

This is the Affidavit of Cpl. Karen Best  
made on February 12, 2021

**COMMISSION OF INQUIRY INTO MONEY LAUNDERING IN BRITISH COLUMBIA**

**The Honourable Mr. Austin F. Cullen, Commissioner**

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**AFFIDAVIT OF CPL. KAREN BEST**

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I, KAREN BEST, Corporal, with an address for service of 900 – 840 Howe Street, Vancouver B.C., AFFIRM THAT:

1. I am an officer with the RCMP, Federal Serious and Organized Crime (FSOC) – Financial Integrity/Sensitive Investigations Unit, and, as such, have personal knowledge of the facts and matters deposed to in this affidavit, save and except where based on information and belief, and where so stated, I believe it to be true.
2. I have been with the RCMP since 1996. My curriculum vitae is attached to this affidavit as **Exhibit A**.
3. I started my RCMP career with the Richmond detachment as a uniformed officer and moved into the general investigation section and economic crime unit in 2000. In 2003, I transferred to the Federal Commercial Crime Section (CCS) in Surrey. In 2008, I transferred from a CCS investigation team in Surrey to a satellite CCS team in Victoria, where I remained until 2014. During that time, CCS was renamed FSOC Group 1.
4. In 2014, I joined the FSOC Group 3 and seconded temporarily to the Integrated National Security Enforcement Team.
5. From 2018 to present, I have been with the FSOC Financial Integrity's Sensitive Investigations Unit.
6. In 2013, while I was with FSOC Group 1 Victoria, I was assigned an investigation into a

Lower Mainland mortgage broker, Grant Brian Curtis, with suspected ties to organized crime who was brought to CCS's attention by the Financial Institutions Commission (FICOM).

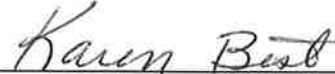
7. In preparing my report, I used information from a communication from FINTRAC to myself, dated November 18, 2013, responding to a request for information relating to Mr. Curtis. FINTRAC provided me with the reports it had received from various reporting entities relating to Mr. Curtis, company names associated to Mr. Curtis, and a description of Mr. Curtis' suspicious funds. The communication from FINTRAC also contained publicly available information from social media, provincial registries, and other websites.
8. Disclosure packages from FINTRAC contain information and intelligence specifically designed to be useful to past, ongoing, and future law enforcement investigations. As such, they contain pieces of information that alone or when put together could jeopardize public safety and the usefulness of the information gathered by FINTRAC. For those reasons, I am unable to attach the FINTRAC disclosure package on Mr. Curtis to my affidavit.
9. In 2014, the CCS Victoria team was merged with other FSOC teams on Vancouver Island. The focus shifted from financial crimes to drug investigations, and I was told the investigation into the mortgage broker was being shut down. For the next two years or so I worked on completing the investigation report as and when I could.
10. In March 2016, I completed my investigation report, which I sent to Staff Sergeant John Taylor of FSOC E Division at Green Timbers in Surrey. I concluded that the evidence was supportive of an inference that Mr. Curtis was facilitating money laundering for persons associated with organized crime. My report is attached to this affidavit as **Exhibit B** [CAN000157].
11. On January 4, 2017, I received a message from Staff Sergeant John Taylor of FSOC commending my work on the file and advising that it would be referred to Civilian Member Lynne Murphy for analysis. A record of that message is attached as **Exhibit C** [CAN000161].
12. To my knowledge, the matter was never elevated to project level. Attached as **Exhibit D** [CAN000162] is a copy of a note to file that I made indicating that my report was sent to

FSOC Financial Integrity, which elected not to pursue the matter but to pass the report on to the FSOC analyst for intel purposes.

AFFIRMED before me at the City of Victoria, in the Province of British Columbia, this 12<sup>th</sup> day of February 2021

  
\_\_\_\_\_  
Commissioner for Taking Affidavits for  
the Province of British Columbia

**Cst. Heather Brown**  
**Reg # 58398**

  
\_\_\_\_\_  
Signature of Karen Best

\_\_\_\_\_  
Commissioner's stamp or printed name

# CURRICULUM VITAE

Corporal Karen Best

This is Exhibit " A " referred to in  
the affidavit of Karen Best  
sworn before me at Victoria, BC  
this 12<sup>th</sup> day of February, 2021

Heather Brown Heather Brown  
A Commissioner for taking Affidavits  
for British Columbia

## Postings

1995-1996 **RCMP Training Academy Depot**

- Sworn in April 9, 1996 as a Regular Member of the RCMP

1996-2003 **Richmond RCMP Detachment**

- General Duty
- Airport Policing
- Community Policing
- Fraud / Economic Crime Unit – 2000-2003

2003-2008 **E Division RCMP Federal Commercial Crime Section ("CCS") – Surrey**

- Promoted to Corporal 2007-03-27

2008-2011 **E Division RCMP CCS – Victoria**

- Transferred to CCS Victoria team – 2008-07-21

2011-2014 **E Division FSOC – Group 1**

- CCS Victoria team became part of FSOC Financial Integrity (Group 1) in re-engineering of Federal Policing on or about 2011-01-01.

2014-2018 **E Division Federal Serious Organized Crime ("FSOC") – Group 3 – Victoria**

- FSOC Group 1 Victoria team merged with the FSOC Victoria Border Integrity Team (Victoria) and FSOC Federal Island Drugs (Nanaimo) to create FSOC Group 3 – Victoria team – approximately October 2014.

Currently **FSOC Financial Integrity – Sensitive Investigations Team (“SIU”)**

- Transferred from FSOC Group 3 to FSOC Financial Integrity – Sensitive Investigations Team (“SIU”).

### **Financial Crime Investigation Training**

Proceeds of Crime/Money Laundering	2018-04-23	2018-04-27
Offence-Related Property Fundamentals 1	2018-04-02	2018-04-20
Offence-Related Property Fundamentals II	2018-04-20	2018-04-21
Offence-Related Property Fundamentals III	2018-04-21	2018-04-21
Terrorist Financing Investigations	2016-09-26	2016-09-30
Proceeds of Crime Concepts	2015-04-30	2015-05-22
Organized Crime Course	2014-03-03	2014-03-14
Counterfeit Travel Identification Documents	2011-06-30	2011-06-30
Evidence Gathering Financial Institutions	2009-11-02	2009-11-02
Commercial Crime Investigator Course	2005-02-07	2005-02-17
Counterfeit Payment Card Analysis	2004-12-01	2005-01-31
Counterfeit Currency Analysis CBT	2004-08-01	2004-09-30



**RCMP File 5001-2013-215**

**CURTIS, et al,**

**Suspected Money Laundering for  
Organized Crime**

This is Exhibit " B " referred to in  
the affidavit of Karen Best  
sworn before me at Victoria, BC  
this 12<sup>th</sup> day of February 2021  
Heather Brown  
A Commissioner for taking Affidavits  
for British Columbia

Royal Canadian Mounted Police  
"E" Division  
Federal Serious and Organized Crime  
Group 3 (Victoria)

Date: 2016-03-15

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## INTRODUCTION

1. In 2012, the Financial Institution Commission of British Columbia (FICOM) contacted the RCMP regarding the questionable conduct of a sub-broker, Grant Brian CURTIS (CURTIS), employed by Dominion Lending Centres (DLC) in Pitt Meadows, BC.
2. Among CURTIS' associates, Eathan SKWIRA, a friend of Grant CURTIS, and apparently CURTIS' principal source of client referrals appeared to play a significant role in laundering funds. SKWIRA has a criminal record for fraud. Both CURTIS and SKWIRA associate with known organized crime figures, including a self-professed money launderer, Sulaiman SAFI.
3. The Integrated Market Enforcement Team (IMET) was familiar with CURTIS as the BC Securities Commission investigated CURTIS for his role in a suspected Pump and Dump scheme. IMET found that there was a strong relationship between CURTIS and the criminal community and concluded that CURTIS might be facilitating money laundering as well as other fraudulent mortgage transactions. IMET also noted that a significant number of properties brokered by CURTIS were either suspected or documented marijuana grow operations. IMET recommended that the FSOC Financial Integrity Section investigate the matter further.
4. By way of a Production Order, FSOC obtained FICOM's documents and examined them in detail. In addition, FSOC conducted background checks on individuals identified in FICOM documents.

## MORTGAGE FRAUD DEFINED

5. A Mortgage fraud is any scheme designed to obtain mortgage financing under false pretenses. The effects of mortgage fraud include, according to industry estimates, losses to the financial industry in the hundreds of millions of dollars. Criminal groups involved in mortgage frauds are able to funnel their proceeds of crime into further criminal activities.

6. Mortgage fraud schemes range widely in terms of sophistication and complexity. Common features in these schemes include:
  - 6.1. Misrepresentation of the borrower's income and/or identity;
  - 6.2. Manipulation of the property's age, size and value
  - 6.3. Inflating an appraisal in order to obtain a mortgage for more than a property is worth;
  - 6.4. Claiming income or assets the borrower does not have;
  - 6.5. Posing as a borrower on behalf of another who is actually making the purchase;
  - 6.6. Using false names on mortgage documents.
7. Mortgage fraud schemes can be used to facilitate other criminal activities such as marihuana grow operations, clandestine drug laboratories, and money laundering.

## **MONEY LAUNDERING IN RESIDENTIAL REAL ESTATE**

8. The following information was obtained from a report published by the Financial Crimes Enforcement Network (FinCEN) of the United States of America:
  - 8.1. Residential real estate-related money laundering is often associated with mortgage loan fraud. Both money launderers and fraudsters engaged in mortgage loan fraud to reap illicit profits may employ nominee or straw buyers to fraudulently secure mortgage loans. However, once a fraudulent mortgage loan is funded, the actions of the fraudster and those of the launderer diverge.
  - 8.2. The fraudster, who has generally employed a dishonest appraiser to inflate the value of the property and thereby the face amount of the loan granted by the lending institution (property flipping), need only take the proceeds of the loan and abscond.



- 8.3. The launderer has no interest in defrauding the lending institution. Instead, the launderer will strive to project an image of normalcy by continuing to make regular and timely payments on the mortgage loan, thereby integrating his illicit funds. Eventually, the launderer may re-sell the property, allowing for a trade-up to a more expensive property affording greater laundering and investment potential.
- 8.4. Whereas a lending institution is virtually certain to report suspicious transactions in instances where it is the target of either a failed or successful mortgage loan fraud for profit scheme which threatens the institution's revenues, the same lending institution may have significant difficulty in even identifying mortgage loan fraud perpetrated by the money launderer.
- 8.5. The most commonly reported professions associated with the residential real estate industry and suspected of being involved in residential real estate-related structuring and/or laundering were builders, contractors and re-habbers.
- 8.6. "Money laundering" is defined as the disguising of funds derived from an illicit activity so that the funds may be used without detection of the illegal activity that produced them. Money laundering is a well-thought out process accomplished in three stages:
- 8.6.1. Placement: Requires physically moving and placing the funds into financial institutions or the retail economy. Depositing structured amounts of cash into the banking sector, and smuggling currency across international borders for further deposit, are common methods for placement.
- 8.6.2. Layering: Once the illicit funds have entered the financial system, multiple and sometimes complex financial transactions are conducted to further conceal their illegal nature, and to make it difficult to identify the source of the funds or eliminate an audit trail. Purchasing monetary instruments (traveler's checks, banks drafts, money orders, letters of credit, securities, bonds, etc) with other monetary

instruments, transferring funds between accounts, and using wire transfers facilitate layering.

- 8.6.3. Integration: The illicit funds re-enter the economy disguised as legitimate business earnings (securities, businesses, real estate). Unnecessary loans may be obtained to disguise illicit funds as the proceeds of business loans.

## FINTRAC

9. The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) is Canada's financial intelligence unit, a specialized agency created to receive, analyze and disclose financial intelligence on suspected money laundering and terrorist activity financing.
10. Under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and its accompanying regulations, financial institutions and intermediaries are required to report to FINTRAC certain kinds of transactions.
11. The following entities are required to report:
  - 11.1. Financial entities (includes banks, credit unions, caisses populaires, trust and loan companies and agents of the Crown that accept deposit liabilities);
  - 11.2. Life insurance companies, brokers or agents;
  - 11.3. Securities dealers, portfolio managers and investment counsellors who are provincially authorized;
  - 11.4. Persons engaged in the business of foreign exchange dealing;
  - 11.5. Money services businesses (including alternative remittance systems, such as Hawala, Hundi, Chitti, and others);
  - 11.6. Agents of the Crown when they sell money orders;

- 11.7. Accountants and/or accounting firms (when carrying out certain activities on behalf of their clients);
  - 11.8. Real estate brokers or sales representatives (when carrying out certain activities on behalf of their clients); and,
  - 11.9. Casinos.
12. The following types of information are reported to FINTRAC:
- 12.1. Suspicious transactions related to money laundering;
  - 12.2. Suspicious transaction related to terrorist activity financing;
  - 12.3. Possession or control of terrorist property;
  - 12.4. International electronic funds transfers of \$10,000 or more;
  - 12.5. Large cash transactions of \$10,000 or more; and
  - 12.6. Cross-border movements of \$10,000 or more in currency or monetary instruments.
13. Information obtained from FINTRAC has been included in this report.

## **FICOM AND THE MORTGAGE BROKERS ACT**

### **FICOM**

- 14. The Financial Institution Commission of British Columbia (FICOM) is a regulatory agency of the provincial Ministry of Finance. FICOM is responsible for administering nine statutes including the *Mortgage Brokers Act*.
- 15. The Superintendent and Chief Executive Officer of FICOM serve in several official capacities including as the Registrar of Mortgage Brokers. (“the

Registrar”) The Registrar is responsible for registering entities and individuals as mortgage brokers and sub-mortgage brokers under the *Mortgage Brokers Act*.

#### **DEFINITION: MORTGAGE BROKER AND SUB-MORTGAGE BROKER**

16. A mortgage broker means a person who does any of the following:
  - 16.1. carries on a business of lending money secured in whole or in part by mortgages, whether the money is the mortgage broker's own or that of another person;
  - 16.2. holds himself or herself out as, or by an advertisement, notice or sign indicates that he or she is, a mortgage broker;
  - 16.3. carries on a business of buying and selling mortgages or agreements for sale; in any one year, receives an amount of \$1,000 or more in fees or other consideration, excluding legal fees for arranging mortgages for other persons;
  - 16.4. during any one year, lends money on the security of 10 or more mortgages;
  - 16.5. carries on a business of collecting money secured by mortgages.
17. A sub-mortgage broker is defined as any person who actively engages in any of the things referred to in the definition of mortgage broker and is employed, either generally or in particular case, by, or is a director of, a mortgage broker.

#### **MORTGAGE BROKERS ACT**

18. The *Mortgage Brokers Act* sets out provisions for the Registrar to investigate any matter or thing arising out of this Act or the regulations.

### **THE FICOM REPORT**

19. In October 2011, Grant CURTIS came to the attention of FICOM following a Vancouver Police Department investigation involving a complaint of an

unregistered mortgage broker activity being conducted by Eathan SKWIRA. FICOM found no clear evidence against SKWIRA. However, in the course of reviewing various mortgage files obtained in FICOM's investigation, questions arose which triggered a review of CURTIS' mortgage transactions.

20. Among the documents obtained in the SKWIRA investigation were payroll and expense records from CURTIS and CURTIS' employer, Dominion Lending Centre (DLC) from January 2010 to, and including, August 2011. These records included the client name, lender, and referral fee paid (name and amount.)
21. Eathan SKWIRA purportedly referred a number of mortgage deals to CURTIS for which CURTIS paid SKWIRA a referral fee. FICOM investigators thought the relationship unusual. 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 existed, or a person who was a member of a formal entity, such as a professional association referring members.
22. Based on the presence of these unusual aspects, FICOM obtained a sample of mortgage transactions handled by CURTIS from two lenders (Antrim Investments and First National). Each of these lenders provided FICOM with copies of some mortgage applications and documents submitted by CURTIS.
23. FICOM assessed 47 mortgage files ranging in date from September 16, 2008, and including, January 7, 2011. According to their report, some of the unusual aspects of the mortgages were as follows:
  - 23.1. Tenancy agreements where the tenants signed the agreements before to the buyers took possession of the property. The tenancy agreements were used for lending purposes as evidence of rental income in order 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 practice 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 completed. For example, many of these show an unusual term of one year plus one day; that is, the start date is the first day of a particular month, and end date for the first of the

same month the following year, instead of the typical one year lease ending the last day of the preceding month.

- 23.2. Tenants did not appear to have any connection to the properties except for the purported tenancy agreements. FICOM investigators were unable to match names and/or addresses for the purported tenants through internet and motor vehicle branch searches.
- 23.3. Many borrowers were self-employed, with vague descriptions of business activities, and little to no corroborating presence on the Internet or through BC Registry searches.
- 23.4. Business entities registered with the BC Companies Registry but not in good standing due to failing to file.
- 23.5. A large number of transactions involve various referral sources, which creates distance between CURTIS and the purported borrowers by involving a third party, making fraud difficult to prove.
- 23.6. Inconsistencies on tax documents provided to support borrowers' incomes.
- 23.7. Unusual relationships existed between co-borrowers, such as friends buying properties but not involving spouses.
- 23.8. An unusually high number of short closing dates.
- 23.9. Assets of borrowers were often inconsistent with age and purported incomes; for example, borrowers who were in their early to mid-20's owned expensive boats.
- 23.10. An unusually high number of borrowers who listed boats as assets.
- 23.11. No or a very limited Internet "footprint" for CURTIS - unusual especially for those in sales or service related business such as CURTIS.
- 23.12. Gifted down payments from sources with no clear relationship to the borrower (typically only accepted by lenders if the gift is from immediate family – for example, parents helping their children).

- 23.13. Monthly debt-service payments, assets, and liabilities were, in some cases, in excess of what could be supported by the stated income of the borrower and with no apparent explanation.
  - 23.14. 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 (for example, for a down-payment), rather they would be invested somewhere.
  - 23.15. Several borrowers' stated residential addresses appear to be commercial mailboxes.
  - 23.16. Many borrowers own multiple properties.
  - 23.17. High turnover rate - often properties sold after short ownership and no significant capital gains.
24. FICOM investigators hypothesized that these questionable transactions were criminal in nature but that it would be difficult to prove misconduct within the scope of FICOM's regulatory authority and capabilities. Further, even if FICOM found a breach of the *Mortgage Brokers Act*, the potential outcome would not be sufficient to revoke CURTIS' mortgage broker registration. For this reason, FICOM referred the matter to the RCMP.

## **GRANT BRIAN CURTIS**

### **BACKGROUND INFORMATION**

- 25. CURTIS has been a registered sub-mortgage broker in British Columbia since July 11, 2008. CURTIS' sponsoring Mortgage Broker Firm was Dominion Lending Centres Mountain View Ltd ("DLC") at 19675 Joyner Place, Pitt Meadows B.C.
- 26. CURTIS reportedly earned approximately \$100,000 in his first year as a sub-mortgage broker, which is, according to FICOM, significantly higher than one would normally see for someone new to the industry.
- 27. In 2006, CURTIS was an insurance broker.

## CRIMINAL HISTORY

### Extortion - Abbotsford Police Department File #2006-28282

28. On June 11, 2006, the complainant/victim [Personal Information] pulled up to his business and observed two large men (identified as Eathan SKWIRA and Grant CURTIS) standing by a vehicle. CURTIS was the leasee of the vehicle.
29. SKWIRA said he was there to collect money owed to [Personal Information] business partner. SKWIRA threatened [Personal Information] pulled out a semi-automatic handgun and waved it around. [Personal Information] wrote a cheque for \$14,000 and gave it to SKWIRA. SKWIRA then made [Personal Information] give him the keys to one of the cars belonging to [Personal Information] business and SKWIRA drove away in it.
30. Abbotsford Police arrested SKWIRA when SKWIRA and [Personal Information] business partner made additional threats against [Personal Information] CURTIS was not charged.

### Cannabis Cultivation - Langley RCMP File # 2012-551

31. On January 8, 2010, Langley RCMP executed a search warrant a residence at [Personal Information] based information supplied by BC Hydro.
32. A male, [Personal Information] was located in the residence and arrested. Health Canada documentation was produced but no licence. A rental agreement between a [Personal Information] and Grant CURTIS was located in the residence. [Personal Information] personal belongings were not located in the residence. The police investigator was of the opinion that [Personal Information] was hired under the pretense of looking after a Health Canada marihuana grow. No charges were laid.

### Fraud-stock market related offence - RCMP IMET File # 2012-616.

33. [Personal Information] was under investigation by the BC Securities Commission for a suspected pump and dump scheme. The RCMP Integrated Market Enforcement Team (IMET) investigated [Personal Information] for suspected organized crime links.
34. The principals of [Personal Information] were [Personal Information] and [Personal Information] Grant CURTIS was a shareholder. [Personal Information] operated a yacht charter business through its ownership of a 120-ft motor yacht. The company also operated a life settlement business. According to the BC Security Commission,



the company was not profitable and with an accumulated deficit of \$26.5 million by 2011.

35. Between May 21 and June 28, 2012, [Personal Information] issued unsubstantiated and outrageous claims via news releases, which resulted in a falsely inflated in the value of their shares. Before the BCSC obtained a temporary halt trade order, between April 26 and June 28, 2012, CURTIS made a gross profit of \$738,000.

