



Director General
Financial Systems Division
Financial Sector Policy Branch
Department of Finance Canada
James Michael Flaherty Building
90 Elgin Street
Ottawa, ON
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Dear Director General:

The purpose of this letter is to support the recommendation stated in the Department of Finance Canada consultation paper entitled "Reviewing Canada's Anti-Money Laundering and Anti-Terrorist Financing Regime", that section 55(3) of the *Proceeds of Crime Money Laundering and Terrorist Financing Act* (PCMLTFA) be amended to give FINTRAC the authority to disclose financial intelligence to the Competition Bureau.

The RCMP has been a partner of the Competition Bureau since the late 1990s in relation to the investigation of; mass marketing fraud, cartels (including price-fixing conspiracies, market allocation and output restrictions) , and bid rigging, collectively "criminal offences". The RCMP also jointly manages the Canadian Anti-Fraud Center along with the Competition Bureau and the Ontario Provincial Police.

The Competition Bureau is an important member of each of the national mass marketing fraud partnerships across the country, and as well is an active member of the International Mass Marketing Fraud Working Group.

The criminal offences that the Competition Bureau investigates by their nature, often involve a significant money laundering component. Money obtained through the commission of any of these criminal offences is, by definition, proceeds of crime (i.e. the proceeds of any offence that may be prosecuted as an indictable offence in Canada). As with other financial crimes, the offences that the Competition Bureau investigates involve money, is often placed into the financial system and laundered in order to disguise its source, before being used for other purposes under the veil of legitimacy. These offences directly and indirectly impact Canadian consumers, either through their impact on victims

of fraud, or by making consumers pay more for goods and services than they otherwise would, absent the existence of a cartel or bid-rigging arrangement.

Based on our experience in investigating financial crimes, receiving FINTRAC disclosures would not only assist the Bureau in making investigative links and connecting money to specific mass marketing, cartel or bid-rigging offences, but would also enhance the ability of the Bureau to conduct proceeds of crime and money laundering offences.

The Competition Bureau is an important criminal law enforcement agency that investigates financial crimes involving multi-millions of dollars that often involve proceeds of crime and money laundering offences. Providing the Competition Bureau with FINTRAC reports will enhance the Bureau's ability to investigate the crimes under its mandate, and thus protect Canadian consumers and businesses from these crimes.

Yours sincerely,



Scott Doran, Chief Superintendent
Director General, Financial Crime & Cyber Crime