

Consolidated Recommendations

Pursuant to section 2(a) of the Terms of Reference of this Commission of Inquiry, I make the following recommendations.

Provincial Anti-Money Laundering Regime

Recommendation 1: I recommend that the Province establish an independent office of the Legislature focused on anti-money laundering, referred to throughout this Report as the Anti-Money Laundering (AML) Commissioner. The AML Commissioner should be responsible for:

- producing a publicly available annual report on money laundering risks, activity, and responses, as well as special reports on specific issues;
- undertaking, directing, and supporting research on money laundering issues in order to develop expertise on money laundering issues, including emerging trends and responses, informed by an understanding of the measures taken internationally;
- issuing policy advice and recommendations to government, law enforcement, and regulatory bodies concerning money laundering issues;
- monitoring, reviewing, auditing, and reporting on the performance of provincial agencies with an anti-money laundering mandate; and
- leading working groups and co-operative efforts to address money laundering issues.

Recommendation 2: I recommend that the Province maintain the Deputy Ministers' Committee and Anti-Money Laundering Secretariat and that they be given responsibility for the continued development and implementation of the provincial anti-money laundering strategy, including the implementation of measures identified in this Report.

Recommendation 3: I recommend that the Province introduce a statutory requirement that all government agencies, regulators, and law enforcement bodies with an anti-money laundering mandate designate an anti-money laundering liaison officer to be the primary point of contact for improved inter-agency collaboration and information sharing.

Casinos

Recommendation 4: I recommend that the threshold for requiring proof of the source of funds for casino transactions conducted in cash and other bearer monetary instruments be lowered to \$3,000.

Recommendation 5: I recommend that the Minister Responsible for Gaming direct the British Columbia Lottery Corporation to implement 100 percent account-based, known play in British Columbia's casinos within a timeframe specified by the minister.

Recommendation 6: I recommend that current limits on the amounts that casinos are able to pay out to patrons in the form of convenience cheques remain in place.

Recommendation 7: I recommend that the Province ensure that the Independent Gaming Control Office, once established, maintain the authority to issue directives to the British Columbia Lottery Corporation without the consent of the Minister Responsible for Gaming or any other external authority.

Real Estate Licensing

Recommendation 8: I recommend that the Province amend the *Real Estate Services Regulation* to bring the employees of developers within the licensing scheme.

Recommendation 9: I recommend that the Province bring business-scale "for lease by owner" and "for sale by owner" operations into the licensing scheme for real estate service providers.

Real Estate Regulation by the BC Financial Services Authority

Recommendation 10: I recommend that the Ministry of Finance consult with the British Columbia Financial Services Authority regarding its data needs and put in place measures to accommodate those needs, in a manner that respects the relevant privacy interests arising in this context.

Recommendation 11: I recommend that the British Columbia Financial Services Authority (BCFSA) make inquiries with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) to determine whether it plans to institute a source-of-funds inquiry requirement for licensees. If FINTRAC does not plan to do so, I recommend that the BCFSA require real estate licensees to ask clients about their source of funds at the outset of the client relationship, and record the information provided.

Recommendation 12: I recommend that the British Columbia Financial Services Authority use its rule-making authority to mandate that brokerages demonstrate the existence of an anti-money laundering compliance program as a condition of licensing.

Recommendation 13: I recommend that the Province allocate sufficient resources to the British Columbia Financial Services Authority to ensure that it has the capacity to address allegations of serious misconduct in a timely way.

Regulation of Mortgage Brokers

Recommendation 14: I recommend that the Province amend the *Mortgage Brokers Act* definition of “mortgage broker” to harmonize it with the requirement for registration.

Recommendation 15: I recommend that the Registrar of Mortgage Brokers make it a requirement that applicants for registration provide an extended criminal and police background check, showing not only convictions and outstanding charges but also past charges relating to financial misconduct, as well as police database information about the person.

Recommendation 16: I recommend that, in its revision of the *Mortgage Brokers Act*, the Province include a requirement that brokerages submit annual information returns to give the Registrar of Mortgage Brokers better insight into industry trends and risks.

Recommendation 17: I recommend that the Province give the British Columbia Financial Services Authority rule-making authority in respect of mortgage brokers.

Recommendation 18: I recommend that the Province amend the *Mortgage Brokers Act* to create a managing broker role with clearly defined responsibilities.

