

**FINANCIAL INSTITUTIONS COMMISSION OF BRITISH COLUMBIA (“FICOM”)**

**INVESTIGATIVE SERVICES**

**Grant Brian CURTIS:**

**Review of Sample of Mortgage Transactions**

**CASE FILE #INV11.343.48836**

**INTRODUCTION:**

In November 2010, A FICOM investigation was conducted into whether Eathan SKWIRA (“SKWIRA”) was conducting unregistered mortgage brokering activities in contravention of the *Mortgage Brokers Act*. This matter arose from information provided by the Vancouver Police Department (“VPD”), who found mortgage related documents in course of executing a search warrant on SKWIRA’s residence. SKWIRA was living at the home of Grant CURTIS (“CURTIS”), who is a registered sub-mortgage broker. Information obtained in this investigation showed SKWIRA purportedly referred a number of mortgage deals to CURTIS.

Although there was no evidence to show SKWIRA was himself acting as a mortgage broker, the mortgages files purportedly referred by SKWIRA to CURTIS contained a range of elements that appeared unusual, including the relationship of SKWIRA to CURTIS as a paid referral source. Typically, the type of person who would refer multiple mortgage deals to a broker would be someone in a complementary business such as real estate or other financial services, where a pre-existing client relationship exists, or a person who is a member of a formal entity, such as a professional association referring members.

Based on the presence of these unusual aspects, a sample of mortgage transactions handled by CURTIS was obtained and reviewed from lenders. During the review, several files appeared to contain documents with indications they may not be genuine, and in a number of cases, involve borrowers who appear to be associated to organized crime. Other files involve rapid property turnover, and purported rental properties with what appear to be fictitious tenancy agreements. DLC payroll records, as well as some mortgage application documents, indicate that an unusually large number of CURTIS deals involve the payment of referral fees to several individuals, including SKWIRA. From a broad perspective, and considering all of the unusual aspects of these mortgage transactions as a whole, investigators hypothesized that these questionable transactions are not mere frauds (e.g. to assist unqualified buyers), but rather more likely to facilitate a network of organized criminal activity, including money laundering and purchasing homes for criminal purposes. Notably, CURTIS recently purchased a property on 0 Avenue in Surrey, which is adjacent to the US border.

Based on this review it was determined that it will be difficult to prove misconduct within the scope of FICOM’s regulatory authority and capabilities, and even if some breach of the Mortgage Brokers Act was found, the potential outcomes would not be sufficient to revoke CURTIS’ mortgage broker registration. Further, the hypothesis that many of these mortgage transactions may be facilitating larger criminal activities, led to a conclusion that this matter is more appropriately a police concern and taking

substantive investigative and regulatory steps would unduly alert CURTIS to the intelligence gathered and be counter-productive to effective police action.

CURTIS is likely aware of the inquiry into SKWIRA, however the current review of CURTIS's files was conducted silently. Two lenders were approached to produce mortgage files to FICOM, and were told it was a mere review based on information from another investigation, and there were no particular concerns with CURTIS himself. Both were instructed to not advise CURTIS of FICOM's interest. Furthermore, FICOM investigators did not contact CURTIS or any other party – the review was strictly of existing lender files and research.

The following paper outlines this review including information uncovered and the connections between various individuals, addresses and business entities. The attached spreadsheet summarizes each particular mortgage file reviewed and highlights the unusual and/or interesting aspects of each.

**FICOM REGISTRATION FILE INFORMATION FOR CURTIS:**

**DOB:** [REDACTED] (Stated on application for registration as a sub-mortgage broker)

**PHONE NO.** [REDACTED]

**SPONSORING MORTGAGE BROKER FIRM:** Dominion Lending Centres Mountain View Ltd. ("DLC")

**REGISTERED SUB-MORTGAGE BROKER:** July 11, 2008 – present

**PREVIOUSLY LICENSED WITH THE INSURANCE COUNCIL OF BC:** March 6, 1996 – March 3, 1997

**RESIDENTIAL ADDRESS:**

[REDACTED] – same as BC Driver's License ("BCDL")

- CURTIS is registered on title as owner of [REDACTED]
- Mortgage "Form B" document for [REDACTED] lists [REDACTED] of [REDACTED], as a Covenantor (guarantor for the loan)
- Land Title Office ("LTO") records show CURTIS previously co-owned [REDACTED] with [REDACTED]
- LTO shows CURTIS' residential address as being [REDACTED]
- LTO shows [REDACTED], is owned by [REDACTED] / [REDACTED] (also listed as residential address)

