

## CURRICULUM VITAE

**Melanie D. PADDON, Retired, Reg. No. #37557**

Current as of 2020-01-08

### FORMAL EDUCATION

My formal education relates to a forensic accounting diploma while in the RCMP Integrated Proceeds of Crime Section. I undertook French Language Training through the OCPD program with a view to becoming bilingual during my service with the RCMP. I have successfully completed and received diplomas in the following courses:

Accounting 1115, Langara College, Vancouver, B.C., 1999  
Accounting 2215, Langara College, Vancouver, B.C., 1999  
Business Law 2285, Langara College, Vancouver, B.C., 2000  
Communications in Business 1118, Langara College, Vancouver, B.C., 2000  
French Language Training Levels 1 - 12, Air Canada, Richmond, B.C., 2005  
French Language Training Intermediate Levels 1 - 6, Richmond, B.C., 2006  
Intermediate French Level 1, Alliance Francaise, Vancouver, B.C., 2006

### TRAINING/TEACHING/COLLEGE COURSES and CONFERENCES

Mexican Drug Investigations Cartel Workshop  
2018-03-01/02, Ottawa Ontario

Financial Crime Investigator's Course  
2017-11-22, Pacific Regional Training Centre (lecturing)

Major Case Management Course – Course Development/Lead Facilitator to the Philippine National Police and the National Bureau of Investigation  
2017-11-06 to 2017-11-17  
Camp Crame, Manila, Philippines

Justice Institute of British Columbia  
Proceeds of Crime Course – Course Development / Delivery  
2016-11-07/10 New Westminster, B.C.  
2017-04-10/13 Victoria, B.C.  
2017-10-24/27 New Westminster, B.C.  
2018-04-09/12 New Westminster, B.C.  
2018-11-04/08 Victoria, B.C.  
2019-04-08/11 New Westminster, B.C.  
2019-10-15/18 Victoria, B.C.

National Proceeds of Crime Course – Course Development Lead Facilitator on Pilot  
2016-11-14/18 Ottawa, Ont.

Federal Policing – Money Laundering Focus Group – Course Development of Proceeds of Crime  
Course (Pilot)  
2016-06-21/23 Ottawa, Ont.

ACAMS 21<sup>st</sup> Annual International AML & Financial Crime Conference  
2016-04-11/13 Hollywood, Florida, USA

National Expert Witness Course (Facilitator)  
2015-02-16/20 Ottawa, Ont.

Terrorism Interviewing Seminar  
2015-01-29 Surrey, B.C.

National Expert Witness Course (Facilitator)  
2013-12-09/13 Ottawa, Ont.

Major Case Management: Team Commander  
2013-10-10, Chilliwack, B.C.

Courses from 1992-2011 are available upon request.

### **POLICING EXPERIENCE – Previous and Current Postings**

I was a regular member of the Royal Canadian Mounted Police with 36.5 years and retired in June 2018. I was consistently in the role of Primary Investigator in long term money laundering / proceeds of crime projects. I am an expert in the field of money laundering, proceeds of crime and cash bundling with 27 years of experience in the field.

Historically, my first posting was Russell, Manitoba from July 1982 to March 1984 as a general duty and traffic duty member. The detachment area was a farming community comprised of 10 smaller communities and including two First Nations Reserves within a 100 km radius.

I was stationed in Chetwynd, B.C. from April 1984 to November 1985 as a general duty member. The detachment area was a logging and mining community in Northern B.C. that involved *Criminal Code* offences as well as Federal and Provincial Statutes.

I was stationed in North Vancouver, B.C. from December 1985 to May 1992 as a general duty member and GIS member in a large urban centre. There was a cross section of crime that I investigated, including complex sexual assaults, murders, Break and Enters, drug and property related offences.

I was stationed in Anti-Drug Profiteering from its inception in May 1992 which transformed into the Integrated Proceeds of Crime Section in November 2003. I investigated complex lengthy proceeds of crime and money laundering investigations derived drug importations and trafficking. Many of these projects were international in scope. I investigated the financial component of these projects.

I promoted into the position of "E" Division Coordinator for Electronic Major Case Management from December 2003 to August 2005 and was responsible for the supervision of 14 ISAS (formerly Information Administrators) across the province. I worked with the ISASs in initial file assessments, E&R set up and management of complex investigations under the Major Case Management Model.

