

Federal Court



Cour fédérale

Date: 20101230

Docket: T-307-09

Ottawa, Ontario, December 30, 2010

PRESENT: The Honourable Mr. Justice Lemieux

IN THE MATTER OF

**AN APPLICATION UNDER RULES 300 AND 301 OF THE
FEDERAL COURTS RULES AND PARAGRAPH 83.14(1)(a) OF
THE *CRIMINAL CODE* FOR A FORFEITURE ORDER**

BETWEEN:

HER MAJESTY THE QUEEN

Applicant

and

THE WORLD TAMIL MOVEMENT OF QUEBEC

Respondent

FORFEITURE ORDER

UPON REVIEWING THE APPLICATION in writing made on the 2nd day of March, 2009, by the Attorney General of Canada for a Forfeiture Order pursuant to paragraph 83.14(1)(a) of the *Criminal Code*;

UPON READING THE AFFIDAVIT of Corporal Steve Dubreuil in support of that application, sworn the 31st day of March, 2009, a redacted copy of which is appended as Exhibit A to this Order but without the Appendices to that affidavit;

UPON BEING ADVISED by counsel for the respondent that it does not contest the issuance of the Forfeiture Order;

UPON BEING SATISFIED on a balance of probabilities that the property described in Appendices A-1 to A-3 and also described in the affidavit of Steve Dubreuil, is owned or controlled by or on behalf of a terrorist group pursuant to subsection 83.14(5) of the *Criminal Code*;

UPON BEING SATISFIED that notice was given to the respondent and to any other person who appears to have an interest in the property pursuant to subsections 83.14(4)(7) of the *Criminal Code*;

UPON BEING SATISFIED that the Bank of Nova Scotia has been duly notified;

UPON BEING SATISFIED that the Bank of Nova Scotia has met the requirements of subsection 83.14(8) of the *Criminal Code*;

AND UPON BEING SATISFIED that counsels for the applicant and the respondent and the owners consent to the Bank's petition;

THIS COURT ORDERS that:

1. Unless specifically provided by this Order or by the *Criminal Code*, no variation shall be made to this Order other than by Order of this court. Any application for variation of this Order shall provide for at least 10 days notice to the Attorney General of Canada and the World Tamil Movement of Quebec;
2. The property hereinafter described shall be forfeited to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law:

An emplacement known and described as being lot number TWO MILLION SIX HUNDRED FORTY-NINE THOUSAND SEVEN HUNDRED AND SIXTY-EIGHT (2 649 768) of the Cadastre of Quebec, land registration division of Montreal.

With all the buildings thereon erected and more specifically that bearing civic numbers 4160 and 4162 Van Horne Avenue, Montreal, Province of Quebec, H3S 1S1

As the whole now subsists with all servitudes active and passive, apparent or occult attached thereto, and namely subject to a servitude of passage published under number 488 135 and subject to a servitude of view published under number 2 873 585.

3. The property hereinafter described shall be forfeited to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law:

Commercial bank account number 4336-0928569 in the name of the World Tamil Movement of Quebec located at the TD Canada Trust Bank, 8200 Decarie Boulevard, Montreal, Province of Quebec, H4P 2P5, and the content of said bank account;

4. The property described in Exhibit A to this Order, property also described as schedule A to C in Appendix 3 to the affidavit of Steve Dubreuil, said property currently being held by the Royal Canadian Mounted Police at 4225 Dorchester Blvd., Westmount, Quebec, shall be forfeited to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law;

5. The Restraint Orders of the above-described immovable and of the above-described bank account, both Orders rendered on April 10, 2008 under Dockets Number DES-9-08, are cancelled;
6. The radiation of the inscription of the Restraint Order published at the Office of the Land Registrar of Quebec for the Cadastre of Montreal under number 15 105 964;
7. It is further ordered that the terms and conditions of the Confidentiality Order issued by this Court on September 29, 2009 shall remain of full force and effect;
8. It is further ordered that the forfeiture order does not affect the interest of the Bank of Nova Scotia in the immovable, such interest being those of a mortgagee, for an amount of 97 051,66 and interests calculated on said amount at a rate of 1.50% per year from July 16, 2010;