**MORTGAGE BROKER BUSINESS ADDRESSES PER FICOM RECORDS:**

All are with the brokerage Dominion Lending Centres Mountain View Ltd. ("DLC")

- 104 – 20130 Lougheed Hwy, Maple Ridge
  - April 2011 - present
- 104 – 14770 – 64<sup>th</sup> Ave, Surrey, BC
  - October 2010 – April 2011
- 223 – 6820 188<sup>th</sup> Street, Surrey, BC (per May 2010 reg)
  - May 2010 – October 2010
- 219 – 6820 188<sup>th</sup> Avenue, Langley, BC
  - per January 2010 registration renewal application
- 104 – 20130 Lougheed Hwy, Maple Ridge
  - July 2008 – January 2010

**SUMMARY OF PROPERTIES CURRENTLY OWNED BY CURTIS PER LTO:**

<i>Property Address / PID</i>	<i>Registered Owner</i>	<i>Owners' Registered Address</i>	<i>Date Registered</i>
[REDACTED]	Grant Brian CURTIS (Previously [REDACTED] / Grant Brian CURTIS)	[REDACTED]	October 24, 2009
[REDACTED]	Grant Brian CURTIS / [REDACTED]	[REDACTED]	November 13, 2007
*** [REDACTED] (adjacent to US border)	<i>Grant CURTIS</i>	[REDACTED]	<i>June 23, 2012</i>

**SALES HISTORY FOR [REDACTED]**

<i>Sale Date</i>	<i>Purchase Price</i>	<i>Transferor(s)</i>	<i>Transferee(s)</i>
June 14, 2012	\$860,000	[REDACTED]	Grant CURTIS
Jan 29, 2010	\$755,000	Estate of [REDACTED] [REDACTED]	[REDACTED]

**PREVIOUS FICOM INVESTIGATION:**

An earlier FICOM investigation (file INV99.106.08106) in 1999 involved allegations of a falsified client signature on a Mutual Life life insurance application, dated October 23, 1996, witnessed by then-insurance agent Grant CURTIS. An insurance policy was issued and premiums deducted (\$80/mth) from the purported applicant's bank account up until 1999, when the person claims they noticed the payments and complained to Mutual Life. CURTIS would have been paid a commission at the time the policy was issued. A FICOM investigator interviewed CURTIS who denied any wrongdoing. The apparent victim – [REDACTED], signed an affidavit for Mutual Life swearing it was not his signature (which appears visibly different from samples viewed on file) and was reimbursed for premiums paid. When the FICOM investigator contacted [REDACTED] he was adamant in deflecting blame from CURTIS. The file was closed due to insufficient evidence to support any criminal charges. There does not appear to be any specific allegation of forgery against CURTIS, except that the application was witnessed by him.

## **OVERVIEW OF CURTIS' MORTGAGE TRANSACTIONS:**

### ***Background***

In November 2010, FICOM was made aware of possible unregistered mortgage broker activity being conducted by SKWIRA. This matter arose in the course of a VPD investigation into SKWIRA's involvement in an apparent boat loan fraud (VPD # 2010-180994). A search of SKWIRA's residence revealed Dominion Lending Centres ("DLC") business cards in SKWIRA's name, as well as various blank mortgage applications, T4s, Notices of Assessment ("NOA"), copies of BCDLs, etc. SKWIRA's stated address was [REDACTED] which is also CURTIS' residence. SKWIRA was employed as a leasing specialist with DLC, and thus would likely have DLC business cards in his name.

In October 2011, a new investigator was assigned SKWIRA's file. The investigator determined there was no clear evidence that SKWIRA was conducting unregistered mortgage brokering, and the file was closed. However, in the course of reviewing various mortgage files obtained in the SKWIRA investigation, some questions arose which triggered a review of CURTIS' mortgage transactions. SKWIRA purportedly referred a number of mortgage deals to CURTIS for which he was paid a referral fee. Among the documents obtained in the SKWIRA investigation, were payroll and expense records from DLC for CURTIS between January 2010 and August 2011. These records include the client name, lender, and referral fee paid (name and amount) and shows the transactions related to SKWIRA as a referral source among a number of other individuals similarly paid for referrals. The payroll records from DLC show additional transactions, referral sources (who were paid a fee) and other lenders sourced for mortgages that were not reviewed.