I returned to IPOC as co-primary investigator on a large Joint Forces Operation with Vancouver Drug Section from August 2005 to May 2006. The investigation was international in nature and involved an organized crime group facilitating the exportation of marijuana and money laundering. This move was an opportunity to gain experience in a key role in preparation for the Team Commander's Accreditation.

I held the position of IPOC case consultant and expert witness co-ordinator for British Columbia from 2006 to 2012. I was in the Acting S/Sgt. NCO i/c Operations for a year overseeing two teams as well as the Kelowna IPOC office. All three teams investigate proceeds of crime, money laundering and PCMLTFA offences.

In 2013, Integrated Proceeds of Crime disbanded and became Federal and Serious and Organized Crime (FSOC), "E" Division in the position of Team Leader, Group 6. This section investigated large scale drug trafficking/importation offences and proceeds of crime/ money laundering at the project level.

In December 2014 I transferred to FSOC Group 1 and held the position of NCO in charge of the Proceeds of Crime Unit. This position oversaw the Asset Forfeiture Unit and is directly linked to the Civil Forfeiture Office, responsible for referral of assets through the Civil Courts. I mentored and provided guidance to investigators in the field as well as completing expert opinion reports across the province.

In August 2014 I was seconded to run a Financial Team on Project SPELEO, a National Priority file investigating Terrorist Financing and Money Laundering. I supervised and mentored a small team with respect to the financial component of the investigation.

In December 2014 I returned to Financial Integrity and was deployed as Primary Investigator in a massive money laundering investigation commencing February 2015 until September 2017 known as Project EPIRATE.

In June 2018 I retired and took a contract position with the Combined Forces Special Enforcement Team specifically the Joint Illegal Gambling Investigations Team assisting in investigations into gambling and money laundering in the casinos and illegal gaming houses.

### **INVESTIGATIONAL EXPERIENCE relating to field of expertise**

#### **IPOC “E” Division - Joint Forces Operation with Vancouver Drug Section**

From 2005 – 2006, I was in the role of Co-primary on a JFO involving a team of 20 investigators from IPOC and Drug Sections as well as support staff. I was responsible for supervising a team of 10 IPOC members and educating members in the Proceeds of Crime component of large scale drug importations.

#### **Coordinator of Major Case Management (“E” Division)**

As the Coordinator of “E” Div. Electronic MCM, I was in the position from Dec. 2003-2005 in the role of supervisor for 14 ISAS both federal and provincial positions across the province. I had oversight of the electronic MCM on E & R, the database used to manage major cases. I participated in the National standardization and implementation of software on E & R and Supertext. At the time, MCM was in the process of centralizing and I ensured the following goals were met during my tenure:

- the ongoing training of Information Administrators / members in the field;
- lecturing to local detachments and sections on the use of major case management;
- setting up the centralized model while working with Informatics, hiring support staff, reclassifying MCM positions, re-writing standardized exams, interviews, locating and physically moving the section to a central location;
- budget management through preparing two Business Plans to support the centralization of MCM to ensure there the model was successful with support staff in place, adequate training and standard protocols were being followed. The initiative affected provincial and federal sections within the division. The result being better service to members in the field, a better disclosure package for the courts and better investigative protocols would lead to a safer community.

#### **Vancouver Integrated Proceeds of Crime Section (IPOC)**

##### **Federal and Serious and Organized Crime (FSOC) – Group 6 Team Lead and Group 1 Team Lead, Financial Integrity**

I was both a supervisor and investigator in IPOC and FSOC. In this position my experience includes:

- conducting several long term and complex large scale investigations using the Major Case Management Model to effectively co-ordinate these investigations;