Service and registration

9. The Court Registry shall forward to the parties, namely, the Attorney General of Canada, Quebec Regional Office, and the solicitors to the World Tamil Movement of Quebec a certified copy of this Order to which is appended as Exhibit A the redacted affidavit of Steve Dubreuil without its Appendices.
10. Any notice or delivery of material required by or in relation to the present Order shall be effected as follows:

The Attorney General of Canada
Pierre ROY, Counsel for the Director of Public Prosecutions
Public Prosecution Services of Canada
Quebec Regional Office
4225 Dorchester Blvd., 6th Floor
Westmount (Quebec) H3Z 1V5
Tel: (514) 939-8409
Fax: (514) 939-8460
File: 1-194207

11. A copy of this Order but without its Exhibit A shall be served by the Director of Public Prosecutions, Quebec Region, as soon as practicable on the following parties, by a peace officer to the party in person or by leaving a copy with a person apparently 16 years of age or older at the party's residence or place of business, or by registered mail as directed by the Court:

- a. **Seized Property Management Directorate**
C/O **Jean CADRIN**
4225 Dorchester Blvd., 6th Floor
Westmount (Quebec) H3Z 1V5
- b. **Land Registrar of Quebec**
C/O Land Registrar
Montreal Bureau
2050, rue de Bleury, local #RC 10 and 1.10
Montreal (Quebec) H3A 2J5
- c. **Bank of Nova Scotia and its Subsidiaries and Affiliates**
4861 Van Horne Avenue
Montreal (Quebec) H3Q 1J2
- d. **TD Canada Trust Bank and its Subsidiaries and Affiliates**
8200 Decarie Boulevard
Montreal (Quebec) H4P 2P5
- e. **Thanesegaram CHANDRASEGARAM**
- f. **Sivanathan SIVARAMAN**
- g. **World Tamil Movement of Quebec**
4160, 4162 Van Horne Avenue
Montreal (Quebec) H3S 1S1

C/O **Kathiravelupillai SITHAMP ARANATHAN**
President of the World Tamil Movement of Quebec
- h. **Student Association of the World Tamil Movement**
4160 Van Horne Avenue
Montreal (Quebec) H3S 1S1

C/O **Sivanathan SIVARAMAN**
Administrator

12. Service of this Order shall be effected on the following parties by service on M. Steven G. Slimovitch, counsel for the World Tamil Movement of Quebec. M. Steven G. Slimovitch will then forward photocopies of certified copies of this Order without its Exhibit A to the following parties by registered mail within 30 days of this Order being issued:

- a. **Muralee Karan THURAIRATNAM**
Leader of the World Tamil Movement of Quebec
- b. **Kathiravelupillai SITHAMPARANATHAN**
President of the World Tamil Movement of Quebec
- c. **Anton MANICKAM**
- d. **The Occupant**
7720 Pie IX Boulevard, unit 1
Montreal (Quebec) H2A 2G9

13. Any person served by the Director of Public Prosecutions, Quebec Region, or by Counsel for the World Tamil Movement of Quebec may request a copy of the redacted affidavit of Steve Dubreuil which is Exhibit A to this Order which shall be provided to that party upon payment of the cost of reproduction Exhibit A.

14. A copy of this Order and its redacted affidavit of Steve Dubreuil (without the appendices to that affidavit) shall be posted on this Court's website making it available to the public through this medium.

“François Lemieux”

Judge

**I HEREBY CERTIFY that the above document
Is at true copy of the original issued out of / filed in
The Court on the 30th day of December A.D. 2010
Dated this 30th day of December 2010
“Nancy Allen”
Registry Officer**