Recommendation 19: I recommend that the Registrar of Mortgage Brokers require education for both managing brokers and sub-brokers, focusing on the detection and reporting of fraud and money laundering in the industry.

Recommendation 20: I recommend that the Province amend the *Mortgage Brokers Act* to allow for larger financial penalties, up to \$250,000, to align with penalties available under the *Real Estate Services Act*.

Recommendation 21: I recommend that the Province amend the *Mortgage Brokers Act* to give the Registrar of Mortgage Brokers the power to make an order of disgorgement of profits for registered mortgage brokers found to have engaged in misconduct and for unregistered persons engaged in mortgage brokering activities.

Recommendation 22: I recommend that the British Columbia Financial Services Authority impose a positive obligation on real estate licensees to report suspected unregistered mortgage brokering to it.

Recommendation 23: I recommend that the Province amend the *Mortgage Brokers Act* to eliminate the automatic stay pending appeal found in section 9(2) of the Act.

Recommendation 24: I recommend that the British Columbia Financial Services Authority work with the new dedicated provincial money laundering intelligence and investigation unit to develop an information-sharing partnership.

Recommendation 25: I recommend that the provincial Minister of Finance urge her federal counterpart to make mortgage brokers reporting entities under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

Recommendation 26: I recommend that the Province create a positive obligation on mortgage lenders to make source-of-funds inquiries of investors providing capital for the lending business, if such obligations are not included in the federal reforms to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and associated Regulations.

Recommendation 27: I recommend that the Province amend Form B (the form for registration of a mortgage under section 225 of the *Land Title Act*) so that all legal owners of mortgage charges are reported, and that this information be available through the land titles registry.

Recommendation 28: I recommend that Province amend the definition of “interest in land” in the *Land Owner Transparency Act* to include mortgages, in order to ensure that the beneficial owners of a charge cannot obscure their ownership.

Recommendation 29: I recommend that the Province enact legislation directed at private mortgage lenders providing for registration, oversight, and enforcement. This regime should be separate from the scheme applicable to those engaged in brokering loans.

Recommendation 30: I recommend that the Province ensure that the regulator of private mortgage lenders has access to land title data, including new mortgage registrations, in a form that allows it to identify private lenders that ought to be registered with the regulator but are not.

Private Lending

Recommendation 31: I recommend that the Province implement a mandatory source-of-funds declaration to be filed with the court in every claim for the recovery of a debt, such that no action in debt or petition in foreclosure can be filed (except by an exempted person or entity) in the absence of such a declaration.

Recommendation 32: I recommend that the Province enact legislation authorizing the court, in its discretion, to refuse to grant the order(s) sought by the plaintiff in a debt action or foreclosure petition if it is not satisfied that the declaration is truthful and accurate, or if it concludes that the funds advanced by the lender were derived from criminal activity.

Land Owner Transparency

Recommendation 33: I recommend that the Province remove, by way of amendment to the *Land Owner Transparency Act* and/or its Regulations, the fee requirement for law enforcement and regulators with an anti-money laundering mandate who wish to access the Land Owner Transparency Registry.

Recommendation 34: I recommend that, within three years of the Land Owner Transparency Registry being populated with historical data, the AML Commissioner report to the Province with any recommendations for improvement to the registry. These recommendations should be informed by the AML Commissioner's study of the effectiveness of the registry and consultation with entities that are permitted to perform section 30(1) *Land Owner Transparency Act* searches.

Improving Real Estate Data Collection

Recommendation 35: I recommend that the Ministry of Finance – either in conjunction with Canada Mortgage and Housing Corporation or on its own – develop the required data and conduct a market integrity analysis in order to identify suspicious transactions and activity in real estate.

Recommendation 36: I recommend that the Province give the Land Title and Survey Authority a clear and enduring anti-money laundering mandate, including the ability to more readily share data with other agencies having a complementary anti-money laundering mandate.

Recommendation 37: I recommend that the Province give the Financial Real Estate and Data Analytics Unit an express anti-money laundering mandate, so that it can prioritize data analysis and policy development that will further anti-money laundering objectives.

Recommendation 38: I recommend that the Ministry of Finance develop an action plan for addressing the data gaps and data quality issues identified by the federal-provincial working group on real estate in its reports, focusing on data issues within the Province’s jurisdiction.