- co-ordinating files involving a team of 15 members working under my supervision as well as support staff while I manage large long term projects involving agents, partnering outside agencies, wiretap, money movements, undercover operations, evidence gathering and court brief building in relation to money laundering offences both Nationally and Internationally;
- I have conducted international investigations and provided evidence to foreign police agencies under the authority of the Mutual Legal Assistance Treaty. I have travelled to Hong Kong on several occasions and worked with the Hong Kong Police as well as the People's Republic of China Police and have provided exhibits and testified in the High Court in Hong Kong on an international drug/money laundering investigation between Hong Kong, Thailand and Canada;
- I have provided evidence to the London Metropolitan Police which I collected in Canada, seized under Canadian law, prepared Canada Evidence Act Affidavits, which supported admissibility of that evidence through both the Canadian and British Court System resulting from a drug trafficking project in the U.K.
- I have prepared approximately 150 Affidavits in the form of Informations to Obtain Search Warrants in three provinces, Tax Affidavits in Supreme Court, Affidavits to further retain exhibits, Management Orders, Orders backing Authorizations to Intercept Wire, as well as collecting documentary evidence to support a proceeds of crime investigation;
- I have been involved in investigations involving the large seizures of money and assets as proceeds of crime. I have made the initial seizure, conducted the investigation and the court has forfeited the funds, the smallest forfeiture being \$33,000 and the largest forfeiture being \$450,000;
- I have conducted complex investigations involving the intermingling of money, property, companies and other assets in both Canada and Internationally;
- I have interviewed inmates in federal penitentiaries in the USA as well as China and I have successfully obtained statements containing incriminating evidence;
- I have prepared court briefs containing 70 binder of documents and 120 pages of narrative on a three year investigation involving the intermingling of drug money through properties and businesses. The illegitimate funds were used to purchase 7 properties, maintain 11 companies and a cash seizure. I searched locations including banks, Chartered Accountant's, brokerage firms and Notary Publics' offices;
- I am very familiar with the methods of packaging used by drug traffickers to conceal their drugs and money. I am also familiar with the places in which traffickers attempt

to conceal their funds whether on their person, in their vehicles or in their residences or businesses;

- I am familiar with methods used by international traffickers to conceal their assets and money by following trends, identifying indicators of money laundering such as placement through smurfing , layering and integration into the banking system. I am familiar with Informal Value Transfer Systems on an international level and have identified patterns and provided expert evidence based on those patterns. I have experienced nominee ownership, loan back schemes, offshore banking, shell companies, and intermingling of funds in legitimate businesses while working with forensic accountants to identify the beneficial owner of the funds and their assets.
- I have completed the Effective Presentation Course and lecture on a regular basis to groups from 10 people to 120 people on the proceeds of crime particularly gather evidence, profiling suspects, conducting investigations, restraining assets, proving the elements of money laundering/proceeds of crime offences and the forfeiture of funds and assets.

### **POSITION prior to retirement**

In September 2015 I took the role of Primary Investigation on a large scale complex money laundering investigation that was international in scope. The project was 2 years in duration and I worked with a team of 33 investigators in an effort to combat money laundering, illegal gambling within and outside the lower mainland casinos. The primary target was using an illegal money service business to laundering funds derived from extortion, loan sharking, drug trafficking and other criminal offences. Evidence revealed that \$23.9 million was laundered through the MSB between January and October 2015. The investigation has resulted in seizure of \$7 million cash, restraint of properties and vehicles and charges have been laid.

I have assisted in the development and facilitation of the Proceeds of Crime Course on a National level that was presented to investigators and analysts in the field. I was the team lead on the Pilot Project in Ottawa.

In September 2017 I was provided the opportunity through Ottawa to take the Team Lead in teaching the Major Case Management Course to the Philippine National Police and the National Bureau of Investigations at Camp Crame, Manila, Philippines.

### **LECTURING – Historical to Present**

Pipeline Convoy Course – A three day course encompassing vehicle searches at roadside and seizure of contraband and money at the scene, particularly large cash seizures.

Drug Investigative Techniques Course - This course is a basic drug course providing knowledge in relation to drugs, cash seizures and investigative techniques used in accordance with the CDSA and Proceeds of Crime legislation. I participated as lecturer between 2001-2010.

U.S. Customs / DEA / RCMP Project North Star – Nov. 5, 2001, Vancouver, B.C. – An international symposium covering US and Canadian law in relation to drug trends, money laundering techniques, and operational issues between the two countries. The audience had 104 participants, mostly in management or in a supervisory role.