Exhibit A

TABLE OF CONTENTS

GLOSSARY	5
PART I	7
1 SOURCE OF INFORMATION	9
1.1 Use of Bold, Italic styles and source information	9
1.2 Confirmation of information provided by other officers and other employees of the Federal Government	10
1.3 Supertext	10
1.4 The Informants	10
1.4.1 Informant "B"	10
1.4.2 Informant "F"	11
1.5 Surveillance and surveillance reports	12
1.6 Forensic Accounting Reports	12
1.7 Data banks	12
1.7.1 Canadian Police Information Center ("CPIC")	12
1.7.2 Quebec Enterprise Registrar / Centre informatisé du registre des entreprises du Québec ("CIDREQ")	13
1.8 Dictionary and Encyclopaedia	13
1.9 On-line Encyclopaedias and other sources of information on the Internet	13
1.10 Authors, researchers and experts	16
1.11 Translation	17
1.12 Spelling of names in the Affidavit	17
1.13 Abbreviations utilized in this Affidavit	17
2 PREVIOUS APPLICATIONS	18
3 JUDICIAL AUTHORIZATIONS OBTAINED IN THE COURSE OF THIS INVESTIGATION	18
PART II	20
4 OVERVIEW	20
5 GROUNDS FOR BELIEF	21
6 LIBERATION TIGERS OF TAMIL EELAM (LTTE)	22
6.1 History of Sri-Lanka and the conflict between its people	23
6.2 Definition of TAMIL EELAM	23
6.3 Creation of the LTTE	24
6.4 Terrorist acts committed by the LTTE	25
6.5 Leader of LTTE: Velupillai PRABHAKARAN (Pirabaharan)	29
6.6 Anton BALASINGHAM	30
6.7 The LTTE FLAG	31
6.8 A listed entity in Canada	31
6.9 Outside Canada: Proscription of the LTTE as a terrorist group	32
6.10 The International Secretariat	32
6.11 Foreign Branches	36
6.12 The LTTE Manual of "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam"	36
6.13 The LTTE training for the Foreign Activists	40
7 WORLD TAMIL MOVEMENT OF MONTREAL ("WTM") - A FOREIGN BRANCH OF THE LTTE	44
7.1 Legal Status of the WTM - A non profit Organization	44
7.2 Listing of WTM - 2008-06-13	45

8	SUBJECTS INVOLVED IN THIS INVESTIGATION.....	45
8.1	Registered owners of 4160 and 4162 Van Horne Avenue, Montreal.....	45
8.2	Members of the WTM in alphabetical order.....	47
9	LTTE SEMINAR FOR THE FOREIGN ACTIVISTS IN SRI LANKA - JULY 20 TH TO JULY 30 TH , 2004.....	51
9.1	The WTM President SITHAMPARANATHAN attended the LTTE Training in Sri Lanka.....	52
9.2	Thanasegaram CHANDRASEGARAM - TRAINED AS AN LTTE ACTIVIST.....	55
9.3	Santhirakumar PERAMPALAM - TRAINED AS AN LTTE ACTIVIST.....	56
9.4	Muralee Karan THURAIRATNAM met with PRABHAKARAN.....	57
10	WTM MEMBERS OPERATE AS PER THE DIRECTIVES OF THE LTTE OPERATIONS MANUAL.....	58
10.1	Propaganda and Media.....	58
10.1.1	Tamil publications.....	59
10.1.2	The Martyr's Day 2003.....	61
10.1.3	The Martyr's Day 2004.....	63
10.1.4	The Martyr's Day 2006.....	67
10.1.5	The Martyr's Day 2007.....	69
10.1.6	The Martyr's Day 2008.....	73
10.1.7	The Black Tigers Day 2004.....	73
10.1.8	The Black Tigers Day 2005.....	76
10.1.9	15 th Anniversary of the "TRO" - October 7 th , 2006.....	77
10.1.10	Local fundraising events associated to the WTM and LTTE.....	79
10.1.11	Exhibitions and Special publications.....	79
10.1.12	Political contacts.....	80
10.1.13	Publication Division.....	83
10.2	Fundraising.....	85
10.2.1	Bank Accounts of the WTM.....	86
10.2.2	WTM financial reporting documents.....	88
10.2.3	Fundraising method 1 – Pre-Authorized Payment Plan called Electronic Fund Transfers "EFT".....	92
10.2.3.1	Procurement of WTM banking records.....	95
10.2.3.2	Forensic accounting reports.....	96
10.2.3.3	The WTM reports to the LTTE via K. MANIVANNAN of the International Secretariat.....	97
10.2.4	Interviews with witnesses of pre-authorized payment scheme.....	99
10.2.4.1	Witness "A".....	100
10.2.4.2	Witness "B".....	102
10.2.4.3	Witness "C".....	103
10.2.4.4	Witness "D".....	105
10.2.4.5	Witness "E".....	106
10.2.5	Fundraising Method 2 - Revenues through activists of the WTM.....	108
10.2.6	Fundraising method 3- Tamil Eelam Economic Development Organization.....	109
10.2.7	Fundraising Method 4 - The WTM distributes newspapers for the benefit of the LTTE.....	111
10.2.8	Fundraising Method 5- Large Fundraising Campaign by the LTTE - Tamils Savings Fund.....	113
10.2.9	Fundraising method 6 – Collection through tills.....	120
10.2.10	Fundraising method 7 - Revenues through social and sporting events.....	121