Recommendation 39: I recommend that the Province adopt a modified “hybrid” model of data management (as contemplated in the federal-provincial working group on real estate reports) and that the AML Commissioner fulfill the function of analyzing data for anti–money laundering purposes.

Recommendation 40: I recommend that the Land Title and Survey Authority make information about historical mortgage and property ownership available through an online search.

Recommendation 41: I recommend that the Province amend the Land Title and Survey Authority’s enabling legislation to direct the collection of information on real estate agents and mortgage brokers involved in a property transaction. At a minimum, this information should be available to the Ministry of Finance, the British Columbia Financial Services Authority, law enforcement, and other federal and provincial agencies with an anti–money laundering mandate.

Recommendation 42: I recommend that the Province institute the use of unique identifiers for Land Title and Survey Authority records.

Recommendation 43: I recommend that the Province remove the fee requirement presently charged to access the Land Title and Survey Authority’s records for law enforcement and regulators with an anti–money laundering mandate.

Real Estate Prices

Recommendation 44: I recommend that, as the Province implements new policies and measures against money laundering in real estate, it analyze the impact of those reforms on housing prices.

Banks and Credit Unions

Recommendation 45: I recommend that the British Columbia Financial Services Authority develop anti–money laundering guidance for credit unions.

Recommendation 46: I recommend that the Province provide the British Columbia Financial Services Authority with a clear, enduring anti–money laundering mandate.

Recommendation 47: I recommend that the Province provide sufficient resources to the British Columbia Financial Services Authority (BCFSA) to create or staff an anti–money laundering group. This group should serve as a contact point for BCFSA with law enforcement, public-private partnerships, and other government stakeholders.

Information Sharing and Collaboration Among Financial Institutions

Recommendation 48: I recommend that the Attorney General of British Columbia urge the appropriate federal minister to introduce amendments to the federal *Personal Information Protection and Electronic Documents Act*, providing for a “safe harbour provision” allowing financial institutions to share information related to potential money laundering activity.

Recommendation 49: I recommend that the Province introduce, in consultation with the Office of the Information and Privacy Commissioner, a safe harbour provision allowing provincially regulated financial institutions to share information related to potential money laundering activity.

Recommendation 50: I recommend that the Attorney General of British Columbia engage with his federal counterpart and other stakeholders to implement a formal “keep open” regime for financial institutions in which they can, at the request of law enforcement, keep an account suspected of involvement in money laundering open in order to further a law enforcement investigation.

Money Services Businesses

Recommendation 51: I recommend that the Province expand the mandate of the British Columbia Financial Services Authority to encompass regulation of money services businesses. The regulatory scheme should include (but not be limited to) the following:

- a definition of “money services business” that aligns with the definition in the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)*, except that virtual asset service providers should not be included at this stage;
- a capacity to identify unregistered money services businesses and sanction them;
- a registration process in which the suitability of applicants is assessed in a broader manner than is done under the *PCMLTFA* to include consideration of whether a money services business has been investigated or charged with criminal activity, whether or not this has resulted in a conviction, as well as a requirement to disclose business relationships in the same way as the Quebec regime;
- a compliance examination process that applies in the early years of a money services business’s existence;
- the ability to enter information-sharing arrangements with the Financial Transactions and Reports Analysis Centre of Canada and other relevant entities; and
- the availability of administrative and monetary penalties.

Beneficial Ownership Registry

Recommendation 52: I recommend that the Province work with its federal, provincial, and territorial partners to ensure that, before the end of 2023, a publicly accessible pan-Canadian corporate beneficial ownership registry is in place.

Improving Metrics and Collaboration Between Law Societies

Recommendation 53: I recommend that the Law Society of British Columbia work with the Federation of Law Societies of Canada to develop uniform metrics to track, at a minimum:

- the nature and frequency of breaches of rules that are relevant to anti-money laundering regulation;
- the number of breaches that are referred for investigation or into a remedial stream;
- the outcome of the referrals, including the nature and frequency of sanctions that are imposed;
- the rules, policies, and processes law societies have regarding information sharing with and referrals to law enforcement;
- the frequency, nature, and circumstances of the information sharing or referrals, including whether this includes sharing of non-public or compelled information and the stage of a proceeding or investigation at which it occurs; and
- the use of data analytics by law societies.