## PROPERTIES

[Personal Information]

36. On August 31, 2005, Grant CURTIS and CURTIS' wife, [Personal Information] purchased [Personal Information] for \$409,000.00. They borrowed \$375,462.00 at Prime less 0.500% per annum from HSBC Bank Canada.
37. On April 24, 2007, [Personal Information] and Grant CURTIS borrowed \$43,500.00 at 9.99% per annum from [Personal Information] of Toronto, Ontario. This second mortgage was a continuing collateral security for payment of the balance outstanding from time to time on the CURTIS' VISA account with the Mortgagee.
38. On October 7, 2009, Grant CURTIS, borrowed \$531,119.35 at Prime plus 0.200% from [Personal Information] of Toronto, Ontario. [Personal Information] was the covenantor.
- 38.1. Covenantor is a person who promises to be responsible for the repayment of a loan. In a mortgage, this means the Borrower.
39. On October 16, 2013, the BC Assessment Roll Report assessed value was \$556,000.

[Personal Information]

40. On November 15, 2007, Grant CURTIS and [Personal Information] purchased [Personal Information] [Personal Information]. The market value at the time of purchase was \$1,050,000.00.

41. Grant and [Personal Information] CURTIS borrowed \$682,500.00 at Prime Rate minus 0.850% per year from [Personal Information] and borrowed \$155,000.00 at 11.0% per annum from [Personal Information] (businesswoman) and [Personal Information] (businessman) of [Personal Information]
42. On December 12, 2011, Grant CURTIS and [Personal Information] borrowed \$850,000.00 at bank's prime rate plus 10.00% per annum, from [Personal Information]
43. The 2013 Assessment Roll Report shows the owners as Grant Brian CURTIS and [Personal Information] of [Personal Information]. The 2013 Assessed value was \$780,000.00.

[Personal Information]

44. On January 13, 2008, Grant CURTIS and [Personal Information] transferred title to [Personal Information] businessman, and Grant Brian CURTIS, as tenants in common, both of [Personal Information] being a ½ value transfer market value at \$285,000.00 for "\$1.00 and other good and valuable consideration."
45. Grant Brian CURTIS and [Personal Information] borrowed \$460,000.00 at 5.99% per annum from [Personal Information]
46. On October 8, 2009, [Personal Information] transferred title in fee simple to Grant Brian CURTIS, of [Personal Information]. The market value was \$261,000.00.

[Personal Information]

47. On June 11, 2012, Grant CURTIS bought a vacant lot at [Personal Information]. This property is adjacent to the Canada/US border. The property was valued at \$860,000.00.
48. Grant CURTIS borrowed \$568,400.00 at 8.49% per annum from Antrim Balanced Mortgage Fund Ltd.
49. The 2013 BC Assessment Roll Report assessed the property at \$810,200.00.

## COMPANIES

Personal Information

50. On February 5, 1996, Personal Information incorporated. The company was dissolved on June 16, 1999, for Failure to File.
51. Grant CURTIS of Personal Information was former director.
52. Personal Information of Vancouver, BC was also a former director.
  - 52.1. Personal Information was the so-called victim of a fraud complaint against CURTIS. According to FICOM, in 1999 they received a complaint involving allegations of a falsified client signature on a Mutual Life application for life insurance, dated October 23, 1996, witnessed by then-insurance agent Grant CURTIS. An insurance policy was issued and premiums deducted (\$80/month) from the purported applicant's bank account up until 1999, when the person claimed to noticed the payments and complained to Mutual Life. A FICOM investigator interviewed CURTIS who denied any wrongdoing. The apparent victim, Personal Information signed an affidavit for Mutual Life swearing it was not his signature and was reimbursed for premiums paid. When the FICOM investigator contacted Personal Information he was adamant in deflecting blame from CURTIS. The file was closed due to insufficient evidence to support any criminal charges.

Personal Information

53. On June 12, 1998, Personal Information incorporated as Personal Information On July 23, 1998, the business' name changed to its current name. On February 22, 2003, the company dissolved for Failure to File.
54. Grant CURTIS of Personal Information was a former director.

Personal Information

55. On February 15, 2001, Personal Information incorporated as Personal Information On March 14, 2003, the name of the company changed to Personal Information

its current name. The last annual report filed was on February 2, 2004. On March 5, 2007, the company dissolved for Failure to File.

56. Grant CURTIS of [Personal Information] was the President/Secretary /Director.

[Personal Information]

57. On February 9, 2001, [Personal Information] incorporated in British Columbia under the name [Personal Information]. The name of the business has changed from [Personal Information] then to [Personal Information].

58. Grant CURTIS is the president, secretary, and director.

59. Of interest, in 2004 this company leased a 2004 Chevrolet Silverado truck.

- 59.1. According to ICBC, Eathan SKWIRA, of [Personal Information] [Personal Information] was the principle driver of this vehicle.

[Personal Information]

60. [Personal Information] is an Ontario company with shares quoted on the Over-the-Counter Bulletin Board in the United States. Its principal office is in Richmond, BC.

61. [Personal Information] operates a yacht charter business through its ownership of a 120-ft yacht. [Personal Information] has also been involved in life settlement business, which involves buying life insurance policies from policyholders at a discount to their face value.

62. [Personal Information] is President and Chief Executive Officer, and [Personal Information] is the Chief Financial Officer, and Grant CURTIS was a shareholder.

63. Between April and mid-July of 2012, [Personal Information] shares, despite continuing losses, surged suddenly. This surge coincided with certain news releases and an internet promotional campaign. During this time, accounts in the names of individuals associated with [Personal Information] engaged in significant trading including CURTIS.

64. In July 2012, the BC Security Commission (BCSC) issued a cease-trade order and notice of hearing against the company, [Personal Information] and CURTIS. The company appealed the cease-trade order to a BCSC hearing panel. The BCSC hearing panel concluded: "The trading pattern is suspicious (it has some of the earmarks of a manipulation) and although [Personal Information] news releases may have contributed somewhat to the rise in price and volume, they could not alone account for a stock price...[rise]." The panel also wrote: "That is not a credible value for a company with a nascent business and a history of no profits and significant losses." However, the panel said that there was insufficient evidence to extend the cease-trade order.
65. [Personal Information] issued a news release quoting [Personal Information] as saying that the BCSC investigator had "acted in a high-handed, untruthful, and misleading manner from the time he attended at their corporate office in Richmond accompanied by the police (to execute a production order)." In response, BCSC filed a defamation lawsuit against [Personal Information]

[Personal Information]

66. On January 7, 2013, [Personal Information] incorporated in Alberta. The company directors are Grant CURTIS of [Personal Information] and [Personal Information]
67. On June 21, 2013, [Personal Information] registered with the Registrar of Companies in British Columbia. [Personal Information] and Grant CURTIS were the directors.
68. According to the [Personal Information] website, [Personal Information] was a "socially responsible company that's working full time in 'Life Settlement.'" [Personal Information] acquired products that are for all practical reasons, uncorrelated to any financial market. [Personal Information] specializes in utilizing senior life insurance settlement policies or more commonly known as [Personal Information] as the asset basis."
69. [Personal Information] are viatical settlements. A viatical settlement is a transaction in which an insured person with diminished life expectancy transfers the entitlement to receive the death benefit under the policy of insurance to another person. This other person agrees immediately to pay the insured person an amount that is less than the face value of the death benefit and undertakes to

pay the premiums for the insurance policy as they come due. There is a small viatical settlement industry in Canada. The viatical settlement industry in the United States has transformed itself from an industry focused on AIDS patients and others suffering from terminal diseases to one focused on senior citizens. This shift in focus, coupled with the rising numbers of senior citizens, led to a notable expansion of the viatical settlement industry in the United States

70. Section 152 of the *Insurance Act* of British Columbia reads: “Any person, other than an insurer or its authorized agent, who advertises, or holds himself or herself out, as a purchaser of life insurance policies or of benefits under them, or who traffics or trades in life insurance policies for the purpose of procuring the sale, surrender, transfer, assignment, pledge or hypothecation of them to himself or herself or any person, commits an offence against this Act.”
71. Under the *Insurance Act*, the limitation period is 2 years after the facts on which the proceedings are based first come to the knowledge of the Superintendent. The "Superintendent" means the Superintendent of Financial Institutions under the Financial Institutions Act; that is FICOM.
72. Apparently, a viatical settlement business can operate in British Columbia but cannot purchase BC-based policies.
73. As of July 2014, Personal Information office in Langley was empty. Notices on the door indicated that the business’s landlord had changed the locks and that CURTIS and Personal Information owed several months’ rent.

## FINTRAC INFORMATION

74. The following transactions R5 - PII
  - 74.1. On September 7, 2006, Grant CURTIS deposited \$13,360.00 CAD cash into his joint account held with wife Personal Information  
Personal Information
  - 74.2. On March 9, 2012, and on October 1, 2012, casinos reported that Grant CURTIS made cash redemptions of slot jackpots totaling \$24,992.00 CAD.

- 74.3. On May 10, 2012, [Personal Information] located in Belize City, transferred \$100,000.00 USD to Grant CURTIS for \$100,000.00.
- 74.4. Between May 24, 2012 and June 28, 2012, there were six transfers from [Personal Information] into an HSBC account jointly held by [Personal Information] and Grant CURTIS totaling \$822,856.00. The CURTIS moved the funds from the HSBC account, via cheque and/or bank draft (issued to Grant CURTIS and/or [Personal Information] and deposited to RBC accounts in their names. This placed the HSBC account in overdraft with a negative balance of \$234.68.
- 74.4.1. [R5 - PII] that these funds were associated to the [Personal Information] Pump and Dump scheme.
- 74.4.2. In July 2012, the BC Securities Commission issued a freeze order on the account. The order was subsequently lifted in August 2012; however, no further inward transfers were observed into the account. Although the BCSC did not pursue further action against CURTIS, the sudden influx and high volume of funds into account was consistent with typical pump and dump activity. Moreover, the activity was not in line with CURTIS' normal banking pattern. The sudden spike in activity was unusual and a typical money laundering indicator (reporting entity indicated possible link to criminal activity.)
- 74.4.3. According to FINTRAC, the pattern was consistent with money laundering
- 74.5. On September 27, 2013 and September 28, 2013, \$16,000.00 CAD cash was deposited via two deposits to an account held by Grant CURTIS and [Personal Information]
- 74.6. On August 29, 2013, [Personal Information] ordered an Electronic Funds Transfer to the benefit of [Personal Information] listed in Iowa for \$11,250.00 USD. Additional transaction information cited "Client name [Personal Information] insurance premium payments."
- 74.6.1. No additional information on a [Personal Information] was located.

## EATHAN SKWIRA

### BACKGROUND

75. Eathan SKWIRA has been involved in street level violence, drug-related offences, property crimes, and fraud. SKWIRA has been associated to the Hells Angels MC and the Independent Soldiers.
76. SKWIRA was on probation from June 2014 to December 2015. His probation officers describe SKWIRA as:
- 76.1. Pleasant, articulate, intelligent, and manipulative.
  - 76.2. Grade 12 education having graduated from Gladstone High School in Vancouver.
  - 76.3. He attended BCIT and BC Vancouver Community College.
  - 76.4. He has training as a mechanic, having once having a mechanic business [Personal Information] specializing in custom motorcycles. Automotive work is a hobby only now.
  - 76.5. He operates his own construction business, [Personal Information] SKWIRA also completed the Home Inspection course in 2010.
  - 76.6. His common-law spouse is [Personal Information]
  - 76.7. He has a 17-year-old son, from a past brief relationship, and has two children with [Personal Information]

### COMPANIES

[Personal Information]

77. [Personal Information] (are SKWIRA's initials) was Incorporated May 2001. Eathan SKWIRA of [Personal Information] is the sole proprietor as well as the president/secretary/director.



Personal Information

78. Personal Information was incorporated Feb 2006. The business dissolved in August 2008 for failing to file. Eathan SKWIRA was the director.

Personal Information

79. Personal Information incorporated on August 1982. Secretary/Director: Eathan SKWIRA (removed October 2006)

Personal Information

80. Filing date: November 1994. No other information obtained.

## CRIMINAL HISTORY

### Boat Loan Fraud – Vancouver Police Department File # 2010-180994

81. July 2010, SKWIRA contacted Personal Information and told her that he had several people that wanted to purchase a boat he had and that he needed her help with selling this boat by facilitating the financing. Personal Information was a business manager at several car dealerships and a licenced broker. She agreed to assist with the sale of his boat, as she prepared a financing contract for SKWIRA in the past.
82. SKWIRA reportedly purchased the boat he wanted to sell on July 3, 2010 from a male by the name of Personal Information. A receipt signed by SKWIRA, stated that he purchased the boat and trailer for \$25,000 plus auto parts valued at \$8,000 to \$10,000.
83. Personal Information was licensed to conduct financing applications through Personal Information which owned by Personal Information agreed to use his business to facilitate the paperwork for the financing of this boat by effectively becoming the temporary owner of the boat. The buyer was to purchase the boat from Personal Information with the financing through Personal Information and then Personal Information would pay SKWIRA once the bank approved the financing and paid out the money.
84. Personal Information is a client of Grant CURTIS. Refer to the section on Personal Information for more information.

85. [Personal Information] prepared the contract and all of the appropriate paperwork for a buyer by the name of [Personal Information]. The application failed and was declined by [Personal Information] as [Personal Information] had no assets and therefore did not qualify for financing.
86. SKWIRA immediately came forward with a second buyer by the name of [Personal Information] [Personal Information] who had supposedly provided a \$20,000 cash deposit. [Personal Information] prepared another contract for financing. SKWIRA and [Personal Information] were unable to co-ordinate a time and place that the buyer and she could meet to sign the loan application contract. SKWIRA seemed to want to push the sale through quickly and asked [Personal Information] have all of the contracts sent to him, and he would get the buyer to sign everything and forward the completed contract back to her with the appropriate paperwork attached. [Personal Information] initially refused, but SKWIRA assured her that everything was ok and to trust him. The contract was forwarded to SKWIRA, apparently signed by the buyer [Personal Information] and returned to [Personal Information] by SKWIRA with a copy of a BCDL and a copy of a Notice of Assessment both in the name of [Personal Information]. [Personal Information] received the signed paperwork and signed the contract without being present to witness the signatures or the original BCDL. (It was subsequently determined that all of the documents forwarded to [Personal Information] from SKWIRA for the [Personal Information] application were forged.) [Personal Information] approved the loan.
87. On or about July 16, 2010, [Personal Information] received \$72,464.53 from [Personal Information] [Personal Information]. To complete the transaction, on July 16, 2010, [Personal Information] wrote a cheque for \$62,078.00 payable to [Personal Information]. According to the BC Company Registry, the only director of [Personal Information] is Eathan SKWIRA.
- 87.1. Recall, [Personal Information] dissolved for failure to file two years previously on August 25, 2008.
88. On July 21, 2010, [Personal Information] received an address change for [Personal Information] [Personal Information]. Pre-authorized payments for the loan withdrawn from a [Personal Information] account. A male, identifying himself as [Personal Information] opened the [Personal Information] account on June 30, 2010, at a branch on E Hastings. The first few payments on the loan were NSF. On August 13, 2010, an unidentified male entered a Surrey branch of [Personal Information] and made a cash deposit on the [Personal Information] loan. On September 10, 2010, a second unidentified male entered a surrey branch of [Personal Information] [Personal Information] and made another cash deposit on the loan. All documentations and identification produced in opening the account were fraudulent.

89. On October 13, 2010, [Personal Information] sent [Personal Information] a letter congratulating him on the purchase of his boat to the New Westminster address. The real [Personal Information] received the letter. He contacted the bank to report that he had not purchased a boat and that the loan was fraudulent. [Personal Information] name was misspelled but documents correctly showed [Personal Information] date of birth, SIN, and address. The documents also show a home phone number of [Personal Information] which actually belonged to [Personal Information]
90. Vancouver Police confirmed that the boat and trailer were also fictitious. SKWIRA provided [Personal Information] a number of fraudulent documents, which included insurance papers, BC Online search results, receipts, and a Notice of Assessment for [Personal Information]
91. Suspected forged documents such as Canada Revenue Agency Notices of Assessments appeared on mortgages brokered by CURTIS.
92. The Vancouver Police investigator interviewed [Personal Information] [Personal Information] was of the opinion that neither had knowledge of the fraud. [Personal Information] apparently confronted SKWIRA about the fraud and SKWIRA paid back approximately \$10,000.00 of the \$62,078.00.
93. On September 25, 2010, Vancouver Police executed a search warrant on SKWIRA's residence at [Personal Information] Among the items seized were:
- 93.1. Business cards for [Personal Information] Eathan SKWIRA owner.
  - 93.2. Business cards for Eathan SKWIRA as a "leasing professional" with Dominion Lending Centres.
  - 93.3. A personal cheque from [Personal Information] for \$30,000 dated November 25, 2008.
  - 93.4. [Personal Information] credit reports.
  - 93.5. Revenue Canada documents with names and social insurance numbers, completed mortgage applications from Dominion Lending Centres, tax returns, and T4's - all containing personal identifiers.

94. Vancouver Police contacted DLC and learned that SKWIRA worked for DLC as a leasing professional in 2007. However, DLC fired SKWIRA in 2008 following complaints that SKWIRA was passing himself off as a mortgage broker. In 2010, DLC reported SKWIRA to the FICOM when they recently received another complaint from a relator claiming that SKWIRA again identified himself as a mortgage broker. There is no apparent reason for SKWIRA to possess the mortgage applications, and personal identifiers found in his residence.
95. Vancouver Police interviewed SKWIRA. SKWIRA said he had severe financial problems. He claimed the boat and trailer existed. He bought and sold the boat and trailer, but for tax purposes, never put them in his name. SKWIRA claimed he was merely a mechanic that does referrals to brokers he knows at DLC for extra money.
96. [Personal Information] owns the house rented by Eathan SKWIRA. [Personal Information] was the covenantor on CURTIS' 2009 mortgage and is a client of Grant CURTIS. See the section on [Personal Information] for further information.

#### **Mortgage Loan Fraud - Vancouver Police File # 2011-17751**

97. On October 14, 2010, a notary public contacted the Vancouver Police Department. The notary was contacted by a male, [Personal Information] who claimed to be the son of [Personal Information] retained the notary to represent his father in the conveyance of documents in relation to a \$310,000 equity loan. [Personal Information] (later identified as [Personal Information] showed up at the notary's office. [Personal Information] produced a counterfeited BCDL to represent himself as the property owner when he signed documents to complete the transaction. [Personal Information] left instructions to make the cheque payable to a third party company [Personal Information] ([Personal Information] (Eathan SKWIRA's business)
98. The Vancouver Police contacted the real [Personal Information] who confirmed that he was the victim of an identity theft.
99. On October 15, 2010, the notary contacted [Personal Information] and told him that the cheque would be ready that afternoon. Vancouver Police officers were waiting when [Personal Information] returned to pick up the cheque. [Personal Information] and two accomplices [Personal Information] [Personal Information] who were waiting in a vehicle registered to [Personal Information] were arrested.

100. According to the FICOM, [Personal Information] was a [Personal Information] [Personal Information] specialist. [Personal Information] last worked at [Person] in 2009. On November 25, 2011, FICOM received an anonymous tip that [Personal] was pretending to be a mortgage specialist.

### **Mortgage Loan Fraud - Vancouver Police File # 2010-133263**

101. On August 5, 2010, [Personal Information] walked into a notary public office in Vancouver and attempted to re-finance a mortgage on a property located at [Personal Information] for approximately \$235,000. [Personal] introduced himself as [Personal Information] and presented a fake BCDL at the notary office. [Personal Information] presented his documents for verification and said he would have his friend interpret for him, as his English was poor. [Personal Information] friend (later identified as [Personal Information]) walked into the office and attempted to interpret the ongoing conversation to [Personal Information].
102. The notary became suspicious about [Personal Information] identity, as she thought that he did not look like a 76-year old man. The notary had her partner call the police. In the meantime, [Personal] returned to the office in the company of another Asian male, who was later identified as [Personal Information] and asked [Personal] if everything was 'OK' to which he responded 'Yes'. The accused males then entered a brief conversation in what the notary believed Cantonese, after which [Personal Information] left the office.
103. Vancouver Police officers arrived and arrested all three male suspects. [Personal Information] stated, "Don't arrest me, I really need the money, I need to pay them back."
- 103.1. [Personal Information] comment suggest that he was acting as a nominee.
104. Vancouver Police spoke with the real [Personal Information] who stated that he had no outstanding debt on the property and had lived there for the past 17 years. [Personal Information] had no intention to sell or re-finance his property.
105. The financial victim in this transaction was Antrim Investment Ltd. [Personal Information] the principal of Antrim Investment Ltd, advised Vancouver Police that he received the mortgage application from Grant CURTIS of Dominion Lending. [Personal] gave Vancouver Police a copy of the mortgage application. The front page of the application contained the Dominion Lending

Centre logo accompanied by Grant CURTIS information and the name of the referral as Eathan SKWIRA.

106. The intended recipient of the mortgage proceeds was [Personal Information]. According to the FICOM, the principal of this business was [Personal Information]. [Personal Information].
107. Vancouver Police interviewed CURTIS. CURTIS confirmed that he did forward the application to Antrim Investment; however, CURTIS claimed that he never met [Personal Information]. CURTIS stated he received the file from Ethan SKWIRA. SKWIRA received the mortgage application from a person named [Personal Information]. No one claimed to have ever met [Personal Information].
108. Vancouver Police charged [Personal Information] for personation but were unable to charge CURTIS or SKWIRA for their roles.

