floating charge on land ?
 YES ☐ NO ☒

7. MORTGAGE secures a current or running account ?
 YES ☒ NO ☐

8. INTEREST MORTGAGED:

Fee Simple ☒

Other (specify) ☐

9. MORTGAGE TERMS:

Part 2 of this mortgage consists of (select one only):

(a) Prescribed Standard Mortgage Terms ☐

(b) Filed Standard Mortgage Terms ☒

(c) Express Mortgage Terms ☐

D F Number: MT180015

(annexed to this mortgage as Part 2)

A selection of (a) or (b) includes any additional or modified terms referred to in item 10 or in a schedule annexed to this mortgage.

10. ADDITIONAL OR MODIFIED TERMS:

SEE SCHEDULE

11. PRIOR ENCUMBRANCES PERMITTED BY LENDER:

Mortgage registered under [REDACTED] in favour of [REDACTED]

12. EXECUTION(S): This mortgage charges the Borrower's interest in the land mortgaged as security for payment of all money due and performance of all obligations in accordance with the mortgage terms referred to in item 9 and the Borrower(s) and every other signatory agree(s) to be bound by, and acknowledge(s) receipt of a true copy of, those terms.

Officer Signature(s)

[REDACTED]
 Notary Public

[REDACTED]
 Vancouver, BC [REDACTED]

Execution Date

Y	M	D
19	[REDACTED]	[REDACTED]

Borrower(s) Signature(s)

[REDACTED]
 Person C

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

LAND TITLE ACT
FORM D

EXECUTIONS CONTINUED

PAGE 3 of 4 pages

Officer Signature(s)

Execution Date

Transferor / Borrower / Party Signature(s)

[REDACTED]

Notary Public

[REDACTED]

Vancouver, BC [REDACTED]

Y	M	D
19	[REDACTED]	[REDACTED]
19	[REDACTED]	[REDACTED]

Person B
GUARANTOR

[REDACTED]

Notary Public

[REDACTED]

Vancouver, BC [REDACTED]

Person A
GUARANTOR

OFFICER CERTIFICATION:

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

**LAND TITLE ACT
FORM E****SCHEDULE**

PAGE 4 OF 4 PAGES

ENTER THE REQUIRED INFORMATION IN THE SAME ORDER AS THE INFORMATION MUST APPEAR ON THE FREEHOLD TRANSFER FORM, MORTGAGE FORM, OR GENERAL INSTRUMENT FORM.

**5. PAYMENT PROVISIONS INTEREST RATE
(Box 5(b))**

The interest rate is a variable rate per year equal to the CIBC Prime Rate plus six percent (6%) per annum, calculated and compounded monthly, with interest on overdue interest at the same rate. The interest rate will change automatically, without notice, whenever the CIBC Prime Rate changes.

**INTEREST CALCULATION PERIOD
(Box 5(d))**

Despite the interest rate noted above, the interest rate you will pay on any part of the Debt will be the interest rate specified in the relevant Agreement which relates to that part of the Debt. Interest will be calculated as set out in the relevant Agreement or, if not set out, will be calculated and compounded monthly, with interest on overdue interest at the same rate. If no interest rate is specified in the relevant Agreement, you will pay interest on such part of the Debt at the interest rate. Interest is payable both before and after demand and both before and after default and judgment.

**10. ADDITIONAL OR MODIFIED TERMS
(Box 10)**

This schedule forms part of a mortgage made pursuant to the Land Title Act and regulations thereunder. The following terms when used in this schedule have the meanings ascribed to them in the set of Standard Mortgage Terms referred to in the Form B Mortgage – Part 1 of which this schedule forms part:

Agreement(s)
Debt
CIBC Prime Rate

END OF DOCUMENT

APPENDIX Y

DECLARATION(S) ATTACHED



Land Title Act
Freehold Transfer
Province of British Columbia

NEW WESTMINSTER LAND TITLE OFFICE

2021-05-08 12:57:00

1. Application

Notary Public Inc Burnaby BC

File Number:

2. Description of Land

PID/Plan Number Legal Description

Market Value

\$4,000.00

3. Consideration

\$4,000.00

4. Transferor(s)

Person A

Person B

5. Freehold Estate Transferred

FEE SIMPLE

6. Transferee(s)

ARCHITECT AND INTERIOR DESIGNER VANCOUVER BC

7. Execution(s)

The transferor(s) accept(s) the above consideration and understand(s) that the instrument operates to transfer the freehold estate in the land described above to the transferee(s).

Witnessing Officer Signature

Execution Date

Transferor Signature(s)

Barrister & Solicitor

Vancouver BC

YYYY-MM-DD

2021-05-08

Person A



Land Title Act
Freehold Transfer
Province of British Columbia

Person B

Officer Certification

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

Electronic Signature

Your electronic signature is a representation that you are a designate authorized to certify this document under section 168.4 of the *Land Title Act*, R.S.B.C. 1996 c.250, that you certify this document under section 168.41(4) of the act, and that an execution copy, or a true copy of that execution copy, is in your possession.

Digitally signed by

Date: 2021-
-07:00

**LAND TITLE ACT
FORM DECLARATION**

Related Document Number: [REDACTED]

PAGE 1 OF 3 PAGES

Your electronic signature is a representation that you are a designate authorized to certify this application under section 168.4 of the *Land Title Act*, RSBC 1996, c.250, that you certify this application under section 168.43(3) of the act, and that the supporting document or a true copy of the supporting document, if a true copy is allowed under an e-filing direction, is in your possession.

Digitally signed by [REDACTED]

Date: 2021-[REDACTED]

This is to correct the defect notice on Form A registered under [REDACTED]

I made a typo in execution date in Form A. It should be [REDACTED] 2021 (not [REDACTED] 2021). I enclose a copy of executed Form A for your reference.

Thank you.

[REDACTED]
Notary Public

NOTE:

A Declaration cannot be used to submit a request to the Registrar for the withdrawal of a document.

Fee Collected for Document: \$14.20



Land Title Act

Freehold Transfer

Province of British Columbia

1. Application

Burnaby BC

File Number:

2. Description of Land

PID/Plan Number

Legal Description

Market Value

\$4,000.00

3. Consideration

\$4,000.00

4. Transferor(s)

Person A

Person B

5. Freehold Estate Transferred

FEE SIMPLE

6. Transferee(s)

ARCHITECT AND INTERIOR DESIGNER

VANCOUVER BC

7. Execution(s)

The transferor(s) accept(s) the above consideration and understand(s) that the instrument operates to transfer the freehold estate in the land described above to the transferee(s).

Witnessing Officer Signature

Execution Date

Transferor Signature(s)

YYYY-MM-DD

2021

Person A

Person A

Barrister & Solicitor

Vancouver, B.C.



Land Title Act

Freehold Transfer

Province of British Columbia

[REDACTED]

[REDACTED]

Barrister & Solicitor

[REDACTED]

Vancouver, B.C.**Person B**

Person B

Officer Certification

Your signature constitutes a representation that you are a solicitor, notary public or other person authorized by the *Evidence Act*, R.S.B.C. 1996, c.124, to take affidavits for use in British Columbia and certifies the matters set out in Part 5 of the *Land Title Act* as they pertain to the execution of this instrument.

Electronic Signature

Your electronic signature is a representation that you are a designate authorized to certify this document under section 168.4 of the *Land Title Act*, RSBC 1996 c.250, that you certify this document under section 168.41(4) of the act, and that an execution copy, or a true copy of that execution copy, is in your possession.