Integrated Proceeds of Crime - Project “ELDEN”

In 2001 I was in the role of file co-ordinator on a JFO relating to an Organized Crime Group trafficking in drugs and laundering the proceeds in Canada. The team was both municipal and RCMP members from “C”, “E” and “O” Divisions and spanned 3 years.

Major Case Management Workshops

I have provided numerous lectures to Detachment members, drug and financial sections on the principles of major case management as per the MCM Model.

Expert Witness Workshops

Commencing 2006 I have lectured, developed and facilitated expert witness workshops across the country between 2006 to 2014 and am a resource for members requiring expert evidence to support their investigations.

Courses, Workshops and Lectures in the field of Proceeds of Crime and Money Laundering

In 2008 I participated in the redesign of the Advanced Proceeds of Crime Course and later the Basic Proceeds of Crime Course

In 2008, 2009, 2016 and 2017 I lectured on the Financial Investigative Techniques Course. The course encompasses all aspects of financial crime and the follow up investigation.

In 2013 I lectured on the Organized Crime Course on Proceeds of Crime, Money Laundering and how it relates to Organized Crime Groups.

Justice Institute of British Columbia – Proceeds of Crime Course

In 2016 I was approached by the JIBC to develop of Proceeds of Crime course available to municipal police forces/services across the province. I developed and presented the 4 day course commencing September 2016 and continue to teach the course twice a year. The course is open to investigators from municipal police forces, the RCMP and other law enforcement agencies.

Major Case Management – Camp Crame, Manila, Philippines

In November 2017 I was asked to take the lead role in the facilitation of the Major Case Management Course in Manila, Philippines. I worked with two other members to develop the course and I had a team of two members assist in facilitation. The course ran from November 6-17, 2017 and I taught the principles of Major Case Management to the Philippine National Police and the National Crime Bureau.

### Expert Qualification

On August 6<sup>th</sup>, 2003 I was qualified as an expert in the packaging and movement of money before the honourable Judge E. Jane McKINNON in Provincial Court, Richmond, B.C. File 2000-11912 (Richmond Det.) and 2000E-3303 (IPOC) refers.

I testified on March 3<sup>rd</sup>, 2011 in Nelson, B.C. I was qualified as an expert in the packaging and movement of money before the Honourable Judge MROZINSKI in the Provincial Court, Nelson, B.C. File 2009-5942 (Nelson IRSU) refers.

In 2009, I provided an expert opinion in the Provincial Courts, Victoria, B.C. resulting from a project undertaken by the Island District Drug Section. The main target, Dax WEIGLAND, was arrested for drug trafficking and 29 pounds of marihuana seized from his vehicle. His residence was searched and \$158,000 was seized as proceeds of crime.

On September 6<sup>th</sup>, 2013 Judge HARVEY ordered forfeiture of the funds as the accused abandoned his claim.

On May 23, 2013 a local drug trafficker, Thomas DILL, was arrested in possession of \$3404.00 and charged with drug trafficking. On August 9<sup>th</sup>, 2013, DILL was convicted and \$3000 was forfeited. Crown advised the forfeiture was based on the Judge's review of my opinion evidence.

I continue to provide expert opinions to members upon request.

### Current Position

I have been employed by the Combined Forces Special Enforcement Unit – BC, specifically the Joint Illegal Gaming Investigation Team commencing June 2018. I was tasked with assisting and mentoring members in the nuances of proceeds of crime and money laundering investigations.

I have been in the file coordinator and investigator roles on Project ATHENA resulting from Peter GERMAN's recommendations identified in the gaming sector. The project involved developing private/public partnerships with stakeholders including the banks, BCLC, GPEB, ICBC, CBSA and CRA in order to share information lawfully between agencies. This task required me to lecture to service providers at the casinos, consult with the banks and BCLC regularly in an effort to identify gamblers passing drafts purchased on the black market which was then placed in their player gaming account for use at the casinos. Many of the drafts were



purchased through nominee bank accounts with no supporting documentation or source of funds. Project ATHENA has now become a national priority with FINTRAC engagement and both the real estate and luxury vehicle sectors.

I have also been tasked with providing assessments on money laundering files that involve gangs, weapons and cash seizures.

I am also assisting with the CGIIG (Crime Guns Intelligence Group) initiative with the provincial government.