11	FUND TRANSFERS FROM THE WTM TO THE LTTE VIA THE INTERNATIONAL SECRETARIAT	121
11.1	Other related bank accounts	122
11.1.1	WTM Ontario	122
11.1.2	122
11.2	Fund transfer - September 2004 - \$24,000	124
11.2.1	Transfer of \$7,000 via WTM Toronto to the International Secretariat in September 2004	125
11.2.2	Transfer of \$17,000 via WTM Toronto to the International Secretariat in September 2004	126
11.2.3	Related transactions of the Toronto WTM September 2004 - \$30,000	127
11.3	October 2004 - \$15,000 transfer from the WTM to the LTTE via the International Secretariat	127
11.4	December 2004 - \$10,000 transfer from the WTM to the LTTE via the International Secretariat	129
11.5	\$3,000 transfer from the WTM to the Toronto WTM	131
11.6	May to October 2005 - \$105,000	131
11.6.1	June 21 st , 2005, Mathy \$10,000	132
11.6.2	June 30 th , 2005, Mathy \$10,000	133
11.6.3	July 8 th , 2005, Mathy \$25,000	134
11.6.4	July 25 th , 2005, Mathy \$10,000	136
11.6.5	July 27 th , 2005, Mathy \$32,000	138
11.6.6	August 31 st , 2005, Yogamalar \$18,000	140
11.7	Fund transfer from the Tamil Rehabilitation Organization ("TRO")	140
12	THE SUB-ORGANIZATIONS OF THE WTM	140
12.1	Student Federations	141
12.2	Women Federation	143
12.3	Creative art clubs	145
12.4	Chencholai, Arivucholai	148
12.5	General associations of Eelam Tamil	150
12.6	Educational centres	151
12.7	Sports Division	152
13	CORRESPONDANCE BETWEEN WTM AND LTTE	153
13.1	Letter of the 36 activists	153
13.2	Travel documents	155
14	USE OF WTM BUILDING – 4160 AND 4162 VAN HORNE, MONTREAL	157
14.1	Description of 4160 and 4162 Van Horne	157
14.2	Mortgage and Bank account at the Bank of Nova Scotia	159
14.3	WTM pays for expenses related to the building at 4160-4162 Van Horne Avenue	164
14.3.1	Hot water tank	164
14.3.2	Office insurance	164
14.3.3	CHANDRASEGARAM is paid as an activist	165
15	SURVEILLANCE ON WTM MEMBERS FOLLOWING THE LISTING OF THE LTTE AS A TERRORIST GROUP	165
15.1	Surveillance at 4160-4162 Van Horne, Montreal and the municipal recycling depot located at 6925 chemin Côte-des-Neiges, Montreal	165
15.2	Surveillance of THURAIRATNAM on April 12 th , 2006	166
16	EVIDENCE TO SUPPORT THE APPLICATION FOR FORFEITURE OF THE ITEMS SEIZED	169

16.1 4160 Van Horne Avenue, Montreal on April 12th, 2006 170
16.2 4162 Van Horne Avenue, Montreal April 12th, 2006 171
16.3 7720 PIE IX Boulevard, unit 1, Montreal 171
16.4 [REDACTED] 172
16.5 4160 and 4162 Van Horne on September 3rd, 2008 173
17 TESTIMONY OF SITHAMPARANATHAN, THE PRESIDENT OF THE WTM 173
PART III 175
18 A SUMMARY OF THE FACTS UPON WHICH I BASE THIS BELIEF IS AS
FOLLOWS 175
18.1 Links between the LTTE and the WTM 176
18.2 CHANDRASEGARAM - co-owner of 4160 and 4162 Van Horne Avenue 176
18.3 SIVARAMAN – Co-owner of 4160 and 4162 Van Horne Avenue 177
18.4 SITHAMPARANATHAN - The President of the WTM 178
18.5 The building- 4160 and 4162 Van Horne Avenue, Montreal 179
18.6 The Fundraising by the WTM is controlled and administered from its offices at
4160 and 4162 Van Horne Avenue, Montreal 179
18.7 The WTM TD bank account #4336-0928569 180
18.8 Exhibit items 181
19 CONFIDENTIALITY 181
20 SERVICE AND REGISTRATION 182
21 RELIEFS REQUESTED 183