### Money Laundering Scheme - Surrey File #2011-141208

109. In October 2011, members of a Persian organized crime group arranged for Sulaiman SAFI, a self-professed money launder, to launder funds for them. The plan was to have SAFI convert approximately \$400,000 cdn to American currency. SAFI took the money to Eathan SKWIRA's residence [Personal Information]. [Personal Information]. SAFI planned to transfer the money on October 12, 2011. However, a Blackberry outage disrupted communication between SAFI and his associates, so SAFI decided to abort the transfer and get the money back to the Persians. SAFI contacted SKWIRA to get the cash ready for pickup. SKWIRA told SAFI that he had already cycled some of the money into other illegal transactions and could not retrieve the balance immediately.
110. Meanwhile, the Surrey RCMP Gang Task Force received information that a large quantity of money would be moved out of a house located at [Personal Information]. [Personal Information] and placed the house under surveillance. SKWIRA rented and occupied this house.
111. The house at [Personal Information] is owned by [Personal Information].
112. On October 13, 2011, three men, [Personal Information] and Sulaiman SAFI went to the house. [Personal Information] and Sulaiman SAFI drove a vehicle registered to Grant CURTIS and [Personal Information] left in a

taxi with \$380,000 in cash in a bag. Police stopped both vehicles and seized the bag with the cash.

113. [Personal Information] is an associate of [Personal Information]

113.1. Recall, in the Boat Loan Fraud (Vancouver Police File # 2010-180994) [Personal Information] was the name of the purchaser.

114. An individual named [Personal Information] (Sulaiman SAFI's business partner) came forward claiming the money belonged to him. The seized money became the subject of a Proceeds of Crime investigation with Surrey RCMP.

### **Fraudulent Transfer of Vehicle Registration - Coquitlam RCMP File #2012-26142**

115. On September 19, 2012, [Personal Information] filed a complaint with Coquitlam RCMP alleging Eathan SKWIRA fraudulently transferred of title to a 1969 Chevrolet Corvette from [Personal Information] company, [Personal Information] to SKWIRA.

115.1. [Personal Information] is a client of Grant CURTIS.

116. [Personal Information] claimed he purchased the corvette from his friend, [Personal Information] [Personal Information]

116.1. [Personal Information] is a client of CURTIS.

117. [Personal Information] estimated value of the vehicle, with the original motor, was \$35,000.00, and, without the original motor, at \$25,000.00. [Personal Information] wanted to get the original motor. In 2011, [Personal Information] referred [Personal Information] to SKWIRA who supposedly had taken care of the vehicle while it was in [Personal Information] possession. [Personal Information] called SKWIRA and asked him to find the original motor. SKWIRA said he knew the original owner of the vehicle and that the original motor was sitting in his garage.

118. SKWIRA told [Personal Information] the work would be a total of \$8,000.00. [Personal Information] gave SKWIRA \$4,000.00 in cash. [Personal Information] also had a credit of \$4,000.00 from [Personal Information]

119. On January 7, 2012, SKWIRA approached an insurance broker to transfer the vehicle title from [Personal Information] to SKWIRA. SKWIRA wanted to gift the vehicle from [Personal Information] to his name. The broker told

SKWIRA that a vehicle transferred from a business could not be "gifted." SKWIRA gave the purchase price as \$1,000.00. SKWIRA produced the original registration and transfer forms. The signature of [Personal Information] was missing on the transfer papers and, where a signature was required for the seller, a name was printed. SKWIRA paid in cash for the transfer of title.

120. On January 7, 2012, SKWIRA sold the vehicle to [Personal Information] for \$12,000.00. [Personal Information] paid by certified cheque, which [Personal Information] produced to Coquitlam RCMP.
121. When first approached by police, [Personal Information] claimed he sold the vehicle but could not recall the name of the purchaser. [Personal Information] later admitted he lied in order to prevent the police from seizing the vehicle.
122. The vehicle was located at [Personal Information] BC, which is also [Personal Information] residence. Coquitlam RCMP interviewed [Personal Information] who said that [Personal Information] owns [Personal Information]. He met SKWIRA through a business neighbor but did not provide a name. [Personal Information] stated he also remembered SKWIRA advising him that he wanted to sell the vehicle because he needed money to pay a real estate deal. [Personal Information] also claimed that he heard from friends that SKWIRA owed money to people.
123. [Personal Information] had described the vehicle as "mint condition" and "the only thing that needed was the number's matching order." TERSPMA claimed he put approximately \$18,000.00 into the vehicle. When recovered by police, the IDENT report described the vehicle as missing four tires, engine, steering wheel, both seats, hood removed and sitting in place, trunk compartments behind driver's seat jammed.

## FINTRAC Information

124. [R5 - PII] involving Ethan SKWIRA and [Personal Information]
  - 124.1. On November 25, 2008, SKWIRA made two cash deposits, \$5,000.00 CAD each. One deposit to an account held by [Personal Information] and one to account held by Eathan SKWIRA.



- 124.2. On February 10, 2009, an individual named [Personal Information] transferred \$10,000 CAD, through an ordering institution in Switzerland, to the benefit of [Personal Information].

## SAFI, SULAIMAN

### BACKGROUND

125. Sulaiman SAFI is a self-professed money launderer and is an associate of Eathan SKWIRA and Grant CURTIS.
126. In December 2011, SAFI voluntarily surrendered himself to the U.S. authorities without an extradition hearing. He received a six-year sentence after pleading guilty to being involved in a scheme to traffic seven kilograms of cocaine and 20 kilos of ecstasy.
127. While serving his sentence in the United States, the RCMP approached SAFI and asked him if he would be willing to provide a statement regarding his activities with SKWIRA and CURTIS. SAFI declined, but later said he would but wanted to be relocated to Canada to serve the remainder of his sentence. The US authorities were approached but declined.

### CRIMINAL HISTORY

#### Theft from MV under \$5000

128. On May 10, 2010, Sulaiman SAFI (aka Sulaiman Stephens) reported to Surrey RCMP that the front plate [Personal Information] was stolen.
129. [Personal Information] was attached to a 2004, black, Porsche Cayenne. The registered owner of this vehicle was [Personal Information] (Grant CURTIS' wife).

#### Possession of Cannabis

130. On October 13, 2011, Surrey RCMP members stopped a black 2004 Porsche Cayenne, bearing [Personal Information] after a burned out headlamp was observed.

131. The driver was [Personal Information] and the passenger as Sulaiman SAFI (aka Sulaiman Stephens). Sulaiman SAFI told the investigator that the vehicle belonged to his friend. The vehicle was leased to Grant CURTIS and [Personal Information].
132. When the Surrey members smelled marijuana emanating from the vehicle, both parties arrested for possession. A search of the vehicle revealed one gram of marihuana, six cell phones, a money-counting machine, and numerous empty wrappers and beverage containers. They were released without charges. [Personal Information] issued a violation ticket for failing to display "N" sign and operating a motor vehicle without illuminated lamp.
133. [Personal Information] told an RCMP investigator the following:
- 133.1. [Personal Information] used to run a drug line in Burnaby for which he was charged. (Burnaby File 2005-26431). [Personal Information] and his crew were in competition with the Red Scorpions.
  - 133.2. [Personal Information] is out of the game unlike some of his friends (nodded his head back to a backup RCMP vehicle where Sulaiman SAFI was lodged).
  - 133.3. The money-counting machine belonged to Sulaiman SAFI as he used to own a "heat clothing line."

#### Nanaimo RCMP File 2011-2456/ FICOM investigation:

134. The complaint [Personal Information] sought financing to purchase [Personal Information].
135. [Personal Information] was unable to obtain sufficient financing and the seller of the property, [Personal Information] referred [Personal Information].
136. [Personal Information] represented himself as a mortgage broker. [Personal Information] referred [Personal Information] mortgage to [Personal Information] a registered sub-mortgage broker with [Personal Information] who obtained financing from [Personal Information].
137. [Personal Information] told FICOM investigators:

- 137.1. His business partner was [Personal Information]
- 137.2. [Personal Information] friend (unknown) who worked at a [Personal Information] introduced him to [Personal Information]
- 137.3. [Personal Information] referred him a number of mortgage applications including an application from [Personal Information]
- 137.3.1. Grant CURTIS submitted an application for [Personal Information] to Antrim on April 15, 2011 and the name [Personal Information] appeared in reference to another mortgage on the DLC payroll documents for CURTIS.
- 137.4. [Personal Information] believed that [Personal Information] co-brokered [Personal Information] mortgage application with a [Personal Information]
138. SAFI is not a registered sub-mortgage broker; appeared to be the controlling mind behind [Personal Information] a purported lending business, which was not registered.
139. FICOM investigators received an email from [Personal Information] with a copy of [Personal Information] mortgage application that was on CURTIS' DLC letterhead.
140. [Personal Information] told FICOM investigators that [Personal Information] mortgage application came from [Personal Information] and that he never dealt nor had ever met Grant CURTIS.
141. A FICOM Investigator met with Grant CURTIS about [Personal Information] CURTIS stated:
- 141.1. He once worked out of the same office as Sulaiman SAFI and [Personal Information]
- 141.2. He never met [Personal Information] nor has he ever heard of him.
- 141.3. [Personal Information] was a former client of his.
- 141.4. [Personal Information] had sought his assistance to help her obtain a second mortgage, however he was unable to help her obtain financing.

## Surrey File #2011-141208 – Proceeds/Civil Forfeiture:

142. Surrey Gang Task Force (SGET) received information that a black or blue Porsche Cayenne with an unknown plate would be in the area of 68 Avenue and 191 Street and that they would be leaving the area with a large sum of money.
143. On October 13, 2011, SGET placed the area under surveillance. Taxi #31 was dispatched to [Personal Information]. The house at [Personal Information] is owned by [Personal Information] but rented to Eathan SKWIRA.
144. [Personal Information] and Sulaiman SAFI were waiting in front of the house and indicate for taxi driver to drive down the back alley to the detached garage. The taxi drove around to the rear and was met by [Personal Information] and SAFI in front of an open overhead garage door. [Personal Information] climbed into the passenger seat, while [Personal Information] and SAFI load a bag into the trunk of the taxi. [Personal Information] left in the taxi, while [Personal Information] and SAFI left in [Personal Information] a black 2004 Porsche Cayenne.
145. SGET members stopped [Personal Information] a black 2004 Porsche Cayenne on the 17900 block Fraser Hwy Surrey BC, after a burned out headlamp was observed. Driver identified through valid BCDL as [Personal Information] and the passenger through valid BCDL as Sulaiman [Personal Information] (aka Sulaiman SAFI). Vegetative odour of marihuana emanating from the vehicle, both parties arrested for possession. Search of the vehicle (including use of Police Dog Services) revealed one gram of marihuana, six cell phones, a money-counting machine, and numerous empty wrappers and beverage containers. Marihuana seized no-case, both parties released no charge, and [Personal Information] issued a violation ticket for failing to display "N" sign and operating a motor vehicle without illuminated lamp.
146. SGET stopped the taxi in 17200 block of Fraser Hwy. The taxi driver told police that the passenger had placed a large bag in the back of the vehicle. The police opened the bag and observed a large sum of money and advised Cst MUENCH of the money. The police arrested [Personal Information]
147. [Personal Information] admitted he had no income source that would account for the monies in his possession. [Personal Information] refused to speak about the monies or answer any questions surrounding the activities. [Personal Information] retained a lawyer,

- Personal Information who requested information in regards to the file to determine possible course of action in relation to the seized monies.
148. Personal Information identified himself as the owner of the monies seized. Personal Information claimed to be a businessman that has done millions of dollars worth of contracts over the last 5 years (Prior to that he was a drug dealer since the age of 12 as he stated in an interview to promote his book.) Personal Information stated that he keeps \$400,000 to \$500,000 cash in a safe at his apartment that he utilizes sort of like a "petty cash" to pay employees and suppliers. The cash was from cash withdrawals over the same time period. Personal Information stated that he dropped a suitcase containing \$380,000 cash off with Eathan SKWIRA at his residence to take care of some business expenses while he was travelling to northern BC to bid on some contracts. This all occurred approximately a week prior October 13, 2011. Personal Information stated when he returned approximately two weeks later, SKWIRA told him that the police had his money. Personal Information added that Personal Information worked for him in construction once or twice in the past and that SKWIRA told him that Personal Information was the person who had the money with him when the police seized it. Personal Information stated that he knew SKWIRA for approximately one year and was introduced to SKWIRA by another business associate, Sulaiman SAFI. Personal Information stated that he had prior business dealings with SAFI that resulted in him owing Personal Information over \$80,000. Personal Information still had contact with SAFI and SKWIRA to date, but they don't discuss the money, because Personal Information didn't want to talk about the subject.
149. Personal Information is Eathan SKWIRA's fiancée and the mother of his child. Personal Information told Police that they lived in the residence at Personal Information on October 13, 2011, but was in Tofino on that date. Personal Information said that she, Eathan and the baby left Surrey at 09:00 hours on October 13, 2011 and were away for four days.
150. Personal Information added that she had the credit card receipts for the trip. Personal Information told Cst MOON that a previous tenant, Personal Information, lived at the residence on October 13, 2011 and knew the code to the garage. Personal Information added that they have had issues with the garage door opening on its own in the past, but never had any B&E or theft from the property.
151. Personal Information worked at Personal Information where Eathan SKWIRA was a client (SKWIRA owns multiple custom Harley Davidson motorcycles.) Personal Information told police that he was at work during the time of the

incident, as that was his normal schedule and added that he only had access to the garage of the residence when SKWIRA gave him access to park his bike.

152. Eathan SKWIRA arranged to speak with police but no further information was provided.
153. On October 20, 2011, Sulaiman SAFI was kidnapped in relation to the seized monies. See Vancouver Police Department File # 2011-170962.

#### **Vancouver File 2011-170962**

154. Between October 19, 2011 and October 22, 2011, Sulaiman SAFI was kidnapped after \$400,000 in cash he was tasked with laundering, either disappeared or was seized by police.
155. The events that unfolded were summarized in an article that appeared on [www.bclocalnews.com/new/209431271.html](http://www.bclocalnews.com/new/209431271.html), published on May 29, 2013:
  - 155.1. B.C. Supreme Court Justice Catherine J. Bruce found Richmond's Personal Information guilty of kidnapping, unlawful confinement and extortion. The ruling details how SAFI and a woman named Personal Information struck a bargain whereby large amounts of Canadian funds from illegal sources supplied by Personal Information clients would be transferred by SAFI, through his associates, to the United States and converted to American currency. SAFI was to earn a commission for the work, to be shared with Personal Information SAFI's business partner. Personal Information indicated that the transfers could take place as frequently as once per week, and that the dealings regarding the funds were to be of a clandestine nature and would be laundered into the U.S. The first transfer was negotiated less than two weeks before SAFI's kidnapping.
  - 155.2. Some \$400,000 was transferred through SAFI's associate, Ethan SKWIRA, during a meeting at a mall in Chinatown. But plans to transfer the money to the United States were derailed thanks to a worldwide Blackberry messenger service outage. "On Oct. 12, the transaction was aborted because service with Blackberry messenger was unavailable throughout the world and this service was essential for the transfer of the money to the U.S.," the court ruling states. The service disruption also hampered communication between SAFI and

Personal Information [REDACTED] who was monitoring the transaction, and his associates. SAFI reached his contacts in the U.S. who were going to receive the funds and carry out the transfer on Oct.13, but there wasn't enough time to complete the deal that day. So because Personal Information [REDACTED] and Personal Information [REDACTED] were upset about the failed transfer, SAFI decided to cancel the transaction and get the money back to them. And that's when the deal started to really fall apart. SAFI contacted Ethan to get the cash ready for pickup, but Ethan had already cycled some of the money into other illegal transactions and couldn't retrieve the balance immediately. What remained appeared to be \$265,000.

- 155.3. To ensure neither he nor his associates were linked with the cash, SAFI called for a taxi for another man, who agreed to go with the money, while SAFI followed in his own Porsche. That's when both vehicles were stopped by the police. SAFI was released, but the police search uncovered the cash in a large suitcase-amounting to \$283,860, including a small amount of America currency-which was seized. That night, SAFI met with Personal Information [REDACTED] and others to explain what happened, but Personal Information [REDACTED] doubted his version of events. "She became very angry and accused SAFI of masterminding the theft of the money from her clients," the court ruling states. Efforts to get the cash returned from police, as well as the outstanding money from Ethan, proved fruitless over the next several days for both SAFI and Personal Information [REDACTED].
- 155.4. On October 20, 2011, during a meeting at the Personal Information [REDACTED] in downtown Vancouver, SAFI was instructed to get into a vehicle, had a black ski mask placed over his head, was handcuffed behind his back, and had a taser held to this head. SAFI was taken to an industrial complex in Richmond, at Personal Information [REDACTED] where he was placed in a room where he was handcuffed and zap strapped to a chair. His captors threatened at one point to start cutting off SAFI's fingers. SAFI said he had contacts who could get him 10 kilograms of cocaine, which he would give to his captors. SAFI's captors learned that SAFI's wife had contacted police, and that she was freaking out.
- 155.5. "Even though they had not yet received any money from his associates, the main guy told SAFI that he would be released. SAFI was eventually put in the back seat of a vehicle, had a black ski mask

placed over his head, and driven to a location on Highway 91. "SAFI was instructed to get out but not to take the mask off right away and to sit on the meridian. He took off the white hoodie before leaving the vehicle, and sat on the meridian as instructed while the Mazda drove off. Thereafter he immediately took the ski mask off and started running across the highway and scrambled up the embankment to the other side. He was running toward a bus stop when he threw the mask away. Almost immediately thereafter, SAFI was stopped by two members of the Vancouver Police strike force and taken into their police vehicle," the court ruling said.

- 155.6. Vancouver Police surveillance teams had been watching the events at the front entrance of the No. 5 Road building on Oct. 21 since 11 a.m., the morning after SAFI's wife alerted police to the possible kidnapping. Police already had viewed video surveillance footage from the Personal Information Personal Information with restaurant manager.
- 155.7. "From the surveillance footage Personal Information identified Personal Information Personal Information as a well-known customer who was related to the owner." A police database search linked Personal Information to a business at the address where SAFI was held on No. 5 Road.
- 155.8. North Vancouver's Personal Information was acquitted of all charges in the kidnapping.
- 155.9. Abbotsford's Personal Information was convicted of kidnapping, unlawful confinement, extortion, and uttering threats.
- 155.10. Surrey's Personal Information was found guilty of kidnapping and unlawful confinement.
- 155.11. Kamloops' Personal Information was found not guilty of all charges.
- 155.12. Kamloops' Personal Information was found guilty of three weapons-related offences as well as kidnapping, unlawful confinement, extortion with a firearm, using a firearm while committing an unlawful confinement, pointing a firearm and uttering a threat.



- 155.13. **Personal Information** was convicted of kidnapping and unlawful confinement.
156. Points of interest from B.C. Supreme Court Justice Catherine J. Bruce's Judgement:
- 156.1. SAFI contacted SKWIRA and told him to get the money ready for pickup; however, only about \$300,000 of the funds was still in SKWIRA's hands. He [believed meaning SKWIRA] had "cycled" the money into other illegal transactions and could not retrieve the balance at that time.
- 156.2. After the police seized the cash SAFI made attempts to recover the balance of the monies (approximately \$140,000) from SKWIRA.
- 156.3. **Personal Information** advised SAFI that she was also communicating directly with SKWIRA regarding the return of the balance of the monies. None of their efforts were successful.
- 156.4. When SAFI was kidnapped, SAFI's captors said they believed SAFI stolen their money and wanted \$1 million from SAFI. SAFI told his captors that he had about \$40,000 to \$50,000 in **Personal Information** business account and he could take steps to get SKWIRA to return the balance of the money if he was released. SAFI proposal was rejected as his captors wanted the money now. They told SAFI that knew SAFI's family was wealthy, that they had been watching him and knew where his family lived and threatened SAFI with physical harm. SAFI and his captors reached an agreement whereby SAFI would give them 10 kilos of cocaine (explaining to his associates [SKWIRA's] that he lost the cocaine or give them some other excuse). The cash amount owed was reduced from \$1 million to \$500,000 but his captors wanted some cash up front before releasing SAFI.
- 156.5. On October 20, 2011 **Personal Information** communicated with another person and they appeared to be concerned about SAFI's circumstances. **Personal Information** commented that they would not kill SAFI because then they would not get their money.

- 156.5.1. [Personal Information] could possibly be [Personal Information] - two individuals who SAFI mentioned in his statement to the Vancouver Police in the 2012 interview.
- 156.6. Another of [Personal Information] cellular phones had a contact number for [Personal Information] and for [Personal Information]
- 156.6.1. [Personal Information] is associated to SAFI's business [Personal Information]
- 156.7. SAFI's cell phone was taken from him during his kidnapping between October 18 and October 21. Text messages were recovered. The text messages recovered during SAFI's captivity show:
- 156.7.1. October 20, 2011 at 19:39: [Personal Information] (SKWIRA) sent a message to SAFI asking where he was.
- 156.7.2. October 20, 2011 at 20:44: SAFI purportedly sent a message to [Personal Information] saying , "Hey sorry bro I was out of town for a few days. Got a buddy looking for 5 hh trips. U able to get? Stamps and tags to if cool."
- 156.7.3. October 21, 2011 (4 hours after the last message of October 20, 2011 at 20:44): Purportedly from SAFI to Surge (SKWIRA): "Hey can u get ahold of [Personal Information] take to lawyer tmrw 1st thing to claim the cash. I need a receipt for it asap. And tell my wife to chill or she put me in danger. Calling cops make me look like a rat."
- 156.7.4. October 21, 2011 at 09:39: Tbone to [Personal Information] "Hey do u have my d's phone number bro?" [Personal Information] replied that he did not have the telephone number.
- 156.7.5. October 21, 2011 at 09:50: TBone messaged [Personal Information] about contacting the lawyer, "Where u able to go to lawyer with dennis? My wife has number. And tell her I lover. I will call soon trust me I'm well taken care off and I love her. Please

pass msg asap bro. I don't have a phone it died. Tell [m] I am safe. Not more worries.