Recommendation 54: I recommend that the Law Society of British Columbia and the Federation of Law Societies of Canada develop systems to facilitate the more effective sharing of tactical information and coordination on investigations that affect multiple jurisdictions or involve lawyers who practise in multiple jurisdictions.

Amendments to Law Society Rules

Recommendation 55: I recommend that the Law Society of British Columbia amend Rule 3-59 of the *Law Society Rules* to make explicit that any cash received under the professional fees exception to the cash transactions rule must be commensurate with the amount required for a retainer or reasonably anticipated fees.

Recommendation 56: I recommend that the Law Society of British Columbia amend its client identification and verification rules to explain what is required when inquiring into a client's source of money. The rules should make clear, at a minimum:

- that the client identification and verification rules require the lawyer to record the information specified in the fall 2019 *Benchers' Bulletin*;

- the meaning of the term “source of money”; and
- that lawyers must consider whether the source of money is reasonable and proportionate to the client’s profile.

Recommendation 57: I recommend that the Law Society of British Columbia extend the ambit of its client identification and verification rules to include the situations in which a lawyer is truly acting as a gatekeeper. The rules should be extended to include, at a minimum:

- the formation of corporations, trusts, and other legal entities;
- real estate transactions that may not involve the transfer of funds, such as assisting with the transfer of title; and
- litigation involving enforcement of private loans.

Recommendation 58: I recommend that the Law Society of British Columbia amend the *Law Society Rules* to require lawyers to verify a client’s identity when holding fiduciary property on the client’s behalf.

Recommendation 59: I recommend that the Law Society of British Columbia amend Rule 3-58.1 of the *Law Society Rules* to clarify, at a minimum, what is meant by “directly related to legal services” and to consider how to further limit the use of trust accounts so that they are used only when necessary.

Recommendation 60: I recommend that the Law Society of British Columbia promptly remove Commentary [3.1](a) from the *Code of Professional Conduct for British Columbia*.

Lawyers’ Anti–Money Laundering Training

Recommendation 61: I recommend that the Law Society of British Columbia require that all trust auditors and investigators charged with investigating possible transgressions of the trust accounting rules receive anti–money laundering training.

Recommendation 62: I recommend that the Law Society of British Columbia implement mandatory anti–money laundering training for lawyers who are most at risk of facing money laundering threats. The education should be required, at a minimum, for lawyers engaged in the following activities:

- the formation of corporations, trusts, and other legal entities;
- transactional work, including real estate transactions;
- some transactions that do not involve the transfer of funds (such as transfer of title); and
- litigation involving private lending.

Law Society: Improving Collaboration and Information Sharing

Recommendation 63: I recommend that the British Columbia Solicitor General direct law enforcement to refer matters involving lawyers to the Law Society of British Columbia where appropriate, and that the Law Society continue its advocacy with government, regulators, and other stakeholders about its role and when referrals to the Law Society should be made.

Recommendation 64: I recommend that the Law Society of British Columbia review and assess its approach to determining whether it possesses information or documents that may be evidence of an offence, and, if so, whether the executive director should seek approval from the Discipline Committee to deliver the information or documents to law enforcement.

Recommendation 65: I recommend that the Law Society of British Columbia and the Province work to increase public awareness of measures available to investigate wrongdoing involving lawyers, including:

- the limitations on the use of a lawyer's trust account;
- the information-sharing agreements that exist between the Law Society and government agencies;
- the ability of the Law Society to refer matters to law enforcement when there is evidence of a potential offence; and
- the pathways that exist for law enforcement to obtain information about lawyers during investigations.

British Columbia Notaries

Recommendation 66: I recommend that the Province, in consultation with the Society of Notaries Public of British Columbia, raise the maximum fine that can be imposed when a member of the Society is guilty of misconduct as set out in the *Notaries Act*.

Recommendation 67: I recommend that the Society of Notaries Public of British Columbia require its members to obtain, record, and keep records of the source of funds from their clients when those members engage in or give instructions with respect to financial transactions.

Recommendation 68: I recommend that the Society of Notaries Public of British Columbia educate its members on the money laundering risks relating to private lending through educational materials or other means.

Accountants

Recommendation 69: I recommend that the Chartered Professional Accountants of British Columbia (CPABC) amend its *Code of Professional Conduct* to specify that members must report to CPABC a finding by the Financial Transactions and Reports Analysis Centre of Canada that a member has not complied with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

Recommendation 70: I recommend that the Province study the nature and scope of work performed by unregulated accountants in British Columbia to determine where they work, what clientele they service, what services they provide, whether those services engage a significant risk of facilitating money laundering, and, if so, what form of anti-money laundering regulation and oversight is warranted.

