

I am forwarding my comments for consideration; With respect to the Review of Canada's Anti-Money Laundering and Anti-Terrorist Financing Regime.

Why are law enforcement agencies reluctant to engage in Proceeds of Crime Investigations?

- Lack of specific National Priorities for POC targets
- FINTRAC must have closer ties and disclosure with law enforcement agencies (each agency may have a vital piece of the puzzle.)
- Complexity of investigations; officers require specialist training
- Officer Tenure in a police bureau generally 5 years (why should officer invest in specialized financial investigative training?)
- Manpower Canada Police agencies 188 officers per 100,000 population,
- England – Wales 302 per 100,000
- N.I. 372 per 100,000
- Scotland 324 per 100,000
- Loophole: Lawyer Trust funds are ripe for abuse
- Penalties for POC are light
- \$\$\$ Trickle down of Financial compensation from Federal Government to agencies that commit valuable resources.
- Civil asset forfeiture offers a simpler route to seizure

I hereby grant permission to reveal my personal details if so required.

Thanks you for the opportunity to submit my comments. I wish you every success in safeguarding our country.

George Harrison