156.7.6. What followed was a lengthy exchange of messages between [Personal Information] and TBone and "Light" and TBone.

156.8. Evidence suggests that one of SAFI's captors had SAFI's cellular telephone and had examined SAFI's messages and now believed SAFI had not stolen the money. This was corroborated by the messages recovered from SAFI's cellular telephone by the police. "The messages going back and forth between SAFI and his associated involved in the money laundering track how the money was seized by the police and SAFI's efforts to recover it through his lawyer. Further, the messages sent on the cellular telephone after it was taken from SAFI are of a different character and the context indicates someone else must have sent them. In particular, SAFI would not have needed to obtain [Personal Information] telephone number and the messages referred to [Personal Information] as [Personal Information] which is different from SAFI's earlier messages that refer to [Personal Information] as [Personal Information]. The author of the messages did not appear to now that [Personal Information] was out of own, which SAFI knew about according to the responsive texts from [Personal Information]. The fact that [Personal Information] now believed SAFI about the police seizure of the money is evident in the messages because he appears to want to know how the recovery from the police is progressing and wants to know who has seen the lawyer. In addition, SAFI's testimony that on the morning of October 21 [Personal Information] advised him they could not release him until they had some cash in hand is corroborated by the text messages on SAFI's cellular telephone at this time that seek to recover the remaining monies from [Personal Information]."

156.9. The Judge's assessment of SAFI's character:

156.9.1. "SAFI is clearly a person of questionable moral character; he is currently serving a lengthy sentence in the U.S. for distributing cocaine and ecstasy in very large quantities. SAFI was not a mere courier; he played a high level role as a broker for the transactions and exchanges that occurred between 2009 and 2011. Although this is the only

conviction on his record, SAFI acknowledged that he had been involved in criminal activities for the past ten years. His crimes included drug trafficking and, significantly, offences involving dishonesty such as bank and credit card fraud, as well as money laundering."

- 156.9.2. In addition, SAFI lived a criminal lifestyle. While he testified that criminal activities generated only a small percentage of his income, with the largest share coming from lawful transactions involving mortgage brokerage, it is difficult to accept this evidence as truthful when assessed against the whole of his testimony. Financial brokerage was a recent business venture for SAFI and he had no formal training or professional qualifications in this type of work. Although he had been in business for over a year, he had not made sufficient profits to warrant incorporating a company to carry on this business. On the other hand, SAFI represented to Personal Information that he could launder large amounts of cash through his U.S. contacts on a weekly basis and he appeared to have extensive knowledge and expertise in laundering money through the use of Blackberry messenger. His text messages were also replete with references to drug trafficking involving substantial amounts of cocaine and ecstasy.
- 156.9.3. He [SAFI] was both careful and sophisticated. He was very careful to insulate himself from detection by the police in a wide variety of circumstances. He drove a Porsche that was leased by a friend; he obtained a driver's licence in his wife's family name; he used encrypted Blackberry cellular telephones for drug transactions and money laundering; and he owned properties registered in other peoples' names.
- 156.9.4. In my view, the way SAFI handled the money laundering transaction that became the incentive for his alleged kidnapping clearly illustrated his sophisticated criminal lifestyle and behaviour. SAFI used the encrypted

Blackberry cellular telephones to discuss the transaction except during the Blackberry messenger blackout in mid-October 2011; he did not transport the money but followed Person al who had the cash and bore the risk of detection by the police. When the transaction went awry, he drove to SKWIRA's residence with Person al but had another friend take the money in a taxi so that he could not be caught with it. When the taxi and SAFI's Porsche were stopped by the police, SAFI was able to delete all the data from his cellular telephone that could implicate him in the money laundering before the officer reached the car door. Lastly, to retrieve the seized money from the police, SAFI arranged for Person al to falsely claim the money was his and he hired a lawyer to make the claim.

- 156.9.5. SAFI lied under oath to the police. It was not until August 2012, after SAFI received a letter from the Crown indicating they would not prosecute him for money laundering in connection with the events giving rise to the alleged kidnapping, that he decided to tell the truth about his involvement with the money laundering and drug trafficking.
- 156.9.6. SAFI obtained a letter from the Crown that they would write to the U.S. authorities after he completed his evidence outlining the "facts and circumstances of his full and forthright co-operation with the Crown in the prosecution of the persons charged with his kidnapping." SAFI believed that this letter would be useful in connection with his application to serve his sentence in Canada.
- 156.9.7. Although he received Crown immunity from prosecution for the money laundering leading to the kidnapping, SAFI was acutely aware that the police could decide to investigate other criminal acts he described during his testimony at trial. Nevertheless, he was surprisingly frank about his past criminal misconduct.

- 156.9.8. SAFI did voluntarily surrender himself to the U.S. authorities in December 2011 without an extradition hearing and pleaded guilty to the offence.
- 156.9.9. The judge found SAFI's evidence credible and reliable, for the most part, notwithstanding the inherent dangers in accepting the testimony of a person of his bad character.

## CLIENTS AND ASSOCIATES

Personal Information

157. According to Dominion Lending Centres payroll records, an individual by the name of [Personal Information] received referral fees from CURTIS for the following clients:
- 157.1. [Personal Information] 2010-08-26
  - 157.2. [Personal Information] 2010-08-31
  - 157.3. [Personal Information] 2010-09-17
  - 157.4. [Personal Information] (no other information available)
158. The property associated to [Personal Information] that is, [Personal Information] BC, appeared on a Google search as a "sold" listing on a webpage for a realtor by the name [Personal Information]. This individual works for [Personal Information] in Burnaby. It is possible that [Personal Information] is in fact the [Personal Information] who received the referral fee. This is unconfirmed.
159. The FICOM investigator speculated that this might be [Personal Information] who was the primary suspect in the murder of [Personal Information] in Maple Ridge. This is unconfirmed.

Personal Information

## Second Mortgage

160. Personal Information was a client of Grant CURTIS. Personal Information was the registered owner of Personal Information
161. On April 5, 2011, Personal Information applied for a second mortgage. There were five previous mortgages on the property held by Personal Information. Two of the mortgage providers, Personal Information and Personal Information, filed civil suits against Personal Information
162. On May 1, 2015, BC Supreme Court ruled on the Personal Information civil suit (Normak Investments Ltd v. Belcuig 2015 BCSC 700):
- 162.1. The plaintiff, Normak Investments Ltd. (Normak) is in the mortgage lending business.
  - 162.2. In May 2011, Normak loaned \$70,000 to the defendant, Personal Information. Personal Information secured by a second mortgage on residential premises owned by Personal Information
  - 162.3. The loan was brokered by Personal Information a mortgage broker and an employee of the Personal Information
  - 162.4. Normak retained a notary public to act on its behalf, including preparation and registration of a second mortgage securing its loan to Personal Information
  - 162.5. A lawyer with the firm Personal Information acted for Personal Information
  - 162.6. After the funds were advanced, it was discovered that a mortgage statement, purporting to be on the letterhead of the first mortgagee, Personal Information and showing the balance of the first mortgage to be less than \$218,000, was a fraud. The balance owing under the first mortgage was substantially more than \$218,000.
  - 162.7. Normak advanced the funds, believing there to be sufficient equity in the property. In fact, there was virtually no equity in the property when the plaintiff advanced the loan.

- 162.8. In 2012, [Personal Information] foreclosed on the property. The proceeds of the sale were insufficient to cover the amount owing under the first mortgage. As a consequence, Normak received nothing towards the payment of its second mortgage.
- 162.9. The Court found that Sulaiman SAFI orchestrated the fraud. [Personal Information] was SAFI's puppet, but was complicit in the scheme.
163. Points of interest from the Reasons for Judgment in the Normak Investments Ltd v. Belcuig 2015 BCSC 700 case:
- 163.1. On May 5, 2011, SAFI referred [Personal Information] to [Personal Information]. SAFI represented [Personal Information] as being interested in securing financing by offering a second mortgage on residential premises she owned in Port Coquitlam.
- 163.2. [Personal Information] never personally met with [Personal Information]. He spoke to her over the phone. He said he tried to get as much information from her as he could to prepare her mortgage application, but [Personal Information] told [Personal Information] she did not speak English very well and referred [Personal Information] to SAFI. [Personal Information] told [Personal Information] that SAFI had her information, and the paperwork should go to him. [Personal Information] said most of the information he obtained and recorded on the [Personal Information] mortgage application form came from [Personal Information] but he could not be certain exactly which information came from [Personal Information], and which information came from other sources, including SAFI. [Personal Information] claimed never to have seen the mortgage application form. She denied signing the application or any of the forms prepared by [Personal Information]. It is likely [Personal Information] sent these forms to SAFI who affixed [Personal Information] signature to the documents before returning them to [Personal Information].
- 163.3. The mortgage application contained false particulars about [Personal Information] on material points, including that:
- 163.3.1. she was employed at [Personal Information] and [Personal Information].
- 163.3.2. she earned about \$70,000 in employment income per year; and,



- 163.3.3. she held assets totalling \$25,500, including money in an RRSP and a 2006 Honda Civic.
- 163.4. [Personal Information] did not work at [Personal Information]  
[Personal Information]
- 163.5. [Personal Information] did not own the assets set out on the mortgage application.
- 163.6. [Personal Information] did not even hold a driver's licence.
- 163.7. On examination for discovery, [Personal Information] denied providing this false information to [Personal Information] in support of her loan application.
- 163.8. Regardless of whether the false information on the loan application was supplied by SAFI or [Personal Information] did nothing to confirm that information.
- 163.9. On examination for discovery, [Personal Information] said it is his practice to verify information on "A" files (or mortgage applications to be sent to banks) but not on "B" files (second mortgage applications). He said second mortgage lenders do not require verification of a prospective borrower's employment information. He said that is what second mortgage lenders "said to us whenever we talk, whenever we meet."
- 163.10. [Personal Information] had on file an appraisal dated March 11, 2011 valuing the property at \$451,000. [Personal Information] said the appraisal could have come from SAFI.
- 163.11. [Personal Information] also had a mortgage statement dated March 15, 2011 reflecting an amount said to be owed by [Personal Information] under the first mortgage held by [Personal Information]. [Personal Information] said this statement was provided to him by SAFI. The statement, which is unsigned, purports to be on [Personal Information] letterhead and is addressed to [Personal Information] at her Port Coquitlam address. The statement reflected that the amount owing under the first mortgage was, as of March 15, 2011, slightly over \$218,000. [Personal Information] made no inquiries as to the provenance or accuracy of this mortgage statement.
- 163.12. The mortgage statement was a forgery. Although purportedly addressed to her, [Personal Information] said she had never seen the mortgage

statement. She said the fax number to which the document appeared to have been sent was SAFI's.

- 163.13. The amount of the mortgage was \$70,000 with a fixed rate of interest at 12.5% per annum. [Personal Information] earned a mortgage broker fee of \$6,300 and normally given 90% of the broker's fee with 10% going to [Personal Information]. In this transaction, [Personal Information] and his partner at [Person] split \$3,000 in commission. SAFI was paid \$2,670.
164. The court ruled [Personal Information] knew that her first mortgage balance at the time of this transaction was approximately \$400,000, and that [Personal Information] must have known there was insufficient equity in the property to support a \$70,000 second mortgage. In fact, [Personal Information] testified on examination for discovery she was only seeking a \$20,000 loan for home repairs, and was "pressured" by SAFI to request the \$70,000 loan because SAFI needed the money. [Personal Information] denied ever seeing with the forged mortgage statement dated May 17, 2011. She did acknowledge, however, being taken to the lawyer's office by SAFI and signing off on the \$70,000 mortgage to Normak. SAFI waited outside in his car. The lawyer had no recollection of ever meeting SAFI and had not previously acted for him.

## Background/Associates

165. According to Land Title documents, [Personal Information] is married to [Personal Information].
166. [Personal Information] owned two properties:
- 166.1. [Personal Information] There are four previous mortgages on the property before it was sold in 2011.
- 166.2. [Personal Information], which was purchased on April 27, 2010 for \$577,000 - Title# CA1537206.
167. In February 2012, [Personal Information] and her children were found inside a home where a grow operation was being run by [Personal Information] was convicted under CDSA for Production of a Controlled Substance. (Ridge Meadows RCMP File #2012-3978 refers.)

168. [Personal Information] surfaced in relation to another FICOM investigation involving an individual by the name of [Personal Information] and his business, [Personal Information] who were investigated for a suspected of mortgage fraud.

168.1. Sulaiman SAFI is associated to [Personal Information] and considered the controlling mind of this company.

168.2. Grant CURTIS shared an office with [Personal Information] FICOM investigators interviewed Grant CURTIS. Grant CURTIS stated that he knew [Personal Information] from his friend Ethan SKWIRA.

[Personal Information]

169. [Personal Information] was a recipient of a referral fee on DLC payroll documents for a client noted on one of the mortgages brokered by Grant CURTIS. No other information provided on this person nor were there any details on the mortgage.

170. However, [Personal Information] is a friend of Grant CURTIS on CURTIS' Facebook Page.

171. According to a CPIC entry, [Personal Information] (previously known as [Personal Information] resides in Richmond at the same address as [Personal Information] likely spouse.

[Personal Information]

172. In 2010, [Personal Information] was looking for a second mortgage of \$200,000 with Antrim Investments on his principle residence in Richmond.

173. According to an email from Grant CURTIS to [Personal Information] of Antrim, the first mortgage was with the [Personal Information] for \$800,000.

174. [Personal Information] valued the property on [Personal Information] BC at \$1,350,000.

175. There was no documentation to indicate whether the second mortgage loan was granted to [Personal Information]

## Background/Associates

176. [Personal Information] is a Mobile Mortgage Specialist with [Personal Information] and resides in Richmond, BC.
177. [Personal Information] was a co-covenantor on a 2009 mortgage for a property owned by Grant CURTIS at [Personal Information] (Grant CURTIS' current residence)
178. [Personal Information] owns the house that was rented by Eathan SKWIRA; that is, [Personal Information]
- 178.1. In 2009, First National Financial provided finance for this house.
- 178.2. SKWIRA met with Sulaiman SAFI and other associates at this residence to pick up/transport laundered money. See 'Sulaiman SAFI' for details.
179. [Personal Information] referred the following clients to Grant CURTIS:
- 179.1. [Personal Information]
- 179.2. [Personal Information] first name not provided.
- 179.3. [Personal Information] first name not provided but believed to be [Personal Information]. See [Personal Information] for details.

[Personal Information]

180. [Personal Information] were clients of CURTIS.
181. [Personal Information] ("the [Personal Information] brothers") are co-owners of [Personal Information] each holding an undivided 50/100 interest and have been so since May 12, 2005. [Personal Information] held the mortgage.
182. The house at [Personal Information] was the site of a medical marijuana grow operation.

183. In September of 2008, the [Personal Information] brothers sought a second mortgage for \$200,000 through Grant CURTIS and DLC Mountain View. DLC arranged for an appraisal. [Personal Information] valued the property at \$1,350,000.
184. Grant CURTIS contacted Antrim Investments Ltd [Personal Information] Antrim Investments financed the second mortgage through [Personal Information] a company managed by Antrim Investments Ltd.
185. On October 6, 2008, the [Personal Information] brothers borrowed \$200,000 from [Personal Information] [Personal Information] for one year at an interest rate of 11.5%.
186. As of October 28, 2008, the principal amount of the first mortgage with [Personal Information] [Personal Information] was \$796,320.
187. In April of 2010, a new appraisal was done of the property; this time by [Personal Information] [Personal Information]. The property was valued at \$1,550,000.
188. In May of 2010, the [Personal Information] brothers renewed the second mortgage with Antrim Investments and an additional \$125,000 was advanced. The new mortgage was registered with the Land Title Office at \$325,000 at an interest rate of 11.5%.
189. A cheque for \$3,303 from [Personal Information] to [Personal Information] [Personal Information] was NSF.
190. In April of 2011, Antrim contacted their lawyer about sending a Demand Letter to [Personal Information] seeking arrears of \$14,619.
191. On April 20, 2011, [Personal Information] filed a Bankruptcy and Insolvency Act Notice of Intention to Enforce Security as a secured creditor on the mortgage (CA1559046). The amount owed was \$341,485.87.
192. In July of 2011, [Personal Information] petitioned to the courts as [Personal Information] [Personal Information] owed \$763,662.59 plus interest and payments were in default.

### Background/Associates

193. [Personal Information] is the owner/manager of [Personal Information]
194. [Personal Information] is a possible associate of [Personal Information] (ex-Hells Angel Nomad).

195. Judgments Registered on title: CRA - [Personal Information] (brother) for \$59,870, [Personal Information] for \$61,003.

### FINTRAC Information

196. On June 6, 2012, [Personal Information] conducted a cash bill payment of \$7,767.79 CAD at [Personal Information]. According to [Personal Information] came in to make a partial payment on a hydro bill with a large balance. The balance on the Hydro bill for May showed past due. [Personal Information] provided valid ID but did not really have an explanation as to why he was paying in cash, mostly \$20's.
197. On July 20, 2012, [Personal Information] returned to the same [Personal Information] location and attempted to complete another cash hydro bill payment. The [Personal Information] employee asked [Personal Information] why it was such a large Hydro bill. [Personal Information] said it was a medical grow op. [Personal Information] asked if it was just the employee asking or if it had to "go in the computer, cause if it was going in the computer then to just say it's a welding shop". To which employee replied, "No, I need to ask a few things about the payment." While the [Personal Information] employee was checking with their Regional Loss Prevention Manager [Personal Information] said he received an important call and had to leave but would be back later. [Personal Information] completed the transaction at another [Personal Information].
198. On the same day, July 20, 2012, [Personal Information] conducted a cash bill payment totaling \$14,755.13 CAD at [Personal Information].

[Personal Information]

199. See the information on [Personal Information] for details.

[Personal Information]

200. On or about August 1, 2011, CURTIS sent an appraisal report to Antrim for preliminary consideration. [Personal Information] was the applicant. The property at [Personal Information] was appraised at \$1.43 million.

201. According to the appraisal invoice, the appraisal was paid with a credit card in the name of [Personal Information] by credit card.

201.1. [Personal Information] is also an associate/client of Grant CURTIS. More information about [Personal Information] is provided in this document.

## Background/Associates

202. [Personal Information] is a close associate and “money guy” for [Personal Information] of the Hells Angel Kelowna chapter.

203. According to Coquitlam RCMP File #2012-26142, on September 19, 2012, [Personal Information] filed a complaint with Coquitlam RCMP alleging that Eathan SKWIRA had fraudulently transferred title of his 1969 Chevrolet Corvette from [Personal Information] company to SKWIRA.

203.1. [Personal Information] was the owner of a black 1969 Chevy Corvette, which he claimed he purchased from his friend, [Personal Information] [Personal Information] Burnaby, BC, was the registered owner of the vehicle. The estimated value of the vehicle with the original motor was \$35,000.00. Without the original motor, the vehicle was valued at \$25,000.00. [Personal Information] wanted to get the original motor.

203.2. According to [Personal Information] in 2011 [Personal Information] friend, [Personal Information] referred [Personal Information] to Eathan SKWIRA who supposedly had taken care of the vehicle while it was in [Personal Information] possession. [Personal Information] called SKWIRA and asked SKWIRA if he could find the original motor. SKWIRA said he knew the original owner of the vehicle and that the original motor was sitting in his garage.

203.3. SKWIRA told [Personal Information] the work would be a total of \$8,000.00. [Personal Information] gave SKWIRA \$4,000.00 in cash. [Personal Information] was also had a credit of \$4,000.00 from [Personal Information]. SKWIRA told [Personal Information] he had an uncle who had a repair shop in Langley.

203.4. On January 7, 2012, SKWIRA presented himself to an insurance broker to transfer the vehicle title from [Personal Information] [Personal Information] BC, to SKWIRA of [Personal Information] [Personal Information] SKWIRA wanted to gift the vehicle from [Personal Information]

Personal Information to his name but was told that a vehicle could not be gifted if transferred from a business. SKWIRA gave the purchase price as \$1,000.00. SKWIRA produced the original registration form and transfer form. Where a signature was required for the seller a name was printed. The signature of Personal Information was missing on the transfer papers. SKWIRA paid in cash for the transfer of title.

203.5. On January 7, 2012, SKWIRA sold the vehicle to Personal Information for \$12,000.00. Personal Information paid by certified cheque, which Personal Information produced to Coquitlam RCMP. When first approached by police about the vehicle, Personal Information claimed he sold the vehicle but could not recall the name of the purchaser. Personal Information later admitted he lied in order to prevent the police from seizing the vehicle. The vehicle was located at Personal Information BC, which is also Personal Information residence. Coquitlam RCMP interviewed Personal Information who said:

203.6. Personal Information owns Personal Information. He met SKWIRA through a business neighbor but did not provide a name.

203.7. Personal Information remembered SKWIRA advising him that he wanted to sell the vehicle because he needed money to pay a real estate deal.