Recommendation 71: I recommend that the provincial Minister of Finance urge her federal counterpart to introduce amendments to the *Proceeds of Crime (Money Laundering) and Financing of Terrorism Act* so that accountants' reporting and other obligations arise when they prepare for and provide advice about triggering activities.

Recommendation 72: I recommend that the Chartered Professional Accountants of British Columbia implement client identification and verification requirements, as well as requirements to verify a client's source of funds, that apply, at a minimum, when a chartered professional accountant engages in the following activities:

- preparing for and providing advice with respect to financial transactions, including real estate transactions;
- preparing for and providing advice with respect to the use of corporations and other legal entities; and
- private-sector bookkeeping.

Recommendation 73: I recommend that the Chartered Professional Accountants of British Columbia promptly determine how many of its members operate trust accounts, for what purpose, and in what circumstances.

Recommendation 74: I recommend that the Chartered Professional Accountants of British Columbia implement a trust account auditing regime in which chartered professional accountants and firms that operate a trust account are audited on a regular basis, and that a sample of chartered professional accountants and firms that report not operating a trust account be audited to ensure that is the case.

Recommendation 75: I recommend that the Chartered Professional Accountants of British Columbia determine the circumstances in which its members accept cash from clients and in what amounts.

Recommendation 76: I recommend that the Chartered Professional Accountants of British Columbia implement a cash transactions rule limiting the amount of cash its members can receive in a single client matter.

Recommendation 77: I recommend that the Chartered Professional Accountants of British Columbia determine how often its members engage in the activities specified in section 47 of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations*.

Recommendation 78: I recommend that the Chartered Professional Accountants of British Columbia (CPABC) expand its practice review program to address anti-money laundering issues including, at a minimum:

- compliance with client identification and verification measures implemented by CPABC;
- audits of trust accounts or confirmation that a member does not operate a trust account; and
- assessment of the adequacy of the anti-money laundering policies and programs in place by the member to ensure compliance with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

Recommendation 79: I recommend that the Chartered Professional Accountants of British Columbia implement a mandatory continuing professional education requirement focused on anti-money laundering that applies, at a minimum, to chartered professional accountants who engage in the following activities:

- the activities specified in section 47 of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations*;
- preparing for and providing advice with respect to financial transactions, including real estate transactions;
- preparing for and providing advice with respect to the use of corporations and other legal entities; and
- private-sector bookkeeping.

Recommendation 80: I recommend that the Chartered Professional Accountants of Canada follow up with the Financial Transactions and Reports Analysis Centre, on an ongoing basis, to acquire and maintain insights into the level of reporting and compliance of its membership with the requirements of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*.

Recommendation 81: I recommend that the Chartered Professional Accountants of British Columbia pass bylaws or rules enabling it to share information with law enforcement in appropriate circumstances.

Luxury Goods

Recommendation 82: I recommend that the Province implement a universal record-keeping and reporting requirement for cash transactions of \$10,000 or more. Every business that accepts \$10,000 or more in cash in a single transaction or a series of related transactions should be required to:

- verify a customer’s identification and record their name, address, and date of birth;
- inquire into and record the source of funds used to make the purchase;
- determine whether the purchase is being made on behalf of a third party and, if so, inquire into and record the identity of that third party; and
- report the transaction – including the total amount of cash accepted; the item or service purchased; the source of funds reported by the customer; whether the purchase was made on behalf of a third party and, if so, the identity of that third party; and the name, address, and date of birth of the customer – to the Province.

The Province should ensure that the AML Commissioner has access to these reports.

The universal record-keeping and reporting requirement should apply in all circumstances, with some narrow exceptions:

- one-time transactions between private individuals;
- financial institutions and financial services businesses;
- lawyers; and
- other situations where it is determined that the requirement would be unduly onerous, generate reports of little value, or is otherwise inappropriate.

Recommendation 83: I recommend that the Province establish a mechanism by which a minister, in consultation with the AML Commissioner, can implement timely measures to address new and evolving risks in the luxury goods sector (as defined in Chapter 34 of this Report).