### ***Sampling of CURTIS Mortgage Deals Reviewed***

The investigator obtained and reviewed a sample of mortgage files from First National Financial ("First National") and Antrim Investments ("Antrim"), since these files had already arisen in the SKWIRA investigation. (CURTIS also brokered mortgages to a number of other lenders) The details and some analysis are documented in the attached spreadsheet. Each of these lenders provided FICOM with copies of some mortgage applications and documents as they were submitted by CURTIS. The contacts for these lenders were [REDACTED], Manager, BC Region at First National; and [REDACTED], Business Development Manager and one of Antrim's principals. Antrim is a family company that was founded and still operated by his father [REDACTED]. These parties were advised that FICOM was simply conducting a passive review based on some questions that arose in another inquiry, and that there was no particular suggestion of wrongdoing. They were also advised to not inform anyone, including CURTIS, of the review.

First National is an "A" mortgage lender and competes directly with retail banks for prime mortgage borrowers. Prime borrowers have relatively good credit and marketable properties which provide good security for the loans. First National is essentially a "wholesale" mortgage lender that distributes mortgages through brokers rather than having a branch system and does not offer other banking

services. Antrim is a private lender primarily involved with sub-prime mortgage lending. Sub-prime mortgage lending typically involves situations of higher credit risk which mainstream “A” lenders avoid. They are known as an “equity” lender; they generally charge higher interest rates and lending fees due to higher credit risk, and base their lending mostly on the equity in the property rather than the creditworthiness of the borrower. Antrim will often do second mortgages behind other lenders’ first mortgages.

To the best of the investigators’ knowledge, no one (including CURTIS) outside of FICOM Investigative Services and the two lenders is aware of this file review.

### ***Review of CURTIS Mortgage Deals obtained from First National and Antrim***

The details of each mortgage deal and unusual aspects are outlined in the attached spreadsheet. Taken as a whole, the various abnormalities led Investigative Services to hypothesize that a large number of these mortgage transactions may have been conducted to facilitate organized criminal activities. The following is an outline of information related to CURTIS and some unusual aspects of the mortgage deals reviewed:

- CURTIS is a flagged on PRIME as being possibly associated to organized crime, but never charged
- PRIME shows CURTIS was with SKWIRA in the commission of an extortion/robbery for which SKWIRA was convicted. CURTIS not charged. Sentencing for SKWIRA does not mention organized crime.
- A sampling of borrowers were queried in PRIME and found to have organized crime and/or general criminal connections, including drug trafficking, violence and weapons.
- A large number of transactions involve various referral sources, which creates distance between CURTIS and the purported borrowers by involving a 3<sup>rd</sup> party, making fraud difficult to prove.
- Several suspicious tenancy agreements for different properties and different borrowers where the tenancy agreement is signed by the purported tenant prior to the buyer taking possession of the property, which is unusual. The tenancy agreement is used for lending purposes as evidence of rental income which is used to qualify the mortgage. It is uncommon to have a signed tenancy agreement prior to a buyer actually having possession of a property. The usual practise in this situation is to have an appraiser provide the “market” rent for a particular property (or a suite).
- The tenancy agreements on a number of different deals have similarities in how they are complete. For example, many of these show an unusual term of 1 year plus 1 day – i.e. the start date is the 1<sup>st</sup> day of a particular month, and end date for the 1<sup>st</sup> of the same month the following year, instead of the typical 1 year lease ending the last day of the preceding month.
- Unable to match names and / or addresses for the purported tenants through internet and motor vehicle branch (“MVB”) searches. They do not have any connection to the property except for the purported tenancy agreements.