203.8. Personal Information also heard from friends that SKWIRA owed money to people.

203.9. Ultimately the vehicle was returned to Personal Information. Of note, Personal Information described the vehicle as "mint condition" and "the only thing that needed was the number's matching order." Personal Information claimed he put approximately \$18,000,00 into the vehicle. When recovered by police, the Ident Section report described the vehicle as missing 4 tires, engine, steering wheel, both seats, hood removed and sitting in place, trunk compartments behind driver's seat jammed.

Personal Information

204. Personal Information applied for a second mortgage on Personal Information. Personal Information CURTIS was the broker.



205. On or about October 3, 2011, the property at [Personal Information] was appraised at \$680,000. The appraisal was sent to Antrim for preliminary consideration but it is unknown if a mortgage was granted.

### Background/Associates

206. [Personal Information] is associated to [Personal Information] through an exchange of a vehicle. [Personal Information] is a member of the Hell Angels Nomad BC Club.

[Personal Information]

207. [Personal Information] is married to Grant Brian CURTIS.

208. [Personal Information] is the co-owner with Grant CURTIS a property located at [Personal Information]. The property at [Personal Information] was the subject of a search warrant where a marijuana grow-op was located.

209. The Land Title Office record shows "owner address" as [Personal Information]. The owner address of [Personal Information] is the same as Grant CURTIS.

[Personal Information]

### Mortgage Application - [Personal Information]

210. [Personal Information] was a client of Grant CURTIS.

211. On September 29, 2011, an appraisal was referred to Antrim for consideration, but it was unknown if financing was provided.

### Background/Associates

212. The British Columbia Security Commission (BCSC) requested the RCMP Integrated Market Enforcement Team (IMET) to check [Personal Information] in regards to the investigation on [Personal Information] (RCMP File #5000 2013-3204 refers) BCSC suspected [Personal Information] of a pump and dump scheme in which CURTIS was a shareholder. There was no indication as to [Personal Information] role in the inquiry.

213. On June 11, 2009, Langley RCMP Drug Section received a Crimestoppers tip indicating that [Personal Information] was a cocaine and marijuana trafficker who deals large quantities from his home and supplies Langley Dealers.
214. On March 9, 2011, [Personal Information] requested a criminal records check for employment with a Health Canada medicinal marijuana grower application. (AB 2011-10340)
215. On March 9, 2011, then full-patch Nomad, [Personal Information] was observed having lunch at a Boston Pizza in Langley. [Personal Information] left with his meal partner in a vehicle registered to [Personal Information] (RCMP File #5000-2011-5.)
216. [Personal Information] is associated to [Personal Information] who is a member of the Hell Angels West Point Club.

[Personal Information]

217. [Personal Information] was a client of Grant CURTIS. A mortgage was arranged through First National Financial Group on a house located at [Personal Information] [Personal Information]
218. In May of 2010, BC Supreme Court issued an Order for Conduct of Sale in which an undivided half interest of the property at [Personal Information] be offered for sale on and after May 25, 2010, by private sale, free and clear of all encumbrances.
219. On September 13, 2010, the BC Supreme Court on an application by [Personal Information] [Personal Information] ordered the sale of an undivided half interest for the price of \$252,000 to [Personal Information]
220. On September 22, 2010, [Personal Information] entered into a contract of purchase and sale for the purchase price of \$505,000 with the seller [Personal Information] [Personal Information] According to Land Title Office documents, [Personal Information] borrowed \$443,415.25 from First National Financial Group Corporation.
221. On November 5, 2010, [Personal Information] became the registered owner in fee simple.
222. The 2013 Assessed value of the property was \$507,700.00.
223. Unusual aspects of the mortgage transaction as reported by FICOM:

- 223.1. Quick closing date;
- 223.2. Assets show \$100,000 in cash;
- 223.3. The Revenue Canada Notice of Assessment, dated "Jun 22, 2009" has indications it may not be genuine.
- 223.4. The month of June should be spelled "June" not "Jun";
- 223.5. Stated deductions of \$5,630 seem disproportionately high for income of \$15,988;
- 223.6. Spacing and alignment of name and date not in alignment;
- 223.7. Odd to have installment payments with very low total income;
- 223.8. RRSP Deduction Limit Statement should be on separate page;
- 223.9. Similar discrepancies appeared on the tax year 2009 Notice of Assessment, dated May 17, 2010.

### Background/Associates

224. Personal Information works an exotic dancer.
225. Personal Information was the winner of a worldwide talent search for the pornographic site Personal Information is a site where news anchors deliver current events news stories while stripping clothes.
226. Personal Information has done some bit parts in movies and television, the majority of the roles being exotic dancing type roles.
227. Personal Information is associated to Outlaw Motorcycle Clubs; specifically, Personal Information who is a member of the Hells Angels East End Chapter.
228. In 2005, Personal Information was the registered owner of the vehicle that bore the same address as Personal Information (West Vancouver Police File# 2005-98).
229. Personal Information possibly was/is in a common-law relationship with Personal Information with whom she has a son.

230. [Personal Information] was a client of Grant CURTIS.
231. On March 9, 2010, CURTIS emailed Antrim about obtaining a mortgage for [Personal Information] to purchase [Personal Information]. The property was a rental property but there was no information on the tenant.
232. On March 1, 2010, Antrim received a copy of an [Personal Information] mortgage application. Antrim was to be a “back-up” lender.
- 232.1. The intent of the application was to purchase [Personal Information] BC for \$953,000.
- 232.2. The loan principal was \$812,000.
- 232.3. [Personal Information] stated income was \$85,000 per job letter and that he was employed as the Project Site Manager for [Personal Information].
- 232.4. A down payment consisted of a \$41,000 bank draft from [Personal Information] Langley Commercial Banking Centre (unknown whose account this was drawn from) plus \$100,000 as per the purchase agreement and a receipt signed by the vendor [Personal Information]. [Personal Information] The payer not identified on the receipt.
- 232.5. The recipient of the mortgage proceeds was the vendor of the property.
233. Unusual aspects of the mortgage as reported by FICOM:
- 233.1. Quick close – CURTIS emailed Antrim on March 9, 2010. The completion date was March 31, 2010.
- 233.2. CMHC appraised the property at \$900,000; however, the purchase was \$953,000.
- 233.3. The scale of the purchase made no sense for the buyer's indicated income.
- 233.4. No address or other details for buyer on purchase agreement.

- 233.5. Source of down payment is not apparent on any document, including the bank draft for \$41,000.
- 233.6. The realtor did not witness [Personal Information] signature on the purchase agreement.

## Background and Associates

234. [Personal Information] is the President / Secretary and Director of [Personal Information] [Personal Information] which was incorporated 2008.
235. [Personal Information] was carded (ED 5000-2012-4642) in a police investigation relative to money laundering proceeds of crime. That file also cited [Personal Information] is an entity of interest.
- 235.1. The manager of [Personal Information] as referenced by FICOM was [Personal Information]
236. [Personal Information] (possibly son) has strong ties to Hells Angels and criminal element affiliations. [Personal Information] is involved in drug related offences, street level violence, crimes against person and previously been charged with offences under CDSA.

[Personal Information]

237. [Personal Information] assisted Grant CURTIS in many of the mortgages examined by FICOM. Currently, [Personal Information] is a Mortgage Planner at Dominion Lending Centres, City Wide Mortgage Services in Vancouver, BC.
238. According to FICOM, [Personal Information] quit First National after not receiving a raise based on poor audit scores.

[Personal Information]

## Mortgage - [Personal Information]

239. [Personal Information] was a client of CURTIS.

240. On July 21, 2010, **Persona** applied for a mortgage with First National Financial Mortgage. The purchase price was \$545,000 with a down payment of \$27,250.
241. The down payment came in the form of a gift from a third party.
242. **Persona** borrowed \$534,059.12 at 1.9% interest.
243. In July of 2011, the mortgage was transferred from First National Financial to **Personal Information** c/o First National Financial Group.
244. The BC Assessment Roll shows the value of the property in 2010 was \$336,600 and in 2011 was \$278,700.
245. The property operated as a licenced medicinal marijuana grow operation. The operation was flagged as the growing capacity was beyond the existing licences.
246. Unusual Aspects of Mortgage Transaction noted by FICOM:
- 246.1. In the opinion of FICOM, this deal was unreasonable as presented to First National.
- 246.2. "Gifted" Down Payment of \$27, 500 from a **Personal Information** but no relationship to borrower stated. (Usually "gifts" are only accepted if they are from immediate family).
- 246.3. The application did not mention that borrower was the registered owner of **Personal Information** with a **Personal Informatio** mortgage on that property.
- 246.4. The Notice of Assessment had indications it may not be genuine:
- 246.4.1. There was no registration number;
- 246.4.2. Numerous misalignments;
- 246.4.3. RRSP information appears on same page as income. CRA prints this information on a separate page.
- 246.4.4. "Self-Employed income of \$178,635 for "Electronics Technologist" seems too high.
- 246.4.5. Short closing date from date of application.

246.5. No internet footprint for [Personal Information] except Quesnel incident, and nothing for purported businesses (i.e. no business listings or ads)

## Background/Associates

247. On December 2, 2011, Agassiz RCMP (File 2011-35736) arrested [Personal Information] during the execution of a search warrant pursuant to production of a controlled substance under the Controlled Drug Substance Act (CDSA).

248. [Personal Information] was incarcerated at the Mission Institution for a conviction on October 9, 2012, for Break Enter & Commit, Aggravated assault, and Discharge a Firearm with intent. [Personal Information] probable release date is January 30, 2016, and sentence end date is September 24, 2017.

249. [Personal Information] has a common law wife named [Personal Information] who he lives with at their Fort Langley address. [Personal Information] possibly has two previous ex-wives.

250. BC Assessment Authority/Land Titles has the following addresses for [Personal Information]  
[Personal Information]

250.1. [Personal Information] BC; purchased August 12, 2010 for \$545,000.00. Mortgage with First National Financial GP.

250.2. [Personal Information] BC. [Personal Information] (Businessman) as to an undivided 99/100 interest and [Personal Information] (Businessman) as to an undivided 1/100 interest. The property was purchased on November 29, 2002 for \$84,000.00 [Personal Information]  
[Personal Information]

## Associated Companies

251. [Personal Information] with a [Personal Information] address [Personal Information] [Personal Information] BC, since January 2004. [Personal Information] is a partner with [Personal Information] [Personal Information] for [Personal Information]. Date of filing: January 19, 2004.

252. [Personal Information] General Partnership with [Personal Information] No address. Firm# 98-0247316. Date of filing: September 30, 1998.

253. [Personal Information]: Incorporation number #11-0550983. General Partnership with [Personal Information] address shown as [Personal Information] registration date March 2, 2011.
254. [Personal Information] A Sole Proprietorship. Business Number 09-0514861. The business address is [Personal Information] is listed as the Proprietor for [Personal Information] which does electrical and electronics maintenance and service. Date of filing: November 3, 2009. According the mortgage application, [Personal Information] is an "Electronics Technologist" and owns [Personal Information]

[Personal Information] – ANTRIM INVESTMENTS / [Personal Information]

### FINTRAC Information

255. Two cash deposits conducted to an account held by [Personal Information]
256. On August 18, 2011, one cash deposit was conducted by [Personal Information] (listed as the Director of [Personal Information] totalling \$23,200.00 CAD.
257. On January 17, 2012, one cash deposit totalling \$10,000.00 CAD was conducted by [Personal Information]
258. From March 24, 2009 to June 8, 2009, twelve money orders were ordered by [Personal Information] and other unknown individuals, totalling \$11,740.00 CAD payable to Tralee Investments Ltd:
259. On March 24, 2009, at 13:58, 2 money orders serial numbers 5869-287-5063 and 5869-287-5064 with face amounts of \$1,000 totalling \$2,000 were purchased by [Personal Information] at the same location, [Personal Information] in Surrey, BC, payable to Tralee.
260. On March 26, 2009, at 15:03 and 15:04, 2 money orders serial numbers 5869-287-5072 and 5869-287-5073 with face amounts between \$920 and \$1,000 totalling \$1,920 were purchased by [Personal Information] at the same location, [Personal Information] in Surrey, BC payable to Tralee.



261. All of the handwriting on the face of the money orders appeared to be the same. FINTRAC wrote that [Personal Information] appeared to be structuring transactions to avoid the recordkeeping requirements. [Personal Information] purchased just under \$3,000 and [Person] [Personal Information] appeared to be working together based upon the fact that the handwriting on the face of the money orders appear to be the same.
262. On May 5, 2009, at 10:58 and at 16:06 money orders serial numbers 58692875151 to 58692875154 with face amounts between \$900.00 and \$1,000 totalling \$3,900.00 were purchased by unknown person(s) at the same location, [Personal Information] in Surrey, BC payable to Tralee.
263. No purchaser/remitter information was provided on all of the money orders. However, all of the handwriting on the face of the money orders appeared to be the same.
264. On June 6, 2009, at 09:38 and 09:39 money orders serial numbers 58801559236 to 55801559237 with face amounts of \$1,000 totalling \$2000 were purchased by unknown person at the same location, [Personal Information] in Surrey, BC, payable to Tralee Investments Ltd.
265. On June 8, 2009, at 14:28, money orders serial numbers 5880155-9240 and 58801559241 with face amounts between \$920 and \$1000 totalling \$1920 were purchased by unknown person at the same location, [Personal Information], in Surrey, BC, payable to Tralee Investments Ltd.
266. All of the handwriting on the face of the money orders appeared to be the same. Unknown person appeared to be structuring transactions to avoid the recordkeeping requirements. Unknown person purchased just under \$3,000.
267. All of the money orders were deposited in an account held by Tralee Investments Ltd

[Personal Information]

**Second Mortgage -** [Personal Information] BC

268. [Personal Information] was a client of CURTIS.

269. In 2004, [Personal Information] purchased the property at [Personal Information]. She had an existing mortgage through [Personal Information] of 2004 Jun 28 [Personal Information] of 2007 Jun 25 [Personal Information] [Personal Information]
270. In 2010, [Personal Information] applied for a second mortgage for \$50,000 at 10% through DLC Mountain View. The existing mortgage was \$156,000.
271. The referring party for this mortgage was Eathan SKWIRA.
272. The property was valued at \$285,000 by [Personal Information]. The BC Assessment Roll assessed values for 2009 and 2010 are consistent with the appraised value.
273. On July 14, 2010, Antrim Investments arranged for a second mortgage of \$52,500 at 10.49% for one year with Tralee Investments Ltd.
274. On July 7, 2011, Antrim Investments renewed the mortgage between [Personal Information] and Tralee Investments for a further 12 months at 10.49%.
275. On June 27, 2013, the property was sold for \$265,000.
276. On June 27, 2013, [Personal Information] purchased [Personal Information] BC, for \$349,809. [Personal Information] obtained financing through [Personal Information] [Personal Information]
277. Based on [Personal Information] stated income on her mortgage application, FICOM investigators were of the opinion that [Personal Information] could not support her consumer debt payments; and that it is likely that her debts were being paid by a third party.
278. Unusual Aspects of Mortgage Transaction as reported by FICOM:
- 278.1. [Personal Information] stated employment is as a cook with [Personal Information] at \$35,000 salary;
- 278.2. Had over \$103,000 in consumer debt in her name, with annual minimum debt service payments required of approximately \$30,871

plus an existing **Personal Information** mortgage debt service of \$13,727 plus the Antrim second mortgage of \$5,520 = Total annual debt service is \$50,118.

- 278.3. All credit lines were in her name, except one joint account with **Personal Information** for \$55,000 opened 2006 and paid in full 2010.
- 278.4. All credit lines were paid on time according to credit bureau - no apparent delinquencies.
- 278.5. Assets include 2002 Corvette.
- 278.6. Unknown if any co-habitation, however clearly the level of debt and servicing requirements meant a supply beyond her employment or another person was paying these accounts in her name.

### Background/Associates

- 279. **Personal Information** is a possible ex-girlfriend of **Personal Information** (co-debtor on a lien 2006).
- 280. **Personal Information** is associated to Sulaiman SAFI and Eathan SKWIRA. Sulaiman SAFI named **Personal Information** in a 2012 interview with Vancouver Police Department (Vancouver Police File 2011-170962). This investigation involved a money-laundering scheme.

### FINTRAC Information

- 281. On November 2, 2007 and November 5, 2007, **Personal Information** deposited cash totalling \$20,000.00 CAD to a **Personal Information** account. The deposits consisted of amounts of \$5,000.00 CAD or \$2,500.00 CAD at a time.
- 282. On May 30, 2012 **Personal Information** (listed in Hungary) ordered an EFT to the benefit of **Personal Information** totalling \$26,353.16 CAD.

**Personal Information**

### Mortgage application - **Personal Information** BC

- 283. **Personal Information** is a client of Grant CURTIS.

284. A mortgage application was referred to Antrim on or about December 28, 2009, but there is no information to indicate whether the application was granted.

### Background/Associates

285. [Personal Information] referred [Personal Information] to CURTIS.

286. [Personal Information] is a “friend” of CURTIS’ on CURTIS Facebook page.

287. [Personal Information] is an ex-member of the Hell Angels Nomads.

288. [Personal Information] is associated to a property located at [Personal Information] BC. The property was transferred between [Personal Information] and his step-father [Personal Information]. The [Personal Information] family is well-known in the Organized Crime world.

[Personal Information]

### Referral Fee recipient

289. [Personal Information] was a recipient of a referral fee on Dominion Lending Centers payroll documents for client (surname – [Personal Information]) referral was not examined by FICOM.

[Personal Information]

### Mortgage Broker Assistant

290. [Personal Information] was a mortgage broker assistant to Grant CURTIS.

291. A large number of DLC mortgage deals were commission split 50/50 with [Personal Information]. No date of birth or other personal information provided.

292. Employed by Dominion Lending Centres Mountain View (DLC) as a mortgage expert. Contact telephone numbers provided at the website were landline [Personal Information].

Personal Information and cellular Personal Information A photograph on the DLC website shows a blonde female approximately 25-35 years old.

293. "LinkedIn" has a Personal Information (with same photograph as in the DLC Website) as previously Project Manager at Personal Information and Operations Manager at Personal Information Educated at the Saunder School of Business, UBC, and Richmond High.
294. The Personal Information website lists Personal Information with the same information noted above. She works in Maple Ridge, BC.

Personal Information

### Mortgage - Personal Information

295. Personal Information was a client of CURTIS.
296. On January 7, 2010, Personal Information BC was offered for sale at \$539,000.
297. On August 31, 2010, Personal Information BC applied for a mortgage with First National Financial Corp Mortgage to buy Personal Information BC for \$510,000. Personal Information reported her income at \$112,700. She had a down payment from GICs for \$102,000. She was seeking a loan for \$408,000.
298. Grant CURTIS comment on the mortgage application: "self employed as a nail tech and skin care professional she rents a chair from salon and pays a percentage to owner. I have added the noa's together [Notice of Assessments] and grossed up 15% qualified income will send separate e mail for rental home thank you Grant."
299. On September 2, 2010, mortgage summary reported that Personal Information owned property at Personal Information BC from which she received rental income. Land Title documents confirm that Personal Information is the registered owner of Personal Information having purchased the property on September 20, 2004. This is the same address as Personal Information (possibly brother). Personal Information was the previous owner of a vehicle that was registered to

**Personal Information** in 2002. They both share the same surname and DL Keyword (usually mother's maiden name), however CFSEU was unable to confirm if related.

300. On October 27, 2010, **Personal Information** purchased **Personal Information** BC for \$510,000.

301. Possible ex-husband: **Personal Information** According to BC Court Online, a Supreme Family Law Proceeding was filed in January 2001 between **Personal Information** and **Personal Information**

302. Unusual Aspects of Mortgage Transaction as reported by FICOM:

302.1. The mortgage application stated borrower "owns" **Personal Information** Surrey, and resided at that location for the last 3 years; however, the Land Title Office records show the owners of this property as **Personal Information** **Personal Information** since January 2005.

302.2. The T1 Generals have indications they may not be genuine:

302.3. The font for the business location "Pitt Meadows, B.C." appears different and smaller than the font on rest of the forms for both 2008 and 2009;

302.4. The stated business of borrower **Personal Information** on T1 Generals for 2008 (gross sales of \$138,902) and 2009 (gross sales \$136,825) was in the name of **Personal Information** (no unit #). BC Company Registry shows **Personal Information** **Personal Information** registered as a sole proprietorship to a **Personal Information** of Pitt Meadows with a registration date of October 25, 2008, and business start date of January 15, 2009.

302.5. An underwriting condition for approval to verify no taxes owed on the T1 General is abnormal - usually demonstrated by a Notice of Assessment to verify no taxes.

- 302.6. Underwriter's comments indicate borrower is a nail tech who rents a chair at a salon; however, T1 Generals Statement of Business Activities contradicted this by noting her own business is [Personal Information]
- 302.7. Unusual sequence of ownership of [Personal Information] where [Personal Information] owns, then transfers to borrower, then is purported to be a tenant of this property, while she is registered owner and stated resident of [Personal Information] - MVB search does not reveal any other person with this name.

### Background/Associates

303. Possible brother is [Personal Information] was the previous owner of a vehicle that registered to [Personal Information] in 2002. They both share the same surname and Driver's licence Keyword (usually mother's maiden name); however, the CFSEU analyst was unable to confirm if related.

### BC Assessment / Land Titles:

304. [Personal Information] (Businesswomen) is the registered owner of [Personal Information] [Personal Information] This is the same address that [Personal Information] brother.
305. [Personal Information] - Shows on the Land Titles as [Personal Information] (Labourer). This may or may not be the same person.