GLOSSARY

LIST OF MOST PERTINENT NAMES, SUB-ORGANIZATIONS AND BANK ACCOUNTS MENTIONED IN THIS AFFIDAVIT

In order to facilitate the reading of this Affidavit, below is the list and a brief description of the most important names, sub-organizations and bank accounts mentioned in this Affidavit.

WTM SUBJECTS INVOLVED IN THIS INVESTIGATION

- **Thanasegaram CHANDRASEGARAM** is the co-owner of 4160 and 4162 Van Horne Avenue, the joint account holder for the Mortgage account #583-636-6, a WTM activist and a WTM administrator in its first years.
- **Ramani BALENDRA** is the president of the Canadian Tamil Congress in Quebec and a WTM activist;
- **Manivannan KARUNANANTHASWAMY** is a WTM activist and the former WTM leader until 2005;
- **Anton MANICKAM** is a WTM activist and is the co-signing officer for the WTM TD bank account #4336-0928569 held at the TD Canada Trust Bank in Montreal since 1994;
- **Santhirakumar PERAMPALAM** is a trained activist of the WTM;
- **Kathiravelupillai SITHAMPARANATHAN** is the President of the WTM and is the co-signing officer for the WTM TD bank account #4336-0928569 held at the TD Canada Trust Bank in Montreal since 1994;
- **Sivanathan SIVARAMAN** is the co-owner of 4160 and 4162 Van Horne Avenue, Montreal and the joint account holder for the Mortgage account #583-636-6;
- **Muralee Karan THURAIRATNAM** was responsible of finance for WTM until he became leader of the WTM in 2005.

LTTE SUBJECTS MENTIONED IN THIS AFFIDAVIT

- **Velupillai PIRABAHARAN**, also known as PRABHAKARAN, is the LTTE Leader;
- **Veerakathi MANIVANNAN** is the Secretary of the LTTE International Secretariat;
- **MATHYARASAN**, also known as Mathy, is the person responsible for finance matters of the LTTE.

ORGANIZATIONS

- **Liberation Tigers Tamil Eelam ("LTTE")** is a the terrorist group;
- **World Tamil Movement of Montreal ("WTM")** is the foreign branch of the LTTE, located at 4160 and 4162 Van Horne Avenue, Montreal, and a listed terrorist entity in Canada since June 13th, 2008.

SUB-ORGANIZATIONS

- **Student Association of the World Tamil Movement ("SAWTM")** gives its address as 4160 Van Horne Avenue, Montreal and the administrator of this organization is Anton MANICKAM;
- **Eelam Tamil Association of Quebec ("ETAQ")** gives its address as 4162 Van Horne Avenue, Montreal and one of the administrators is Sivanathan SIVARAMAN;
- **The Academy of Tamil Arts and Technology ("ATAT")** gives its addresses as being 4160 Van Horne Avenue, Montreal and 3810 Rachel Street, Montreal. The last address is located next to THURAIRATNAM's residence.

BANK ACCOUNTS

- The **WTM TD bank account #4336-0928569** is the bank account sought to be forfeited; **Anton MANICKAM** and **Kathiravelupillai SITHAMPARANATHAN** are the co-signing officers;
- The **Mortgage account #583-636-6** at the Bank of Nova Scotia is for the building located at 4160 and 4162 Van Horne. **Thanasegaram CHANDRASEGARAM** and **Sivanathan SIVARAMAN** are the joint account holders for the mortgage account.