- Many borrowers are self-employed, with vague descriptions of business activities, and little to no corroborating presence on the internet or through BC Registry searches. In the investigator's experience this is unusual.
- Business entities that are registered on BC Registry, but not in good standing for failing to file.
- Inconsistencies on tax documents provided to support borrowers' incomes.
- Unusual relationships between co-borrowers, such as friends buying properties but not involving spouses.
- Unusually high number of short-closing dates – which puts pressure on lenders.
- Assets of borrowers often inconsistent with age and purported incomes. For example borrowers in early to mid-20's own expensive boats.
- Unusually high number of borrowers listing boats as assets (CURTIS formerly had a boat and ATV financing business and SKWIRA was charged with boat loan fraud).
- No or very limited internet "footprint" for CURTIS and many borrowers – unusual especially for those in sales or service related businesses
- Gifted down-payments from sources with no clear relationship to borrower (typically only accepted by lenders if the gift is from immediate family i.e. parents helping kids).
- Monthly debt-service payments, assets and liabilities are, in some cases, in excess of what can be supported by the stated income of the borrower and with no apparent explanation.
- Borrowers that have substantial cash in savings or chequing accounts listed in assets – typically affluent borrowers would not have large amounts of cash in very low interest-bearing accounts unless a particular reason (e.g. for a down-payment), rather they would be invested somewhere.
- Several borrowers' stated residential addresses appear to be commercial mail boxes.
- ████████ deal was determined to be fraudulent – VPD unable to prove knowledge of fraud with respect to CURTIS / SKWIRA; however "████████" was charged with identity theft.
- Many borrowers own multiple properties.
- High turnover rate – often properties sold after short ownership and no significant capital gain

**CURTIS CONNECTION TO ██████████, SULAIMAN (SULLY) SAFI AND ██████████:**

A connection between CURTIS and Sulaiman (Sully) SAFI (a person with apparent criminal associations as well as a kidnapping victim) was found during a separate FICOM investigation into alleged unregistered mortgage brokering by ██████████. On February 1, 2011, the Nanaimo RCMP referred a case of possible mortgage fraud to FICOM, which they had declined to investigate. The following is an outline of the circumstances:

- The complainant, ██████████, was seeking financing to purchase ██████████
- ██████████ was unable to obtain sufficient financing and the seller of the property, ██████████, referred ██████████ to ██████████
- The investigator learned ██████████ was known to police (details unknown) and that the property was previously a grow-op
- ██████████ represented himself as a mortgage broker (he has never been registered)
- During the investigation, it was learned that ██████████ referred ██████████ mortgage to ██████████, a registered sub-mortgage broker with ██████████ who obtained financing from ██████████
- On August 22, 2011, ██████████ was interviewed and stated:
  - His business partner is ██████████
  - ██████████ friend (unknown) who worked at Scotiabank introduced him to ██████████
  - ██████████ referred him a number of mortgage applications including an application from ██████████ - (NOTE: CURTIS submitted an application for ██████████ to ██████████ April 15, 2011, and the name ██████████ appears in reference to another mortgage on the DLC payroll documents for CURTIS)
  - He believed that ██████████ co-brokered ██████████ mortgage application with a "Sully SAFI" ("SAFI") - (NOTE: SAFI appears to have criminal connections; never registered as a sub-mortgage broker; appears to be the controlling mind behind "██████████" a purported lending business which is not registered)
- On August 23, 2011, ██████████ emailed the investigator a copy of ██████████ mortgage application that was on CURTIS' DLC letterhead.
- On August 23, 2011, ██████████ stated to an investigator that ██████████ mortgage application came from ██████████ and that he never dealt nor has ever met CURTIS.
- On September 2, 2011, an investigator met with CURTIS about ██████████ and CURTIS stated:
  - He once worked out of the same office as SAFI and ██████████
  - He never met ██████████ nor has he ever heard of him
  - ██████████ was a former client of his
  - ██████████ had sought his assistance to help her obtain a second mortgage, however he was unable to help her obtain financing

**SUMMARY OF PERSONS AND COMPANIES FOUND TO BE RELATED TO CURTIS**

During the review of CURTIS’ mortgage activities, a number of individuals and business entities were found to have some connection to CURTIS and are listed below. In some cases, the first name is either unknown or only the initial is known:

<i>Person / Company</i>	<i>Relationship</i>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Underwriter at First National (no longer an employee)</li> <li>▪ Internal audit of her files resulted in CURTIS being cut off from First National after some tax documents appeared to have been falsified</li> <li>▪ Subsequent meeting with CURTIS and First National’s business development staff led to reinstatement of CURTIS</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Co-owner with CURTIS of [REDACTED] ([REDACTED])</li> <li>▪ LTO shows “owner address” as [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Was mortgage broker assistant to CURTIS</li> <li>▪ A large of number of DLC mortgage deals were commission split 50/50 with [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Noted as a recipient of referral fee on DLC payroll documents for clients: [REDACTED] and, [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Recipient of 50/50 commission split as per DLC payroll documents</li> <li>▪ Referenced on payroll to clients: [REDACTED] [REDACTED]; and, [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Noted as a recipient of referral fee on DLC payroll documents for client: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Noted as a recipient of referral fee on DLC payroll documents for client: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Recipient of 50/50 commission split per DLC payroll documents for client: [REDACTED]</li> </ul>