[Personal Information]

### Second Mortgage - [Personal Information] BC

306. [Personal Information] was a client of Grant CURTIS.
307. On April 25, 2010, [Personal Information] BC applied for a second mortgage through DLC. The subject property was valued at \$550,000 with an existing first mortgage held by [Personal Information] The first mortgage balance was \$365,000 at an interest rate of 2.85%.

308. A note on the mortgage application read: "First morgage [sic] is for 365K ish second [mortgage]" is for 60 K." A second note reads: "Needs 25K more re-fi better?"
309. On April 29, 2010, the property was appraised by [Personal Information] for [Personal Information]. The assessed value was \$478,000.
310. On April 29, 2010, Grant CURTIS emailed [Personal Information] of ANTRIM: "Wants 25000, I put notes on the front page, 10% fee slam dunk I think NAS appraisal from RBC."

### Background/Associates

311. [Personal Information] is/was business partners with [Personal Information]

[Personal Information]

### First Mortgage [Personal Information] BC

312. [Personal Information] as a client of Grant CURTIS.
313. On July 26, 2010, [Personal Information] completed mortgage application with Dominion Lending (DLC).
314. On July 24, 2010, [Personal Information] appraised [Personal Information] Vancouver, on behalf of DLC. The property was valued at \$390,000.
315. On July 25, 2010, an email from [Personal Information] to Grant CURTIS regarding the [Personal Information] Appraisal: "FYI – I didn't put in a Letter of Transmittal."
316. On July 26, 2010, Grant CURTIS emailed [Personal Information]: "5% fee split is what I told him. 60% LTV 234 000. Thanks [Personal Information] more coming. I will get his lawyer info."
317. On July 26, 2010, Antrim Investments Ltd wrote to [Personal Information] to advise that a First Mortgage for \$234,000 at 8.95% for one year had been arranged with a private investor [Antrim Balanced Mortgage Fund].



Personal Information

**First Mortgage -** Personal Information **BC**

318. Personal Information purchased a new house on Personal Information BC from Personal Information for \$1,070,000. Personal Information paid \$802,500 and Personal Information paid \$267,500. Grant CURTIS brokered a mortgage application in which Personal Information and Personal Information borrowed \$761,897.50 from First National Financial. Personal Information and Personal Information apparently rented out the property. Seven months later Personal Information transferred title to Personal Information ex-wife Personal Information for \$1.00 and other good & valuable consideration.
319. On September 20, 2010, a property disclosure statement residential for a bare-land strata lot read: "Home has never been lived in and in under Pacific Home Warranty."
320. On November 23, 2010, an MLS listing shows the list price of Personal Information North Vancouver, at \$1,149,000.
321. On December 25 2010, a contract of purchase and sale between the seller and Personal Information indicated a purchase price of \$1,070,000, a completion date of January 21, 2011, and possession date of January 22, 2011.
322. On January 7, 2011, CURTIS brokered the mortgage application for Personal Information with First National. The Broker (CURTIS) comments read: "...these lifelong friends are going to buy this high-end house in North Vancouver for a rental property investment and already have a renter lined up..."
323. On January 11, 2011, Personal Information (Landlords) entered into a residential Tenancy Agreement with Personal Information (Tenant). The tenancy was to start on February 1, 2011 and end on February 1, 2012.

324. On January 21, 2011, according to LTO CA1877525, Form A and LTO CA1877526, Form A, title was transferred from [Personal Information] to [Personal Information] BC for \$267,500, and, to [Personal Information] (businessman) of [Personal Information] BC for \$802,500.
325. On January 21, 2011, according to LTO CA1877527, Form B Mortgage form, [Personal Information] BC and [Personal Information] BC, borrowed \$761,897.50 from First National Financial.
326. On August 19, 2011, according to LTO CA2152254, Form A - Freehold Transfer, the property was sold for "\$1.00 and other good & valuable consideration." The actual market value of the property was \$1,070,000. Title was transferred from [Personal Information] (self employed) of [Personal Information] BC.
327. The sale of the property to [Personal Information] was unusual:
- 327.1. On September 19, 2006, [Personal Information] Vancouver, BC and [Personal Information] of [Personal Information] Vancouver, BC filed a separation agreement.
- 327.1.1. [Personal Information] owns the W 52nd property.
- 327.2. On September 4, 2009, a letter from [Personal Information] stated she did not hold [Personal Information] responsible for any alimony payments or any other payments regarding their Divorce settlement. As of August 2008, all settlement monies were paid in full.
328. Unusual aspects of the subject property [Personal Information] (North Vancouver, BC) mortgage transaction as noted by FICOM:
- 328.1. Non-Disclosure of other properties owned or previous address since less than 3 years at present.
- 328.2. Tenancy agreements to support rental income for property do not appear to be authentic:

- 328.3. A tenant lined-up before the completion date. Unusual to have pre-arranged tenancy since do not own or have possession of the property yet – normally the appraiser includes what the market rent will be for the purpose of the mortgage application.
- 328.4. Tenancy agreements end on the first day of the same month of the following year, rather than the last day of prior month the following year (1 year + 1 day).
- 328.5. The property was sold/transferred within 8 months to the ex-wife of **Personal Information** is guarantor on new **Personal Information** mortgage.
- 328.6. **Personal Information** ex-wife was a resident of California in 2009. According to a signed affidavit, she no longer had any entitlements under their divorce agreement. In 2011, **Personal Information** ex-wife is on title as the resident of subject property.
- 328.7. **Personal Information** T1 “Statement of Business Activities” showed “code 523000” which refers to financial services excluding banks and finance companies. There is no internet footprint for **Personal Information** except for a bodybuilding photo (if the same person).
- 328.8. **Personal Information** assets reported on the application showed significant cash in business savings account - \$700,000 (down payment is approx. \$308,103).
- 328.9. **Personal Information** was described on a credit bureau report and on a First National application, as an offshore investor; however, the T1 General, line 266, regarding foreign property/income was marked as “no.”
- 328.10. **Personal Information** is the sole director of **Personal Information** **Personal** incorporated on April 7, 2010. As of January 4, 2012, the company was not in good standing for fail to file.
- 328.11. **Personal Information** is the sole-proprietor of **Personal Information** which was registered on February 10, 2000 and is active.

- 328.12. The 2008 and 2009 tax returns show no business expenses claimed, except 2009 has a small amount for professional services. Broker comments on the application about **Personal Information** income did not make sense; that is, his income was lower in 2009 because travelling.
- 328.13. Given large tax amounts due, there was no evidence of installment payments typically required by CRA, except for a note about installment interest due on Notice of Assessments.
- 328.14. The Notice of Assessment for 2009 appeared to have anomalies; that is, misaligned highlight bar at top and the relative contrast on 2009 Notice of Assessment much lighter for highlight bar than on the 2008 Notice of Assessment.
- 328.15. According to the tax returns, **Personal Information** prepared them but a fax header on 2008 Notice of Assessment displayed the name **Personal Information** which are tax lawyers.
- 328.16. Mortgage application shows same residential phone number for **Personal Information**
- 328.17. **Personal Information** shown as "single" but co-owns his own property with a **Personal Information**
- 328.18. Tax year 2009 Notice of Assessment for **Personal Information** has indications of possible cut-and-paste.
- 328.19. Tax year 2008 Notice of Reassessment showed a \$60,000 increase in Line 150 income over previous assessment.
- 328.20. Correspondence from Tax Lawyer **Personal Information** dated May 3, 2010, addressed to **Personal Information** address – only the mortgage application shows Marine Dr. in White Rock as residential address.
- 328.21. Quick closing date.

## Background/Associates

329. [Personal Information] was the owner/operator of [Personal Information] on South East Marine Drive in Vancouver, BC. At the time of Internet queries of [Personal Information] [Personal Information] showed that the company was with [Personal Information] at a new location. There is no reference to [Personal Information] at the business.
330. [Personal Information] were involved in two investigations involving uttering a forged document. Eathan SKWIRA used the identity of two different people to obtain financing for a fictitious boat and trailer.

[Personal Information]

331. [Personal Information] had a company called [Personal Information]
332. [Personal Information] owns a number of properties in 2001 – one property has a mortgage held by [Personal Information] (which is [Personal Information] of Hell Angels Westpoint).

[Personal Information]

## First Mortgage [Personal Information] BC

333. [Personal Information] was a client of Grant CURTIS.
334. On September 21, 2010, [Personal Information] (step-brothers) applied for a mortgage to purchase [Personal Information]. This was a private sale between [Personal Information] and the seller [Personal Information]. The purchase price was \$550,000.
335. [Personal Information] borrowed \$538,958.75 from First National Financial GP Corporation.
336. On October 5, 2010, title was transferred to [Personal Information]
337. While the purchase price was \$550,000, the BC Assessment Roll value for 2010 was \$486,600.

338. According to the mortgage application [Personal Information] provided a down payment of \$27,000 from the sale of a boat. However, a bill of sale indicated that it was [Personal Information] who sold a boat and trailer for \$40,000.
339. According to the mortgage application both [Personal Information] owed rental property:
- 339.1. [Personal Information] Burnaby, BC. A rental agreement, dated September 28, 2010, indicated [Personal Information] rented the Hasting St property to a [Personal Information] beginning on November 1, 2010 for one year on a month-to-month basis.
- 339.2. [Personal Information] (possibly [Personal Information] wife) purchased [Personal Information] Surrey, BC on December 13, 2007 for \$163,000.
- 339.3. [Personal Information] owned [Personal Information] Surrey, BC. [Personal Information] holds 1/100 interest the property at [Personal Information] Surrey, BC. [Personal Information] holds 99/100 interest. The property was purchased on November 19, 2009 for \$166,000.
- 339.4. [Personal Information] also owns [Personal Information] Surrey, BC, which he purchased on September 29, 2009.
340. According to FICOM, the unusual aspects of the mortgage transaction:
- 340.1. Quick close – application dated September 21, 2010 and close date October 5, 2010.
- 340.2. It was a private sale.
- 340.3. Two step-brother's buying to move in together / rent-out existing apartments is unusual.
- 340.4. Another client with a "boat" named as an asset.

- 340.5. Sale of boat for down-payment. The “bill of sale” appeared questionable. FICOM checked for a boat trailer VIN with ICBC but none was found.
- 340.6. Notice of Assessment’s had indications they may not be genuine – alignment issues, incorrect form numbers and addition errors.
- 340.7. Tenancy agreements appear questionable – all written similar to other CURTIS deals where term is a year plus day, for example, March 1, 2010 to March 1, 2010. Normally a one-year lease ends on the last day of the prior month.
- 340.8. [Personal Information] is a self-employed painter with a stated income of \$74,634.
- 340.9. [Personal Information] has a previous mailing address of [Personal Information] Avenue, Coquitlam, which was the same UPS Store address as was used by [Personal Information] from 2003 to 2007.

### Background/Associates

341. The subject property - [Personal Information] Burnaby, BC - was the residence of the mother of [Personal Information]
342. [Personal Information] is an associate of [Personal Information]
343. [Personal Information] is associated to [Personal Information] as boyfriend/girlfriend. They have a child together.
344. [Personal Information] is associated to various criminal figures and members of the Hells Angels. On October 7, 2010, [Personal Information] was the registered owner of a vehicle that was present at a funeral of a full patch member of the hells angels ‘Gonzales’. During the service various full patch hells angels’ members and associates were present (Re: File 5000:2010-9543).
345. [Personal Information] has numerous adverse dealings with the police. [Personal Information] carded as violent and known for street level violent crimes as well as property crimes and drug-related offences.

346. Address of interest - [Personal Information] purchased [Personal Information] Surrey, BC from [Personal Information] in December 2008.
347. Personal Property Registry: 2012 June - 4 year security agreement registered by TD Auto Finance Inc. against [Personal Information] (believed to be [Personal Information] spouse)
348. [Personal Information] appears to be an avid hockey and ball hockey player. [Personal Information] was the head coach/team Rep for the 6th annual Canuck Place Charity Hockey Tournament.
349. [Personal Information] received a "stay of proceeding" for uttering threats and a Section 810 Peace Bond in regards to a complaint of criminal harassment.

### Associated Companies

350. [Personal Information] Firm #10-0518875. [Personal Information] Sole Proprietor. Declaration date: January 6, 2010.
351. [Personal Information] Firm #98-0234966. Partners: [Personal Information] and [Personal Information]. Declaration date: February 25, 1998.
352. [Personal Information] Painting, Firm # 02-0332312. Partners: [Personal Information] and [Personal Information]. Declaration Date: 2002-10-03.

[Personal Information]

### Business Partner to Grant CURTIS

353. [Personal Information] was Grant CURTIS' business partner in [Personal Information].
354. [Personal Information] was also a co-covenator on a 2008 mortgage for a property owned by Grant CURTIS; that is, [Personal Information] BC. [Personal Information] also previously co-owned [Personal Information] BC, with CURTIS.



Personal Information

#C-0973334:

355. The business was originally incorporated on January 7, 2013 in Alberta as Personal Information. The business continued into BC on June 21, 2013. Grant CURTIS and Personal Information were named as the directors.
356. Personal Information was licensed with the Township of Langley. The address on the business licence was Personal Information telephone Personal Information. Personal Information

## Properties

357. Personal Information
- 357.1. Owner: Grant Brian CURTIS (Self Employed) of the Personal Information Surrey, BC.
- 357.2. On January 11, 2008, the title was changed removing Personal Information (aka Personal Information and showing Grant Brian CURTIS (Self Employed) and Personal Information (Businessman) as Tenants in Common, both of Personal Information BC, for "\$1.00 and other good and valuable considerations," and declared value of \$285,000
- 357.3. On October 15, 2009, the title changed removing Personal Information. Personal Information
- 357.4. 2013 Assessed value: \$556,000.
358. Personal Information
- 358.1. Owner(s): Personal Information (Psychiatric Nurse) and Personal Information (Medical Sales Representative) of the same address.
- 358.2. Purchased on September 15, 2004 for \$348,544.
- 358.3. 2013 Assessed value: \$564,000.

**First Mortgage -** Personal Information **BC.**

359. Personal Information was a client of Grant CURTIS.
360. On September 7, 2010 Personal Information applied for a mortgage with First National Financial to purchase Personal Information BC for \$560,000. The mortgage was \$520,000.
361. Personal Information son, Personal Information gave her a gift of \$40,000.00. However, the actual down payment was only \$28,000.00.

[Note: Similar dollar amounts to the boat sale proceeds used for the Personal Information transaction. Personal Information provided a down payment of \$27,000 from the sale of a boat; while the bill of sale indicated Personal Information sold a boat and trailer for \$40,000.]

362. According to the mortgage application, Personal Information was to move in with Personal Information but was not a joint application.
363. Grant CURTIS commented on the DLC mortgage application: Personal Information is a successful self-employed property manager service works with several properties, qualified income grossed up 15% good credit, buying house to live in and is buying with her son, but he has no credit, so he is gifting the DP. They have their house rented out for 2000 per month and we will send you a separate email with details. Thank you Grant and Personal Information
364. On November 1, 2010, the Personal Information became the registered owners of Personal Information
365. On November 1, 2010 Personal Information rented the property for \$2,000 per month.
366. On April 28, 2011 Personal Information sold the property for \$475,000.
367. Unusual Aspects of Mortgage Transaction as reported by FICOM:
- 367.1. Borrower a property manager (no record of being licensed with Real Estate Council).

- 367.2. Self-employed for "3 yrs." FICOM found it was typical of CURTIS' applicants to state "3 yrs" for the duration of employment. Lenders usually require an employment history if less than 3 years at current.
- 367.3. Gift of \$40,000 from son per gift letter seems unusual for a son of a 45 year old.
- 367.4. Actual down payment appears to be only \$28,000.
- 367.5. Broker notes on application tell story of son moving in with the borrower but not joining the application as a co-borrower due to having no credit – story questionable.
- 367.6. [Personal Information] was/is registered owner of another property at [Personal Information] since Dec 2009 and [Personal Information] is the mortgagor on a [Personal Information] mortgage since 2009-12-22 and subsequent Xceed mortgage August 31, 2010. (Note: these lenders do sub-prime).
- 367.7. There was no apparent internet footprint for an [Personal Information] in BC or anything in relation to property management.
- 367.8. Credit bureau shows [Personal Information] for employer (note there is a [Personal Information] in BC) BC Reg shows [Personal Information] was amalgamated in 1979.
- 367.9. Appears in December of 2006 [Personal Information] were "bldg managers" at [Personal Information] Vancouver, as noted on the Form A (registered title transfer document) when [Personal Information] Hwy, Port Coquitlam was purchased (likely resident caretakers of building).
- 367.10. Income of \$119,456 seems unreasonable on application for property management.
- 367.11. Address on a purported [Personal Information] Statement and credit bureau (reported Nov 2009) for [Personal Information] shows Suite [Personal Information]

Port Moody. The registered owner of [Personal Information] is [Personal Information] and [Personal Information] appeared to be a commercial strata unit in Newport Village leased to a UPS Store - (mailboxes).

367.12. Another address for [Personal Information] on credit bureau is [Personal Information] Como Lake Rd, Coquitlam, which appeared to be another UPS store.

367.13. The application stated the borrower was married, but no information provided about her spouse and, apparently, the underwriter did not question this.

367.14. Notice of Assessment's had indications they may not be genuine - missing verification numbers, misalignment of layout, etc.

### Background/Associates

368. [Personal Information] own another property. On December 14, 2006, the [Personal Information] purchased [Personal Information] Port Coquitlam, as joint tenants, for \$445,000.

369. On October 24, 2013, First National Financial GP Corporation filed a lawsuit against [Personal Information] to foreclose in Vancouver Supreme Court

370. [Personal Information] is a self-employed property manager.

371. [Personal Information] son, [Personal Information] is known to police. [Personal Information] was the registered owner of [Personal Information] Mission, BC and was living in the residence along with his spouse and a child where police investigation uncovered a large marijuana grow operation that consisted of over a 1000 marijuana plants

371.1. On March 4, 2011, [Personal Information] was arrested by Mission RCMP (Re:2011-2448) on charges of theft of hydro under the Criminal Code as well as drug related charges of possession and trafficking of a controlled substance under the CDSA. [Personal Information] was subsequently convicted under Section 7 of the CDSA on possession of a controlled substance; the substance being Cannabis Marijuana.

372. Based on information received from FICOM investigation, [Personal Information] is associated to Sulaiman SAFI, Eathan SKWIRA and Grant CURTIS. FICOM investigated [Personal Information] in regards to a complaint filed with Nanaimo RCMP. [Personal Information] falsely represented himself as a registered mortgage. According to Nanaimo RCMP File 2011-2456 and the subsequent FICOM investigation:

373. The complaint [Personal Information] sought financing to purchase [Personal Information] Nanaimo. [Personal Information] was unable to obtain sufficient financing. The seller of the property, [Personal Information] referred [Personal Information] to [Personal Information] represented himself as a mortgage broker.

374. [Personal Information] referred [Personal Information] mortgage to [Personal Information] a registered sub-mortgage broker with [Personal Information] who obtained financing from [Personal Information] old FICOM investigators:

374.1. His business partner was [Personal Information]

374.2. [Personal Information] friend (unknown) who worked at a [Personal Information] introduced him to [Personal Information]

374.3. [Personal Information] referred him a number of mortgage applications including an application from [Personal Information]

374.3.1. Recall, Grant CURTIS submitted an application for [Personal Information] to ANTRIM on April 15, 2011 and the name [Personal Information] appeared in reference to another mortgage on the DLC payroll documents for CURTIS.

374.4. [Personal Information] believed that [Personal Information] co-brokered [Personal Information] mortgage application with a "Sully SAFI" (Suliamen SAFI)

375. SAFI is not a registered sub-mortgage broker but appeared to be the controlling mind behind [Personal Information] a purported lending business, which was not registered.

376. FICOM investigators received an email from [Personal Information] with a copy of [Personal Information] mortgage application that was on CURTIS' DLC letterhead.

377. [Personal Information] told FICOM investigators that [Personal Information] mortgage application came from [Personal Information] and that he never dealt nor had ever met Grant CURTIS.

378. A FICOM Investigator met with Grant CURTIS about [Personal Information] CURTIS stated:

378.1. He once worked out of the same office as Sulaiman SAFI and [Personal Information] [Personal Information]

378.2. He never met [Personal Information] nor had he ever heard of him.

378.3. [Personal Information] was a former client. [Personal Information] had sought his assistance to help her obtain a second mortgage, however he was unable to help her obtain financing.

379. Pursuant to section 8(1.4)(a) and 8(2) of the *Mortgage Brokers Act*, [Personal Information] was ordered to cease and desist engaging in unregistered mortgage broker activity in the Province of British Columbia, effective immediately, unless and until he registered to do so under the Provisions of the Act.

[Personal Information]

### First Mortgage - [Personal Information] Salmon Arm, BC

380. [Personal Information] was a client of Grant CURTIS. [Personal Information] was referred to CURTIS from [Personal Information]

381. First National mortgage application, dated August 26, 2010. The completion date was September 20, 2010.

382. [Personal Information] provided an address of [Personal Information], for the last three years. This is a commercial property.

[Of note, [Personal Information] is also associated to this address on an [Personal Information] credit report. Refer to the section on [Personal Information] for details.]