PART I

I, Steve DUBREUIL, of the City of Montreal, Province of Quebec, a Peace Officer and member of the Royal Canadian Mounted Police, MAKE OATH AND SAY AS FOLLOWS:

1. I am a Peace Officer and have been a member of the Royal Canadian Mounted Police since 1995. Within these years, I have acquired experience as a general duty member and a protective services officer. I am currently posted to the Integrated National Security Enforcement Team in Montreal ("INSET") and have been for the past 2 years and 10 months. I have been assigned to assist in Project CRIBLE and to investigate the offence under the *Criminal Code*.
2. This investigation involves a terrorist group known as the Liberation Tigers of Tamil Eelam ("LTTE"). This organization collects funds in Canada that I believe are used to finance terrorist activities in Sri Lanka. The LTTE operates in Canada through a front organization known as the World Tamil Movement ("WTM"); we must add that the WTM is represented by having branches in Toronto and Montreal. As the affiant, I have read the pertinent information in respect to this Application that has been gathered thus far for the purpose of project "CRIBLE". Since my assignment to project "CRIBLE" in November 2008, I have also been kept abreast of new developments in this investigation by my colleagues and by police reports which I have read. Unless otherwise specified when referring to the WTM in this Affidavit, I will be referring to the WTM in Montreal.
3. This Affidavit is made in support of an Application by the Attorney General of Canada for an Order of Forfeiture pursuant to paragraph 83.14(1)(a) of the *Criminal Code*, to forfeit property to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law, the said property being a building, located at 4160 and 4162 Van Horne Avenue, Montreal, as indicated in Appendix 1.
4. This Affidavit is also made in support of an Application by the Attorney General of Canada for an Order of Forfeiture pursuant to paragraph 83.14(1)(a) of the *Criminal Code*, to forfeit property to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law, the property being the contents of commercial TD Canada Trust bank account #4336-0928569, belonging to the WTM and located at the TD Canada Trust Bank, 8200 Decarie Boulevard, Montreal, as indicated in Appendix 2.
5. This Affidavit is also made in support of an Application by the Attorney General of Canada for an Order of Forfeiture pursuant to paragraph 83.14(1)(a) of the *Criminal Code*, to forfeit property to Her Majesty to be disposed of as the Attorney General directs or otherwise dealt with in accordance with the law, the property being the exhibits seized on April 11th, 2008, and on September 3rd, 2008, located at the RCMP, 4225 Dorchester, Westmount, as indicated in Appendix 3 - Schedules A, B, C, D and E.
6. I am also mindful to the fact that our investigation has revealed that the World Tamil Movement and the LTTE have been demonstrated to utilize pressure tactics to elicit funds and donations as well as to participate in veiled threats. The contents of some paragraphs of this Affidavit, as well as some exhibits, if circulated in the public domain would likely put some members of the Tamil community at risk. Therefore, some paragraphs and exhibits have been vetted and should remain confidential in the public

version of this Affidavit in order to avoid any identification.

7. This Affidavit will show that all the properties seized in April 2008 and all the properties seized in September 2008 are owned or controlled by a terrorist group, the WTM, on behalf of a terrorist group, the LTTE.
8. For the purpose of this Affidavit, "the properties" refers to:
 - The building, located at 4160 and 4162 Van Horne Avenue, Montreal;
 - The contents of commercial TD Canada Trust bank account #4336-0928569, belonging to the WTM and located at the TD Canada Trust Bank, 8200 Decarie Boulevard, Montreal;
 - Properties seized pursuant to Search Warrant issued on April 12th, 2006, for 4160 Van Horne Avenue, Montreal, which were then re-seized on April 11th, 2008;
 - Properties seized pursuant to Search Warrant issued on April 12th, 2006, for 4162 Van Horne Avenue, Montreal, which were then re-seized on April 11th, 2008;
 - Properties seized pursuant to Search Warrant issued on April 13th, 2006, for 7720 Boul. Pie-IX, unit 1, Montreal, which were then re-seized on April 11th, 2008;
 - Properties seized pursuant to Search Warrant issued on April 13th, 2006, for [REDACTED], which were then re-seized on April 11th, 2008;
 - Properties seized on September 3rd, 2008, at 4160 Van Horne Avenue, Montreal;
 - Properties seized on September 3rd, 2008, at 4162 Van Horne Avenue, Montreal.
9. This Affidavit will show that the Liberation Tigers of Tamil Eelam (LTTE) is a terrorist group that has been committing terrorist activities well before its listing in Canada in 2006.
10. This Affidavit will show that the World Tamil Movement (WTM) facilitated terrorist activities of the Liberation Tigers of Tamil Tigers (LTTE) and is therefore a terrorist group.
11. This Affidavit will show that Thanasegaram CHANDRASEGARAM, a member of the WTM, and Sivanathan SIVARAMAN facilitated terrorist activities of the WTM and the LTTE and, therefore, are terrorist groups, as per the following definitions.