Recommendation 84: I recommend that the Province regulate the purchase and sale of vehicles for the purpose of export from British Columbia. This regulation should involve, at a minimum, a registration requirement for those who export more than an identified number of vehicles annually and a requirement that the export of all vehicles by registered exporters be reported prior to export.

Recommendation 85: I recommend that the Province amend the *Provincial Sales Tax Act* to ensure that information collected for the purpose of processing provincial sales tax rebates is available, at a minimum, to the Vehicle Sales Authority and the AML Commissioner.

Virtual Assets

Recommendation 86: I recommend that the Province, in consultation with the AML Commissioner and the dedicated provincial money laundering intelligence and investigation unit, ensure that law enforcement, regulators, and Crown counsel with relevant duties are trained to recognize indicators and typologies of money laundering through virtual assets.

Recommendation 87: I recommend that the Province implement a regulatory regime for virtual asset service providers. In determining which authority is best placed to act as the regulator, the Province should consult with the AML Commissioner, the British Columbia Financial Services Authority, the British Columbia Securities Commission, industry members, and other stakeholders.

Trade-Based Money Laundering

Recommendation 88: I recommend that the dedicated provincial money laundering intelligence and investigation unit implement and make use of the software developed by Professor John Zdanowicz, or other software with the same capability, as part of its intelligence functions.

Enforcement

Recommendation 89: I recommend that all provincial and municipal law enforcement agencies in British Columbia implement a policy requiring all officers involved in the investigation of profit-oriented crime to consider money laundering and proceeds of crime issues at the outset of the investigation and, where feasible, conduct an investigation with a view to pursuing those charges, and identifying assets for seizure and/or forfeiture.

Recommendation 90: I recommend that all provincial and municipal law enforcement agencies involved in the investigation of profit-oriented crime develop training modules to ensure that their members have the knowledge and skills to pursue money laundering and proceeds of crime investigations, and identify assets for seizure and/or forfeiture.

Recommendation 91: I recommend that the Province create a dedicated provincial money laundering intelligence and investigation unit to lead the law enforcement response to money laundering in this province by (a) identifying, investigating, and disrupting sophisticated money laundering activity, and (b) training and otherwise supporting other investigators in the investigation of the money laundering and proceeds of crime offences.

Recommendation 92: I recommend that the AML Commissioner and the Policing and Security Branch make best efforts to monitor the response to money laundering within the RCMP federal police service by seeking detailed metrics concerning the resources dedicated to money laundering investigations, the number of money laundering investigations undertaken by the RCMP, and the results of those investigations.

Recommendation 93: I recommend that the Policing and Security Branch develop a way of tracking FINTRAC disclosures made in response to voluntary information records, in order to ensure that they are received promptly.

Recommendation 94: I recommend that the Province ensure that there is sufficient surveillance capacity within the Combined Forces Special Enforcement Unit to support the work of the new dedicated provincial money laundering intelligence and investigation unit.

Recommendation 95: I recommend that the AML Commissioner conduct a comprehensive review of the provincial money laundering intelligence and investigation unit every five years to ensure it remains relevant and effective.

Criminal Asset Forfeiture

Recommendation 96: I recommend that law enforcement bodies implement a policy requiring that all investigators conducting investigations into profit-oriented crime consider the criminal asset forfeiture provisions and, where feasible, develop the evidentiary basis necessary to support a forfeiture application.

Recommendation 97: I recommend that law enforcement bodies implement a policy requiring that all investigators conducting investigations into profit-oriented crime include, in their Report to Crown Counsel, information concerning the assets owned or controlled by the target of the investigation (and their associates) along with recommendations concerning possible forfeiture applications.

Recommendation 98: I recommend that the Province ensure that all investigators and prosecutors addressing profit-oriented criminal activity receive training on the importance and use of the criminal forfeiture provisions.

Civil Asset Forfeiture

Recommendation 99: I recommend that the Civil Forfeiture Office significantly expand its operational capacity by adding investigators and analysts capable of identifying and targeting unlawfully obtained assets and instruments of unlawful activity beyond those identified in the police file.

Recommendation 100: I recommend that the Province transition the Civil Forfeiture Office from a self-funded agency to a government-funded agency, in which the revenue generated by the Civil Forfeiture Office flows to government.

Recommendation 101: I recommend that the Province proceed with its plan to develop an unexplained wealth order regime in British Columbia.