[REDACTED]	<ul style="list-style-type: none"> <li>Noted as a recipient of referral fee on DLC payroll documents for client: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Noted as a recipient of referral fee on DLC payroll documents for clients: [REDACTED] and, [REDACTED]</li> </ul>
(Unsure if this is [REDACTED], who was accused in the murder of [REDACTED] - Maple Ridge)	<ul style="list-style-type: none"> <li>Noted as a recipient of referral fee on DLC payroll documents for clients: [REDACTED] and, [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Shown as a referral source for several mortgage deals handled by CURTIS</li> <li>Principal of [REDACTED]. (dissolved 2008)</li> <li>Recorded as referral source for fraudulent mortgage handled by CURTIS ([REDACTED], [REDACTED], [REDACTED], identity theft) – VP file #10-133236</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Appears to be a Mobile Mortgage Specialist with [REDACTED]</li> <li>Co-covenantor on 2009 mortgage for property owned by CURTIS [REDACTED]</li> <li>[REDACTED]</li> <li>Reg address [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Co-covenantor on 2008 mortgage for property owned by CURTIS [REDACTED]</li> <li>[REDACTED]</li> <li>Previously co-owned [REDACTED] with CURTIS</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Registered co-owner with [REDACTED] of [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>Following info was provided by Det. Menzies VPD (no further details known):</li> <li>Fraudulent mortgage – believe was [REDACTED] or [REDACTED]</li> </ul>

	<ul style="list-style-type: none"> <li>▪ CIBC confirms a “ [REDACTED] ” (DOB [REDACTED] [REDACTED] ) last worked at [REDACTED] in 2009</li> <li>▪ Lender was “ [REDACTED] ” (no record of registration with FICOM)</li> <li>▪ Recipient of loan proceeds was [REDACTED] [REDACTED] (SKWIRA’s company)</li> <li>▪ Notary Public [REDACTED]</li> <li>▪ November 25, 2011 anonymous tip through FICOM on-line complaint form that a “ [REDACTED] [REDACTED] ( [REDACTED] ) is a former [REDACTED] employee and is pretending to still be a mortgage specialist</li> <li>▪ Situation involved someone named [REDACTED] associated to [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Apparently associated to [REDACTED] (above fraud) per Det. Menzies</li> <li>▪ Unsure if this is [REDACTED] (deceased gang member)</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Eathan SKWIRA’s company – recipient of mortgage proceeds in apparent [REDACTED] fraud (Det. Dave Menzies, VPD)</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Lender in [REDACTED] fraud (no record of mortgage broker registration with FICOM)</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Sole principal for [REDACTED] per BC Registry</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Information provided by [REDACTED] VPD (no further details known):</li> <li>▪ Victim of identity theft</li> <li>▪ Mortgage arranged by someone personation of the registered property owner</li> <li>▪ VPD file #10-133236</li> <li>▪ CURTIS arranged mortgage through Antrim Investments (private lender registered with FICOM)</li> <li>▪ Deal purportedly referred to CURTIS by SKWIRA</li> <li>▪ VPD unable to prove fraud on the part of CURTIS or SKWIRA, although they are</li> </ul>