Definition "terrorist group" – section 83.01(1) Criminal Code

"Terrorist group" means:

- (a) An entity that has as one of its purposes or activities facilitating or carrying out any terrorist activity, or
- (b) A listed entity, and includes an association of such entities

Definition "terrorist activity" – section 83.01(1) Criminal Code

"Terrorist activity" means:

- (b) An act or omission, in or outside Canada,
 - (i) that is committed
 - (B) in whole or in part with the intention of intimidating the public, or a segment of the public, with regard to its security, including its economic security, or compelling a person, a government or a domestic or an international organization to do or to refrain from doing any act, whether the public or the person, government or organization is inside or outside Canada, and
 - (ii) that intentionally
 - (A) causes death or serious bodily harm to a person by the use of violence,
 - (B) endangers a person's life,
 - (C) causes a serious risk to the health or safety of the public or any segment of the public,
 - (D) causes substantial property damage, whether to public or private property, if causing such damage is likely to result in the conduct or harm referred to in any of clauses (A) to (C),
 - (...)

Definition "entity" – section 83.01(1) Criminal Code

"Entity" means a person, group, trust, partnership or fund or an unincorporated association or organization.

- 12. I have personal knowledge of the matters and facts to which I depose in this Affidavit, save and except where stated to be on information and belief. I believe the facts and matters within my personal knowledge to be true. As to the facts based on information and belief, I believe them to be true.
- 13. Unless otherwise stated, all places referred to in this Affidavit are places within the province of Quebec. All the motor vehicle licence plate numbers referred to in this Affidavit are Quebec motor vehicle licence plate numbers, unless otherwise indicated.
- 14. I have obtained information hereinafter deposed to from the following sources, and where I have made reference to those materials in this Affidavit, I believe that information to be true:
 - Reviewing investigative evidence collected by other police officers;
 - Personally reviewing source debriefing reports and investigative reports filed by other police investigators and placed in the investigative record;
 - As well as all other sources of information mentioned hereinafter.

1 SOURCE OF INFORMATION

1.1 Use of Bold, Italic styles and source information

- 15. In this Affidavit, the text in bold corresponds to the source where the information

was obtained. *The information in brackets () is a reference to the source document, the photograph or the exhibit used to corroborate the information in the paragraph. The text in italic describes my own belief and comments in regards to the facts demonstrated in this Affidavit.*

1.2 Confirmation of information provided by other officers and other employees of the Federal Government

16. In the course of this investigation, police officers, members of other agencies and employees of the Federal Government have made observations or/and provided information relating to Project CRIBLE. I believe the information obtained from these people is accurate to the best of my knowledge, as I believe that in the execution of their duties they are compelled to record and state only what they believe to be true.
17. In the course of this investigation, I have also been advised of a parallel investigation, Project O'SALUKI, by Toronto INSET investigators into the activities of the Toronto WTM. I believe the information obtained from these people is accurate to the best of my knowledge, as I believe that in the execution of their duties they are compelled to record and state only what they believe to be true.

1.3 Supertext

18. Montreal INSET investigators have used throughout this investigation a Major Case Management software called Supertext. *Supertext is an off-the-shelf software used by the RCMP to manage major cases. The application's strength is in managing paper records, in particular paper exhibits. It allows for high-volume document management, in-depth searching and reporting from scanned documents and it allows information to be stored in a unique and organized format. Throughout this investigation, the common practice, when dealing with exhibits, was to scan the original into Supertext. A copy of the scanned document was then used by the Affiant throughout this Affidavit when referring to specific exhibits as documentary evidence to support a stated fact.*

1.4 The Informants

19. During the course of this investigation, members of INSET used confidential informants to obtain and corroborate information in relation to Project CRIBLE. The identity of these informants needs to remain anonymous and I will explain this further in this Affidavit. I have included in the following paragraphs information provided by three confidential informants.

1.4.1 Informant "B"

20. **Background:** Informant "B" is a coded RCMP source since [REDACTED] that has given information on several occasions to the police. Informant "B" identified 8 of the subjects of this investigation by viewing surveillance photographs.