383. [Personal Information] claimed to be a self-employed courier for the past 5 years with an income of \$63,250.
384. A down payment of \$65,000 came from the sale of his sister's [Personal Information] house [Personal Information] Surrey, which was previous owned by [Personal Information] and subsequently transferred to TA.
385. Unusual Aspects of Mortgage Transaction as reported by FICOM:
- 385.1. [Personal Information] purported residential address and source of down-payment from a sale is actually a commercial retail/office space, and is also the same address appearing on the [Personal Information] for [Personal Information]
- 385.2. Numerous addresses associated to [Personal Information] on the Motor Vehicle Branch database appear to be mail boxes.
- 385.3. Claims to be a self-employed courier but FICOM could not find an internet footprint for [Personal Information] or any apparently related courier business.
- 385.4. The down payment of \$65,000 supposedly came from proceeds of the sale of a property at [Personal Information]
- 385.4.1. On December 2, 2008, [Personal Information] purchased [Personal Information] Ave, Surrey, for \$570,000.
- 385.4.2. On April 9, 2010, [Personal Information] sold [Personal Information] \$1 to [Personal Information] (purported sister of [Personal Information]) The market value of the property was \$602,000.
- 385.4.3. On July 19, 2010, [Personal Information] sold the property. A Gift Letter stated [Personal Information] gifted the entire equity from the sale of [Personal Information] Surrey, \$260,739.73, to [Personal Information]
- 385.5. The address on Gift Letter for [Personal Information] [Personal Information] Surrey, which is a business address for [Personal Information]

(CGA firm) and located in same commercial complex as [Personal Information] purported residential address.

385.6. A [Personal Information] "Customer Snapshot" for [Personal Information] showed a cash balance for a \$236,338.43 and listed his address as [Personal Information] [Personal Information] Surrey" (same as address for [Personal Information] on gift letter).

385.7. The purported "direction to pay" document to direct \$260,739 to borrower, to be used as down payment, by [Personal Information] (purported sister) is not signed, and it appears to look like a statement of adjustments, but renamed "direction to pay", and includes items for which no direction to pay seems to be required [Personal Information] and outstanding City Taxes)

[Personal Information]

[Personal Information]

**Langley, BC**

386. [Personal Information] was a client of Grant CURTIS.

387. On October 27, 2009, [Personal Information] purchased [Personal Information] Langley.

388. On November 24, 2009, [Personal Information] applied for a mortgage with DLC. Grant CURTIS was the agent. [Personal Information] provided a residential address of [Personal Information] [Personal Information] Surrey, BC. According to the mortgage application, [Personal Information] owned the property on 83 Avenue for 5 years but it was not her principal residence. [Personal Information] named her current employer as the [Personal Information]

389. On November 24, 2009, a mortgage was arranged with [Personal Information] [Personal Information] for a 5-year loan for \$595,500 plus the cost of insurance – total loan was \$563,078.25. The down payment for the property was furnished by [Personal Information] [Personal Information] father, [Personal Information] via a gift letter. According to the gift letter, [Personal Information] provided an undisclosed amount to her daughter.



390. On December 1, 2009, [Personal Information] entered a rental agreement with [Personal Information] (tenant). The tenancy began on December 15, 2009 and ended on December 14, 2011.

391. The BC Assessment roll value for the property in 2009 was \$433,000.

392. On December 29, 2009, title was transferred to [Personal Information]

393. On March 13, 2012, [Personal Information] sold the property to [Personal Information] for \$649,000. The BC Assessment roll for 2012, valued the property at \$446,000.

[Personal Information] was a client of [Personal Information] SAFI [Personal Information]

[Personal Information]

### Referral Fee Recipient

394. [Personal Information] was the recipient of a referral fee on Dominion Lending Centres payroll documents.

395. [Personal Information] appears in PRIME files as the subject of complaint for threats against persons; largely, these incidents related to domestic situations. One incident involved a video store clerk who was threatened by [Personal Information]. Apparently [Personal Information] took exception to a comment made by the clerk about [Personal Information] surname.

396. [Personal Information] has no criminal record.

[Personal Information]

### First Mortgage [Personal Information] North Vancouver, BC

397. [Personal Information] purchased a new house on [Personal Information] North Vancouver, BC from [Personal Information] for \$1,070,000. [Personal Information] paid \$802,500 and [Personal Information] paid \$267,500. Grant CURTIS brokered a mortgage application in which [Personal Information] and [Personal Information] borrowed \$761,897.50 from First National Financial.

Personal Information apparently rented out the property. Seven months later, Personal Information transferred title to Personal Information ex-wife Personal Information for \$1.00 and other good & valuable consideration.

- 397.1. On September 20, 2010, a property disclosure statement residential for a bare-land strata lot read: "Home has never been lived in and in under Personal Information"
- 397.2. On November 23, 2010, an MLS listing shows the list price of Personal Information North Vancouver, at \$1,149,000.
- 397.3. On December 25 2010, a contract of purchase and sale between the seller and Personal Information indicated a purchase price of \$1,070,000, a completion date of January 21, 2011, and possession date of January 22, 2011.
- 397.4. On January 7, 2011, CURTIS brokered the mortgage application for Personal Information with First National. The Broker (CURTIS) comments read: "...these lifelong friends are going to buy this high-end house in North Vancouver for a rental property investment and already have a renter lined up..."
- 397.5. On January 11, 2011, Personal Information (Landlords) entered into a residential Tenancy Agreement with Personal Information (Tenant). The tenancy was to start on February 1, 2011 and end on February 1, 2012.
- 397.6. On January 21, 2011, according to LTO CA1877525, Form A and LTO CA1877526, Form A, title was transferred to Personal Information of Personal Information Surrey, BC for \$267,500, and, to Personal Information (businessman) of Personal Information BC for \$802,500.
- 397.7. On January 21, 2011, according to LTO CA1877527, Form B Mortgage form, Personal Information Surrey, BC and Personal Information Surrey, BC, borrowed \$761,897.50 from First National Financial.

- 397.8. On August 19, 2011, according to LTO CA2152254, Form A - Freehold Transfer, the property was sold for “\$1.00 and other good & valuable consideration.” The actual market value of the property was \$1,070,000. Title was transferred from [Personal Information] and [Personal Information] (self-employed) of [Personal Information], North Vancouver, BC.
398. The sale of the property to [Personal Information] was unusual:
- 398.1. On September 19, 2006, [Personal Information] Vancouver, BC and [Personal Information] Vancouver, BC filed a separation agreement.
- 398.1.1. [Personal Information] owns the W 52nd property.
- 398.2. On September 4, 2009, a letter from [Personal Information] stated she did not hold [Personal Information] responsible for any alimony payments or any other payments regarding their Divorce settlement. As of August 2008, all settlement monies were paid in full.
399. Unusual aspects of the subject property [Personal Information] (North Vancouver, BC) mortgage transaction as noted by FICOM:
- 399.1. Non-Disclosure of other properties owned or previous address since less than 3 years at present.
- 399.2. Tenancy agreements to support rental income for property do not appear to be authentic:
- 399.3. A tenant lined-up before the completion date. Unusual to have pre-arranged tenancy since do not own or have possession of the property yet – normally the appraiser includes what the market rent will be for the purpose of the mortgage application.
- 399.4. Tenancy agreements end on the first day of the same month of the following year, rather than the last day of prior month the following year (1 year + 1 day).

- 399.5. The property was sold/transferred within 8 months to the ex-wife of **Personal Information** is guarantor on new **Personal Information** mortgage.
- 399.6. **Personal Information** ex-wife was a resident of California in 2009. According to a signed affidavit, she no longer had any entitlements under their divorce agreement. In 2011, **Personal Information** ex-wife is on title as the resident of subject property.
- 399.7. **Personal Information** T1 "Statement of Business Activities" showed "code 523000" which refers to financial services excluding banks and finance companies. There is no internet footprint for **Personal Information** except for a bodybuilding photo (if the same person).
- 399.8. **Personal Information** assets reported on the application showed significant cash in business savings account - \$700,000 (down payment is approx. \$308,103).
- 399.9. **Personal Information** was described on a credit bureau report and on a First National application, as an offshore investor; however, the T1 General, line 266, regarding foreign property/income was marked as "no."
- 399.10. **Personal Information** is the sole director of **Personal Information** **Personal Information** incorporated on April 7, 2010. As of January 4, 2012, the company was not in good standing for fail to file.
- 399.11. **Personal Information** is the sole-proprietor of **Personal Information** which was registered on February 10, 2000 and is active.
- 399.12. The 2008 and 2009 tax returns show no business expenses claimed, except 2009 has a small amount for professional services. Broker comments on the application about **Personal Information** income did not make sense; that is, his income was lower in 2009 because travelling.
- 399.13. Given large tax amounts due, there was no evidence of installment payments typically required by CRA, except for a note about installment interest due on Notice of Assessments.

- 399.14. The Notice of Assessment for 2009 appeared to have anomalies; that is, misaligned highlight bar at top and the relative contrast on 2009 Notice of Assessment much lighter for highlight bar than on the 2008 Notice of Assessment.
- 399.15. According to the tax returns, [Personal Information] prepared them but a fax header on 2008 Notice of Assessment displayed the name "Thorsteinssons", which are tax lawyers.
- 399.16. Mortgage application shows same residential phone number for [Personal Information] and [Personal Information]
- 399.17. [Personal Information] shown as "single" but co-owns his own property with a [Personal Information]
- 399.18. Tax year 2009 Notice of Assessment for [Personal Information] has indications of possible cut-and-paste.
- 399.19. Tax year 2008 Notice of Reassessment showed a \$60,000 increase in Line 150 income over previous assessment.
- 399.20. Correspondence from Tax Lawyer Thorsteinssons, dated May 3, 2010, addressed to [Personal Information] at Elgin St., address – only the mortgage application shows Marine Dr. in White Rock as residential address.
- 399.21. Quick closing date.

[Personal Information]

400. On December 8, 2010, [Personal Information] purchased [Personal Information] Surrey, BC for \$1,145,647.32. Eight months later, on July 8, 2011, he sold this property for \$2,560,000:

400.1. On November 16, 2010, [Personal Information] appraised [Personal Information] Surrey, BC, at the request of [Personal Information] of [Personal Information] (DLC) for [Personal Information]. [Personal Information] was the

borrower. The property was appraised at Market value \$2,540,000 including net HST.

- 400.2. According to Form B Mortgage LTO CA1833099, on December 6, 2010, [Personal Information] (possibly common-law spouse) of [Personal Information] Surrey, BC, borrowed \$1,540,000 from the [Personal Information].
- 400.3. According to LTO CA1833096 Form A - Freehold transfer, on December 8, 2010, the property was sold to [Personal Information] for \$1,145,647.32.
- 400.4. On March 4, 2011, [Personal Information] received an Order to Pay [Personal Information] a balance of \$108,551.10.
- 400.5. According to LTO CA1944540 Form B – Mortgage, on March 23, 2011, [Personal Information] borrowed \$115,000 from [Personal Information].
- 400.6. On March 24, 2011, an email from Grant CURTIS to [Personal Information] read: "This was supposed to net him \$115,000, any simple way to get him the extra \$6,500??"
- 400.7. According to LTO Form A CA2091372, on July 8, 2011, the property was sold for \$2,560,000.

[Personal Information]

#### **West Vancouver, BC**

401. On September 25, 2009, [Personal Information] (possibly common-law spouse) bought [Personal Information] in West Vancouver for \$2,190,000, in a 70/30 split. CURTIS brokered the mortgage. The down payment was \$700,000 and a mortgage of \$1,490,000. On January 21, 2010, [Personal Information] obtained a second mortgage of \$105,000 from Antrim Balanced Mortgage Fund. On October 29, 2010, [Personal Information] sold the property for \$1,950,000.
- 401.1. On September 28, 2009, an appraisal by [Personal Information] for DLC Mountain View valued the property at \$2,250,000.

- 401.1.1. The Cover page showed the date as September 18, 2009 while the letter on page 2 read April 4, 2008 suggesting that the document was cut and pasted.
- 401.2. On September 25, 2009, LTO Title CA1284357. Registered owner [Personal Information] (businessman) of [Personal Information] West Vancouver, BC.
- 401.3. On September 25, 2009, LTO document CA1284357 (Form A Freehold transfer), An undivided 70/100 interest was transferred to [Personal Information] (businessman) of [Personal Information] West Vancouver, BC. The market value was \$1,533,000.
- 401.4. On September 25, 2009, LTO CA1284358. Form A - Freehold transfer. As to an undivided 30/100 interest. Re-amended. Market value - \$657,000. Transferred from [Personal Information] to [Personal Information] (legal assistant) of [Personal Information] Burnaby, BC.
- 401.5. September 25, 2009, LTO title CA1284358. Registered owner [Personal Information] (legal assistant) of [Personal Information], Burnaby, BC as to an undivided 30/100 interest, [Personal Information] of [Personal Information] West Vancouver, BC as to an undivided 70/100 interest.
- 401.6. September 25, 2009, LTO CA1284679. Form B - Mortgage. Lender - [Personal Information] Borrowers - [Personal Information] Loan principal - \$1,533,000.
- 401.7. On January 7, 2010, DLC Mortgage Application. Applicant - [Personal Information] West Vancouver, BC. (Own - resided for 3 months) Note reads: "He lived at home for years as his father died and he takes care of his mother." Down payment - \$700,000. Purchase Price - \$2,190,000. Mortgage - \$1,490,000.
- 401.8. It appears that at this time [Personal Information] resided at [Personal Information] St, Vancouver, BC, which belonged to [Personal Information] All of the businesses in [Personal Information] name use the [Personal Information] address.

401.9. On January 21, 2010, LTO CA1430098. Form B - Mortgage. Lender - Antrim Balanced Mortgage Fund (2nd mortgage). Borrowers - **Personal Information** Principal - \$105,000.

401.10. October 29, 2010, LTO CA1787105. Form A - Freehold Transfer. Market value - \$1,950,000. Transferred from **Personal Information** and **Personal Information** to **Personal Information** (Physician) of **Personal Information** West Vancouver, BC.

402. According to the lender, First National, these same clients later submitted under their "stated income" program and the application was declined (different underwriter) due to income not being consistent.

### Background/Associates

403. **Personal Information** has associations/affiliations with members of the Independent Soldiers, Hells Angels, UN Gang and the Red Scorpions.

404. **Personal Information** is associated to **Personal Information** (Hells Angels Kelowna) through vehicles only.

405. **Personal Information** is associated to **Personal Information**. **Personal Information** is also linked to **Personal Information**.

**Personal Information**

### First Mortgage - **Personal Information** Burnaby, BC

406. **Personal Information** was a client of Grant CURTIS.

407. On September 21, 2010, **Personal Information** (step-brothers) applied for a mortgage to purchase **Personal Information** Burnaby, BC. This was a private sale between **Personal Information** and the seller **Personal Information**. The purchase price was \$550,000.



408. [Personal Information] borrowed \$538,958.75 from First National Financial GP Corporation.
409. On October 5, 2010, title was transferred to [Personal Information]. The purchase price was \$550,000. The BC Assessment Roll value for 2010 was \$486,600.
410. According to the mortgage application [Personal Information] provided a down payment of \$27,000 from the sale of a boat. However, a bill of sale indicated that it was, in fact, [Personal Information] who sold a boat and trailer for \$40,000.
411. According to the mortgage application, both [Personal Information] owed other properties.
412. The subject property - [Personal Information] Burnaby, BC - was the residence of the mother of [Personal Information].
- 412.1. [Personal Information] is an associate of [Personal Information].
- 412.2. [Personal Information] is linked to [Personal Information] as boyfriend/girlfriend and that they have a child together.
413. Unusual aspects of the mortgage transaction noted by the FICOM investigators:
- 413.1. Quick close – application dated September 21, 2010 and close date October 5, 2010.
- 413.2. Private sale.
- 413.3. Another client with a “boat” in assets.
- 413.4. Two step-brother’s buying to move in together / rent-out existing apartments is unusual.
- 413.5. Sale of boat for down-payment – the “bill of sale” appeared questionable. A query of a boat trailer VIN with ICBC was not found by FICOM investigator.

- 413.6. Notice of Assessment's have indications they may not be genuine – alignment issues, incorrect form numbers and addition errors.
- 413.7. Tenancy agreements appear questionable – all written similar to other CURTIS deals where term is a year plus day, for example, March 1, 2010 to March 1, 2010. Normally one year lease ends last day of the prior month.
- 413.8. According to the DLC mortgage application, [Personal Information] was a welder and had been working for [Personal Information] for 9 years. His stated income was \$43,180.
- 413.9. Since September 2009, [Personal Information] has been the registered owner of [Personal Information], Surrey, but this was not disclosed on the mortgage application. The property showed up as a property being rented on First National's Mortgage Summary.

[Personal Information]

### Referral Fee Recipient

414. According to the FICOM report, an individual by the name [Personal Information] was noted as a recipient of a referral fee on the DLC payroll documents for a client by the surname [Personal Information]. No other information was provided.

### Background/Associates

415. Checks suggest this individual could be [Personal Information] also known as [Personal Information].
416. [Personal Information] has no criminal history, but he has been associated to the Hells Angels on police databases.
417. A Langley PRIME file shows him a property representative of a medicinal marijuana grow-op.
418. [Personal Information] is employed as an ATV salesman with [Personal Information]. [Personal Information]

419. [Personal Information] is a hunter and has one firearm registered.

[Personal Information]

### Referral Fee Recipient

420. [Personal Information] believed to be [Personal Information] was a recipient of a 50/50 commission split that appeared on Dominion Lending Centres payroll documents for a client by the surname [Personal Information]

421. [Personal Information] is a mortgage specialist with Dominion Lending Centres. The DLC website provides a photograph of [Personal Information]. According to the LinkedIn website, [Personal Information] is the vice-president of Business Development at [Personal Information] a mortgage broker at [Personal Information]. He was educated at BCIT and at the Saunder School of Business.

### Civil Proceedings

422. [Personal Information] v. [Personal Information]. A foreclosure filed in Vancouver BC Supreme court, file number 090446.

423. [Personal Information] v. [Personal Information]. A foreclosure filed in Vancouver BC Supreme court, file number 090846.

### Criminal History

#### Marijuana Grow-op - Chilliwack RCMP File 2008-1415

424. On January 14, 2008, Chilliwack RCMP received a complaint of a possible drug house located at [Personal Information]

425. [Personal Information] as the registered owner.

426. A vehicle registered to [Personal Information] was observed at the house.

## Marihuana Grow-up - Chilliwack RCMP File 2012-26242

427. On August 29, 2012, [Personal Information] carded as the property representative in an investigation of a possible grow-op.
428. Health Canada confirmed that a medicinal marihuana licence existed for the property. The licence was issued on October 17, 2012 and expired October 17, 2013.
429. The licence producer/holder was [Personal Information]
430. Of note, a vehicle registered to [Personal Information] was parked in the driveway. [Personal Information] was previously associated to [Personal Information] in 2008 (see Chilliwack File 2008-1415).

[Personal Information]

## Second Mortgage - [Personal Information] Maple Ridge, BC

431. [Personal Information] was a client of Grant CURTIS.
432. Eathan SKWIRA referred [Personal Information] to Grant CURTIS.
433. On June 2, 1997, [Personal Information] (foreman) was the registered owner in fee simple for [Personal Information] Maple Ridge, BC.
434. On August 6, 2008, [Personal Information] (self-employed) became the registered owner in fee simple for a property located at [Personal Information] Maple Ridge, BC. (The adjacent property to [Personal Information].)
435. As of January 8, 2010, [Personal Information] had an existing mortgage with [Personal Information] [Personal Information] BC. The closing principal balance was \$499,407.64.
436. On July 12, 2010, [Personal Information] completed a DLC Mortgage application.

437. A Disclosure Statement, dated July 29, 2010, showed the lender as Antrim Balanced Mortgage Fund Ltd. The mortgage amount was \$615,000.
438. On June 13, 2011, [Personal Information] appraised [Personal Information] Maple Ridge, BC at a market value of \$900,000. However, the report stated that a physical, inspection of the site, improvements and photographs actually took place on February 23, 2010. The timing of the physical inspection would be consistent with the [Personal Information] application.
439. On June 20, 2011, Grant CURTIS emailed [Personal Information] of Antrim Investments regarding [Personal Information] "What is the most we can lend on this property son selling to mom?"
440. On July 12, 2011, [Personal Information] completed a DLC Mortgage application with Grant CURTIS.
- 440.1. Recall, SKWIRA received a referral fee from DLC (via CURTIS) for the [Personal Information] mortgage.
441. On July 14, 2011, Antrim Investments sent a letter to [Personal Information] confirming the terms of a first mortgage for \$615,000 at 8.49% interest for one year.
442. On July 15, 2011, [Personal Information] sued [Personal Information] in Supreme Foreclosure in the Vancouver Law Courts
443. On July 26, 2011, a cover letter from [Personal Information] of Antrim Investments to [Personal Information] (Antrim's lawyer) with attached mortgage instructions. The letter indicated that Antrim was aware that there was an existing mortgage in foreclosure and that [Personal Information] owed CRA \$70,000.00, which would be covered by a private second mortgage. Mortgage amount \$615,000.00.
444. On July 29, 2011, a disclosure statement showed the lender as Antrim Balanced Mortgage Fund Ltd. The mortgage amount was \$615,000.
445. On August 4, 2011, the Property Tax Information sheet from the District of Maple Ridge assessed the land at \$647,000.00.