	<ul style="list-style-type: none"> <li>▪ suspects</li> <li>▪ Apparently a vehicle owned by [REDACTED] son is associated to other incidents of fraud (details unknown)</li> <li>▪ Notary detected the fraud and alerted police</li> <li>▪ There is an appraisal on file –suggesting someone provided access to the unit???</li> <li>▪ Address: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Accused in [REDACTED] fraud – identity theft</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Recipient of mortgage proceeds in [REDACTED] fraud</li> <li>▪ Registered address (BC Reg) [REDACTED]</li> <li>▪ Principal is [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Sole principal of [REDACTED]</li> </ul>
<p><i>The following information is from a separate FICOM investigation into unregistered mortgage brokering by [REDACTED]</i></p>	
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Vendor of a property: [REDACTED]</li> <li>▪ This property was a prior grow-op</li> <li>▪ Known to police</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Buyer of [REDACTED] (complainant to RCMP)</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ [REDACTED] referred [REDACTED] to [REDACTED] who was purported to be a mortgage broker (never registered as such).</li> <li>▪ [REDACTED] unable to obtain sufficient financing on her own.</li> <li>▪ [REDACTED] was a prior grow-op</li> <li>▪ CURTIS states never heard of [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Registered mortgage sub-broker ([REDACTED])</li> <li>▪ [REDACTED] referred the [REDACTED] deal to [REDACTED] who secured financing from [REDACTED]</li> <li>▪ Claims to not know CURTIS personally</li> </ul>

[REDACTED]	<ul style="list-style-type: none"> <li>▪ Business partner of [REDACTED]</li> <li>▪ A friend of [REDACTED] who worked at Scotia apparently introduced [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Mortgage application for [REDACTED] was referred to [REDACTED] by [REDACTED] and Sully SAFI ([REDACTED])</li> <li>▪ This mortgage application was on an application form bearing Grant CURTIS / Dominion Lending Centres logo</li> <li>▪ CURTIS states [REDACTED] a former client</li> <li>▪ CURTIS has handled other mortgage transactions for [REDACTED]</li> </ul>
Sulaiman (Sully) SAFI	<ul style="list-style-type: none"> <li>▪ Apparent controlling mind of [REDACTED] – no record of this entity found on BC Registry</li> <li>▪ CURTIS stated he used to work with SAFI ([REDACTED] investigation)</li> <li>▪ Fake Dominion Lending Centres website (<a href="http://www.imambo.com/clnt/dominion/ssafi/plyr">www.imambo.com/clnt/dominion/ssafi/plyr</a>) uses DLC logo, and the name “Dominion Lending Centres Mountain View” which is CURTIS’s registered office, phone: [REDACTED] [REDACTED] (this fax number listed is CURTIS’ fax number)</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ “Loan” business purportedly run by SAFI, that CURTIS states he briefly worked with</li> <li>▪ Was apparently located at [REDACTED], per CURTIS ([REDACTED] investigation)</li> <li>▪ An address of [REDACTED] was stated on an email (this is not an address – it’s a “0” address i.e. the corner of an intersection)</li> <li>▪ [REDACTED]</li> <li>▪ Website designed by [REDACTED] as stated on [REDACTED] website</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ [REDACTED] (same or adjacent to past business address for CURTIS, also past address of [REDACTED])</li> </ul>

	<ul style="list-style-type: none"> <li>▪ [REDACTED] / Sully SAFI)</li> <li>▪ Designed website for [REDACTED] as stated on [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ A Better Business Bureau listing shows a business address of [REDACTED] [REDACTED] (same as [REDACTED] [REDACTED])</li> <li>▪ Registered Director is: [REDACTED]</li> <li>▪ Registered address: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Registered Director of [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Current occupant of [REDACTED] [REDACTED] Mezzanine level office space for [REDACTED] occupied by [REDACTED]; mezzanine office space for unit [REDACTED] occupied by [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Current owner of [REDACTED] [REDACTED] (strata warehouse)</li> <li>▪ Registered address for company is [REDACTED] [REDACTED]</li> <li>▪ Director: [REDACTED]</li> <li>▪ Address: [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Principal of [REDACTED] and [REDACTED] [REDACTED]</li> </ul>
[REDACTED]	<ul style="list-style-type: none"> <li>▪ Borrower on a mortgage application sent to Sully SAFI / [REDACTED], submitted by DLC broker [REDACTED] ([REDACTED] forwarded this to the investigator on the [REDACTED] file)</li> <li>▪ Also was purchaser of a house from Grant CURTIS' mortgage client, [REDACTED] (now [REDACTED] per [REDACTED])</li> <li>▪ [REDACTED] was purportedly referred to CURTIS by SKWIRA in Dec 2009</li> <li>▪ This deal is noted on the attached spreadsheet</li> </ul>

[REDACTED]	<ul style="list-style-type: none"><li>▪ Sub-Mortgage Broker with [REDACTED]</li><li>▪ Referred [REDACTED] to Sully SAFI / [REDACTED] in 2009</li></ul>
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