

## Executive Summary:

This disclosure contains transactions involving SUSPECT A and his law firm LAW FIRM X, as well as associated individuals SUSPECT B, SUSPECT C, SUSPECT D, and entity 1234567 PROVINCE INC.

LAW FIRM X specializes in multiple types of legal services.

Three different financial institutions submitted STRs<sup>1</sup> on the financial activity involving LAW FIRM X.

Over the span of approximately six months LAW FIRM X was the beneficiary of EFTs ordered by entities listed at addresses in COUNTRY A and COUNTRY B totaling over 50,000,000.00 CAD.

The EFTs were reported in an STR due to the reporting entity's suspicions regarding a pattern of activity and unknown connection of the entities listed at addresses in COUNTRY A to Canada. The grounds for suspicion state:

- "...It is suspicious that COMPANY F, would remit multiple large EFTs (using more than one financial institution in COUNTRY A) within a relatively short time frame, when one or two transactions could have been conducted. This raises concerns that the use of multiple EFTs is an attempt to avoid reporting thresholds and/or scrutiny in one or more jurisdictions..."<sup>2</sup>
- "...The sending party, COMPANY A, does not have any apparent ties to Canada..."
- "...The business relationship between these companies and LAW FIRM X appears unclear as LAW FIRM X, who also holds an account with MAJOR BANK X, specializes in [various legal services]..."

During a similar time frame, LAW FIRM X issued cheques totaling over 34,000,000.00 CAD to the benefit of COMPANY B (an operating name for COMPANY C). An STR indicates that the cheques were issued to COMPANY B) shortly after receiving the EFTs from COMPANY D. (MAJOR COUNTRY B)

The Reporting Entity's grounds for suspicion found relevant by FINTRAC state:

- "...The transfer of funds to COMPANY B occurs either the same day or a day after receiving funds from COMPANY D..."

SUSPECT C and SUSPECT D are listed as Directors of 1234567 PROVINCE INC.

1234567 PROVINCE INC. was the beneficiary of cheques issued by LAW FIRM X, totaling over 3,000,000.00 CAD, and was also the beneficiary of EFTs ordered by COMPANY A, COMPANY D, and COMPANY E, totaling over 4,000,000.00 CAD.

---

<sup>1</sup> **Money Laundering Indicator:** Multiple entities reporting suspicions

<sup>2</sup> **Money Laundering Indicator:** Reporting entity expressed suspicions regarding a pattern of financial activity