446. On August 16, 2011, a letter from [Personal Information] stated Antrim would not advance additional funds beyond \$585,000.00 on its mortgage registered for \$615,000, other than any future protective disbursements such as unpaid property taxes etc.
447. On November 25, 2011, there was a series of emails among Grant CURTIS, [Personal Information] (Antrim). CURTIS asked [Personal Information] what would be the most they (Antrim) could lend on this property. According to CURTIS, [Personal Information] was selling the property to his mother [Personal Information].
448. Unusual aspects of the mortgage transaction as identified by FICOM:
- 448.1. A second mortgage/ registered lender [Personal Information] of \$335,000 shows on title.
- 448.2. Coincidentally, the alias [Personal Information] was used in a fraud involving Eathan SKWIRA.
- 448.3. Payments by post-dated cheque written on a [Personal Information] [Personal Information] account in the name of [Personal Information].”
- 448.4. Property is a large acreage in east Maple Ridge – borrower owns the adjacent property.

## Background/Associates

449. [Personal Information] is an “Associate” of the Hells Angels Haney Chapter.
450. [Personal Information] arrived at Ridge Meadows Hospital with a gunshot wound File #2009-13980 (BC20028). The injury was an enter-and-exit injury that did not require surgery. [Personal Information] was very cooperative but was not willing to provide the name of who shot him.
451. [Personal Information] has a history of carrying restricted firearms and prohibited weapons. He has been charged with trafficking marihuana. [Personal Information] has an indefinite condition not to possess any prohibited firearm, restricted firearm, prohibited weapon, prohibited device, or prohibited ammunition for life.

452. [Personal Information] claimed he was "self-employed" on his Land Title documentation. However, he is not an Officer/Director or proprietor of a BC Registered Company or Firm. [Personal Information] is the owner of two properties which are both on [Personal Information] BC; one of them was originally purchased by his parents.

### FINTRAC Information

453. On June 10, 2010, [Personal Information] attempted a mortgage transaction.

453.1. The reporting entity stated, "This was an attempted transaction in regards to a mortgage application for an equity take out on a residential property." The attempted transaction was for \$690,144.00 CAD.

453.2. [R5 - PII] [R5 - PII] "The Notice of Assessment that was submitted with the mortgage documentation to verify income was inconsistent with those issued by Canada Revenue Agency. It was evident this Assessment had been manipulated prior to submission. Many inconsistencies were denoted including mathematical errors."

453.3. This was one month before the Antrim mortgage application.

454. On August 11, 2011, [Personal Information] made three cash deposits to an account totalling \$11,400.00 CAD. This account was held jointly with [Personal Information]

[Personal Information]

### Second Mortgage - [Personal Information] Pitt Meadows, BC

455. On February 1, 1966, [Personal Information] purchased [Personal Information] Maple Ridge, BC.
456. On April 14, 1980, [Personal Information] purchased [Personal Information] Pitt Meadows, BC.
457. On August 11, 1993, [Personal Information] became co-owners of [Personal Information] [Personal Information] Maple Ridge, BC. [Personal Information] owned 10% interest.

458. On June 1, 2011, [Personal Information] applied with DLC to re-finance the property at [Personal Information] Pitt Meadows, BC. [Personal Information] [Personal Information] valued the property at "\$2,250,000 upon completion."
459. On June 17, 2011, CURTIS sent the following email to [Personal Information] (Antrim Investments):
- 459.1. "Im getting credit apps from the two owners (mom and dad) and their son who is building this with them they want to borrow 1.3 mill if possible They owe 300 000 now but I told them you would have be in first position so they want to try to get 1,000,000.00 and 300 000 to the first lender now. Are you interested in this deal? If so what is rate we can offer them?"
- 459.2. The son referenced by CURTIS was [Personal Information]
- 459.3. [Personal Information] is the co-owner of a business called [Personal Information] In 2005, [Personal Information] purchased [Personal Information] Mission, BC for \$200,000. At the time of purchase, [Personal Information] provided his address as [Personal Information] Maple Ridge, BC. (The property owned by his parents.)
460. On June 21, 2011, Antrim Investments arranged for a first mortgage for the [Personal Information] with Antrim Balanced Mortgage Fund. The mortgage was for \$1,200,000.
461. Records show that the gross mortgage proceeds from Antrim Balanced Mortgage Fund of \$830,000 was paid to the law office of [Personal Information] The balance of proceeds, \$791,415.55, was sent to [Personal Information] n trust.
462. A letter from Antrim Investment Mortgage Fund Ltd, dated June 30, 2010, showed the property valued at \$2,250,000 "when completed" and \$1,750,000 "as is." The value was stroked out and written as \$2,450,000. The proposed mortgage was stroked out and written as \$1,470,000.
463. The BC Assessment Roll value of [Personal Information] for 2012 was \$773,283.



### Unusual aspects of the mortgage transaction as identified by FICOM:

464. The property is in the agricultural land reserve.
465. Good credit and presumed affluence (owns 2 other properties and sale of his company [Personal Information] retail stores with [Personal Information] (2011) and credit bureau shows a personal line of credit of \$312K (balance as of June 2011 \$307K).
466. [Personal Information] (believed to be son) owns [Personal Information], Mission, but, according to the Motor Vehicle Branch, resides at [Personal Information] Maple Ridge, BC.
467. This was a private sale.

### FINTRAC Information

468. On October 13, 2010, [Personal Information] made one cash deposit to CIBC account totalling \$18,000.00 CAD. The account held jointly with [Personal Information]
469. On June 21, 2013, one electronic funds transfer ordered by [Personal Information] to the benefit of [Personal Information], listed in Germany, totalling \$61,000.00 EUR.
470. Cash deposits conducted to accounts held at [Personal Information] [Personal Information] by [Personal Information]
471. On January 8, 2009 and June 1, 2009, cash deposits were conducted by [Personal Information] [Personal Information] totalling \$24,400.00 CAD.
472. From December 16, 2010 to December 27, 2013, cash deposits were conducted by an unknown individual totalling \$133,263.71 CAD.
473. On many occasions, several cash deposits were conducted on the same day, each totalling less than \$10,000.00 CAD. For example, on April 4, 2013, 19 cash deposits were conducted ranging from \$12.00 CAD to \$2,847.60 CAD.
474. Electronic Funds Transfers ordered by [Personal Information] from July 17, 2008 to September 27, 2012, totalling \$162,967.95 USD. The beneficiaries of the EFTs were entities located in the United States.

475. Electronic funds transfers ordered to the benefit of [Personal Information] from September 23, 2010 to April 25, 2013, totalling \$411,031.67 CAD and \$123,246.70 USD. The ordering clients of the EFTs were various entities listed in Malta, the United States, and Canada.

476. [Personal Information] ceased to be a director of [Personal Information] on February 15, 2013.

[Personal Information]

[Personal Information] Kelowna, BC

477. On March 27, 2003, [Personal Information] (long-term disability) purchased [Personal Information] Kelowna, BC for \$204,900. On September 5, 2009, [Personal Information] sold [Personal Information] for \$380,000.

478. On September 7, 2009, it appears [Personal Information] attempted to buy [Personal Information] Kelowna, BC for \$310,000. A DLC mortgage application was completed. CURTIS tried to arrange financing for a first mortgage of \$175,000 [Personal Information]

479. On July 24, 2009, a DLC mortgage application showed [Personal Information] as the owner of [Personal Information] Kelowna, BC for 6 years. He named his current employer as [Personal Information], where he worked full time as the manager with an annual income was \$80,000.

479.1. [Personal Information] is owned by Eathan SKWIRA. The business was dissolved in August 2008 for failing to file.

479.2. [Personal Information] has been associated to fraud investigations – Vancouver Police 2010-177510 and Vancouver Police 2010-180994.

480. SKWIRA claimed he owned property at [Personal Information], Kelowna, BC with an estimated value \$310,000. [Personal Information] carried a first mortgage with a balance of \$167,000.

- 480.1. There is no [Personal Information] in Kelowna, BC.
- 480.2. [Personal Information] provided his address as [Personal Information] Prince Rupert, BC when he purchased [Personal Information], Kelowna, BC from SKWIRA.
- 480.3. [Personal Information] is an RCMP Officer.
481. On September 30, 2009, [Personal Information] sold [Personal Information] BC for \$380,000. At the time, SKWIRA was in the process of divorcing his wife, [Personal Information]. It appears [Personal Information] gave his parents, [Personal Information] the proceeds of the sale of [Personal Information]. According to a Gift Letter, [Personal Information] gave \$125,000 to [Personal Information] towards the purchase of a residence. The gift was not repayable. Of note, in the letter [Personal Information] provided his address as [Personal Information] Kamloops, BC, which belongs to his parents.

### Background/Associates

482. [Personal Information] and Eathan SKWIRA are brothers.
483. [Personal Information] is associated to the [Personal Information] (MC) Okanagan as a “hang around.” In a 2012, police checked [Personal Information] after observing him getting into a vehicle with [Personal Information] at the [Personal Information]. [Personal Information] originally provided a false name of [Personal Information] which SKWIRA claimed was a nickname.

[Personal Information]

### Second Mortgage - [Personal Information] Kelowna, BC

484. [Personal Information] are the registered owners of [Personal Information] Kamloops, BC.
485. They are the parents of Eathan SKWIRA and [Personal Information]

486. On September 30, 2009, [Personal Information] gave his parents \$125,000 towards the purchase of a residence via a Gift Letter. This followed the sale of [Personal Information] residence at [Personal Information] Kelowna, BC.
487. On October 9, 2009, [Personal Information] re-financed a mortgage on a property located at [Personal Information] Kelowna, BC. [Personal Information] are the registered owners. [Personal Information] arranged financing through DLC BC Mortgage Group for \$185,000. The lender was [Personal Information]. Grant CURTIS was the sub-mortgage broker. Eathan SKWIRA received a referral fee.
488. On May 3, 2010, [Personal Information] sold [Personal Information] Kelowna, BC to [Personal Information] for \$325,000. [Personal Information] and the [Personal Information] used the same realtor.
489. On May 4, 2010, [Personal Information] bought [Personal Information] Kelowna, BC for \$205,000. [Personal Information] used DLC to obtain a mortgage with [Personal Information] for \$130,000. Eathan SKWIRA received a 50% split on the referral fee.

[Personal Information]

### Referral Fee Recipient

490. [Personal Information] was a recipient of a referral fee on the DLC payroll documents for clients [Personal Information]
- 490.1. No details provided on [Personal Information]
491. On June 17, 2010, [Personal Information] applied for a mortgage through Grant CURTIS on a property located at [Personal Information] Burnaby o
492. According to FICOM, Antrim received an appraisal for preliminary consideration, but it was unknown if Antrim granted a loan. The borrower appeared to a numbered company [Personal Information]
- 492.1. [Personal Information] is a federally incorporated company.

492.2. The director is [Personal Information]

### Background/Associates

493. [Personal Information] has historical link to Grant CURTIS via a 1997 Harley Davidson motorcycle (VIN: 1HD1BKL13VY030292). Registration was transferred through the following:

493.1. Originally registered to Grant Brian CURTIS.

493.2. On March 11, 2004, registration was transferred to [Personal Information]

493.3. On April 8, 2014, registration was transferred to Eathan SWKIRA.

493.4. On June 24, 2006, registration was transferred to [Personal Information] of Quesnel; however, the PODL attached belonged to Eathan SKWIRA.

493.5. Registered terminated on July 26, 2006.

494. [Personal Information] is possibly a previous director (there were [Personal Information] about the same age) that were involved in a company called [Personal Information] with a [Personal Information] (known in Lower Mainland to be associated to the Empire Gang) as well as [Personal Information] (Empire Gang).

495. [Personal Information] as a current BC Registered company called [Personal Information] [Personal Information] incorporated number 0647819.

[Personal Information]

### First Mortgage - Sunshine Coast Highway

496. [Personal Information] used Grant CURTIS to broker a mortgage with First National. [Personal Information] received a referral fee.

497. On September 15, 2010, [Personal Information] applied for a mortgage to purchase [Personal Information] Sechelt, BC for \$475,000. [Personal Information] provided

his address at [Personal Information] Vancouver, which he had rented since September 2007.

498. On September 17, 2010, a First National Financial Mortgage Application included comments from Grant CURTIS: "Client owns and operates a painting business. Qualified income - I grossed up 15%. Great credit and next to no debt. Any questions let me know [Personal Information]. Will be living there with his girlfriend but she is not on mortgage or title."
499. On October 9, 2010, [Personal Information] prepared two contracts of purchase and sale; one for [Personal Information] for \$475,000 and the other for [Personal Information] [Personal Information] for \$50,000. [Personal Information] of [Personal Information] Sechelt, BC, owned both lots.
500. On November 29, 2010, the Land Title Office registered a transfer of title to [Personal Information]
501. On January 4, 2012, [Personal Information] sold [Personal Information] for \$207,000.00.
502. On September 19, 2012, First National Financial GP Corporation registered a Certificate of Pending Litigation (BB1498708) against [Personal Information] in Supreme Foreclosure, Vancouver Law Courts.
503. On December 10, 2013, [Personal Information] sold [Personal Information] for \$303,333.
504. On December 10, 2013, the civil action brought by First National Financial was cancelled.

**Unusual aspects of the mortgage transaction as reported by FICOM:**

505. According to the mortgage application, [Personal Information] is the self-owner/operator of [Personal Information].
506. No apparent internet footprint for [Personal Information] or purported painting business [Personal Information] (no business listings or ads found).

507. Current and historical BC Registry search for [Personal Information] showed no results.
508. The Notice of Assessment may not be genuine (However, FICOM did not elaborate.)
509. Current stated address on application and MVB appears to be a mail box business.
510. All other stated addresses on credit bureau and MVB appear to be commercial addresses, except [Personal Information]

### Background/Associates

511. According to his BCDL, [Personal Information] was previously known as [Personal Information]. [Personal Information] His BCDL was changed in 2005.
512. On January 29, 2008, Mission RCMP arrested [Personal Information] for drug-related offences (Mission RCMP File 2008-1364). [Personal Information] was charged for production and possession of a controlled substance under the CDSA.

[Personal Information]

### Possible Mortgage

513. According to FICOM, CURTIS forwarded an appraisal, dated November 25, 2011, to Antrim Investments for preliminary consideration. No other information was provided.

### Background/Associates

514. [Personal Information] is the President, Secretary and Director of [Personal Information] [Personal Information] Langley By Pass, Langley, BC. The Registrar of Companies flagged the company as “not in good standing.” The last annual report was filed in 2011 and there were 8 liens against the company.
515. [Personal Information] was a Director for a BC Numbered company, which was in the process of being dissolved.

516. Personal Information did not own any BC Registered property.

## CONCLUSION

517. As FICOM noted in their report: “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.” All of the intelligence information gathered to date supports this theory.
518. As noted previously in this report, FinCEN defined “Money laundering” as the disguising of funds derived from an illicit activity so that the funds may be used without detection of the illegal activity that produced them. Money laundering is a well-thought out process accomplished in three stages:
- 518.1. Placement: Requires physically moving and placing the funds into financial institutions or the retail economy. Depositing structured amounts of cash into the banking sector, and smuggling currency across international borders for further deposit, are common methods for placement.
  - 518.2. Layering: Once the illicit funds have entered the financial system, multiple and sometimes complex financial transactions are conducted to further conceal their illegal nature, and to make it difficult to identify the source of the funds or eliminate an audit trail. Purchasing monetary instruments (traveler's checks, banks drafts, money orders, letters of credit, securities, bonds, etc) with other monetary instruments, transferring funds between accounts, and using wire transfers facilitate layering.
  - 518.3. Integration: The illicit funds re-enter the economy disguised as legitimate business earnings (securities, businesses, real estate). Unnecessary loans may be obtained to disguise illicit funds as the proceeds of business loans.



519. The documents obtained by FICOM shows that SKWIRA referred many of the borrowers to CURTIS. Certainly reviewing other investigations involving SKWIRA suggests that SKWIRA was involved in a number of fraudulent activities in the same timeframe as the mortgages brokered by CURTIS. SKWIRA's illicit activities Included personation, uttering forged identification documents, boat loan frauds, and mortgage fraud.
520. Eathan SKWIRA's history suggests that he has a propensity for fraud and may well be facilitating the suspected money-laundering scheme, either directly as a referral source for CURTIS, or indirectly through his associates. Certainly much of CURTIS' referrals stem from SKWIRA either directly or indirectly.
521. Sulaiman SAFI is a self-confessed money launderer who was working with SKWIRA in laundering money for an organized crime group in and around the same timeframe as the suspected mortgages arranged by CURTIS.
- 521.1. SAFI was in the process of "placing" funds by smuggling currency across international borders as was documented in the trial of SAFI's kidnappers (refer to Vancouver File 2011-170962).
- 521.2. In addition, in the civil suit, Normak Investments Ltd v. Belcuig 2015 BCSC 700, the Judge identified SAFI as having orchestrated the mortgage fraud involving Personal Information
- 521.3. B.C. Supreme Court Justice Catherine J. Bruce characterized SAFI as: "... both careful and sophisticated. He was very careful to insulate himself from detection by the police in a wide variety of circumstances. He drove a Porsche that was leased by a friend [CURTIS]; he obtained a driver's licence in his wife's family name; he used encrypted Blackberry cellular telephones for drug transactions and money laundering; and he owned properties registered in other peoples' names."
522. Grant CURTIS arranged secondary mortgages through the same financial institutions, typically sub-prime lenders. The sub-prime lenders provide loans to higher risk lenders and as such charge a higher rate of interest than a prime lender such as a major bank. One sub-prime lender, Antrim Investments Ltd,

through its subsidiaries, provided loans to CURTIS' clients charging 10 – 11.5 % interest. This would constitute the “layering” of funds.

523. It is unknown if Antrim Investments Ltd was complicit in the suspected scheme. Legitimately they benefited from the interest paid on the loans but may have been willfully blind.
524. Background checks on CURTIS, SKWIRA and SAFI as well as CURTIS' clients demonstrates a history and complex relationship among these individuals that appears to extend beyond the average mortgage broker and referred clientele.
525. It is hypothesized that the mortgages, particularly, the secondary mortgages, were being used to launder money as a form of integrating money with legitimate funds:
  - 525.1. CURTIS arranged second mortgage loans with Antrim Investments.
  - 525.2. Antrim Investments used a private lender, which is wholly owned and operated by Antrim Investments.
  - 525.3. Antrim advanced funds to the borrowers.
  - 525.4. The borrower repaid the loan with the proceeds of crime; thus, the “integration” of funds.
526. While there are indicators of money laundering the difficulty is in establishing the source of the illicit funds in order to prove an offence.
527. The probe conducted by FSOC indicates that organized crime groups in the Lower Mainland may have been using secondary mortgage financing in order to launder funds and that this practice may still be occurring.
528. Unfortunately, FSOC's probe into the activities of CURTIS, et al., was brought to a close with the merge of Group 1's Victoria Team with Group 3, which resulted in the end of the active investigation.
529. If further investigation was deemed warranted, consideration should be given, but not limited, to:

- 529.1. interviewing Personal Information
- 529.2. interviewing CURTIS's clients;
- 529.3. seeking a production orders on Antrim Investments, and,
- 529.4. seeking production orders for financial records.

Cpl. Karen Best, [REDACTED]

E Div Federal Serious and Organized Crime

Group 3, Team 7

2016-03-15

E DIV (VIR) RCMP  
NARRATIVE TEXT HARDCOPY

GO# 5001 2013-215

Narrative: **OCCURRENCE REPORT - 8**

**Reply from FSOC Financial Integrity**

Author: [REDACTED] **BEST, KAREN**

Related date: **Wednesday, 2017-Jan-04 at: 08:15**

Related event: **GO 50012013215**

On January 4, 2017, at 2:55 pm, Cpl. Karen BEST received a reply from S/Sgt. John TAYLOR of FSOC Financial Integrity section:

*You have done exceptional work on this file. Your report is very well written. We have assigned this to CM Lynne Murphy for analysis. She is very much aware of Grant Curtis and is eager to glean what she can from your work. When Lynne is finished her analysis we will likely document this on our file (which is currently closed), 5000-2012-7310.*

No further action will be taken in this matter. Consequently, Cpl. BEST recommends this file should be concluded.

Cpl. Karen BEST  
FSOC Group 3 Victoria  
[REDACTED]

\*\*\* END OF HARDCOPY \*\*\*



\*\*\* CONFIDENTIAL \*\*\*

E DIV (VIR) RCMP  
NARRATIVE TEXT HARDCOPY

GO# 5001 2013-215

Narrative: **SYNOPSIS - 1**  
**SYNOPSIS**

Author: ( [REDACTED] ) **BEST, KAREN**

Related date: **Tuesday, 2013-Aug-13 at: 08:56**

Related event: **GO 50012013215**

The Financial Institution Commission of BC (FICOM) provided information related to mortgage broker Grant CURTIS. This investigation was initiated through cursory examination by the RCMP's IMET and subsequently passed on for further follow up by FSOC. An investigational probe was conducted on CURTIS' activities and his associates in relation to suspected money laundering and mortgage fraud. It is believed the offences were based in the Lower Mainland of BC.

A detailed report was completed finding that there appeared to be activities that warranted further investigation. The report was sent to FSOC Financial Integrity for their information and action if capacity existed for further investigation. Financial Integrity section elected not to pursue the matter but passed on the report to the FSOC analysts for intel purposes.

The file investigation material is held on E&R (P drive) with EDiv FSOC.

Cpl. Karen BEST  
FSOC Group 3 - Victoria  
[REDACTED]

\*\*\* END OF HARDCOPY \*\*\*



\*\*\* CONFIDENTIAL \*\*\*