Corroboration of information: The information provided by Informant "B" was corroborated throughout our investigation. Other information has been corroborated through police surveillance operations done during the course of this investigation. The subjects identified by Informant "B" from surveillance photographs have also been identified by our investigation. Some of the information has also been corroborated by 2 other coded police informants. Thus far, the information given by Informant "B" and used in the preparation of this document has been corroborated by our investigation, and therefore, I consider it reliable.

Level of detail of information provided by Informant "B": The information provided by Informant "B" implicates members of the WTM in fundraising activities on behalf of the WTM and the LTTE.

Origin of Informant "B"'s knowledge of the information: This person is a member of the Tamil community [REDACTED]. As such, Informant "B" has been requested to make financial contributions to the WTM by individuals that Informant "B" knows to be affiliated with the WTM. The information gathered came [REDACTED] members of the WTM and observations made by Informant "B".

[REDACTED]

Testimony of Informant "B": This informant does not want to testify and wants to remain anonymous.

Other applicable considerations: Informant "B" does not have a criminal record and has not received any financial benefits. Informant "B" did not ask to be compensated. Informant "B"'s motivation for providing information to the police is motivated by civic duties and by the desire to see the Tamil community live freely in Canada. On the basis of the information stated above, I believe to be true the information provided by Informant "B".

1.4.2 Informant "F"

21. **Background:** Informant "F" is a coded RCMP source since [REDACTED] and has given information on several occasions. Informant "F" has provided information on several individuals involved with the WTM and the LTTE.

Corroboration of information: The information provided by Informant "F" has been corroborated by intelligence gathered by police investigations and by information received from another source, namely Informant "B". Thus far the information given by Informant "F" and used in the preparation of this document has been corroborated by our investigation, therefore I consider it reliable.

Level of detail provided by Informant "F": The information supplied by Informant "F" pertained to telephone numbers and names of individuals associated with the WTM.

The information also related to fundraising methods of the WTM and locations of such activities in Montreal.

Origin of Informant "F"'s knowledge of the information: Informant "F" is a member of the [REDACTED] Tamil community and as such has first hand knowledge of the activities of the WTM within the community.

Testimony of Informant "F": Informant "F" does not wish to testify and wants to remain anonymous for security reasons.

Other applicable considerations: Informant "F" was not compensated for the information provided to the police.

1.5 Surveillance and surveillance reports

22. I have been involved in numerous investigations involving surveillance since May 2006, and I am familiar with the preparation of surveillance reports. Police surveillance operations conducted during the course of this investigation can be described in two categories. First, surveillance operations are sometimes conducted by a team made up of members of INSET who get together to do the operation. This type of team is only temporary since the investigators have other duties. Secondly, the surveillance operations are often assigned to the surveillance teams of the RCMP Special "O" Section. These teams are used specifically in surveillance operations. In both cases, the observations of those members are reported to a member of the team who is assigned the task of preparing a written report. During each daily surveillance operations an officer is assigned the responsibility of reporting the observations for all the members of the team for that shift. All members of the surveillance team subsequently ensure its accuracy by reviewing and signing the surveillance reports.

1.6 Forensic Accounting Reports

23. During the course of this investigation, investigators have used the services of accountants from the Forensic Accounting Management Group (FAMG) of Public Works and Government Services Canada (PWGSC) in order to compile and analyse the raw data and fact sheets that were obtained throughout the investigation. The accountants produced several reports from documentary evidence and exhibits supplied by the investigators and I believe that the facts and conclusions expressed by the accountant to be true.

1.7 Data banks

1.7.1 Canadian Police Information Center ("CPIC")

24. I have learned information from using police computer data based systems such as CPIC. CPIC is a national reference database in which information is recorded and stored regarding persons and articles of interest to police. The data entered in the police

computer data based systems is administered and managed by RCMP employees.

1.7.2 Quebec Enterprise Registrar / Centre informatisé du registre des entreprises du Québec ("CIDREQ")

25. Information concerning enterprises in Quebec is accessible to the public through the CIDREQ (Quebec Enterprise Registrar). The Enterprise Registrar maintains a public register to record, process, store and distribute the principal information concerning the identity of associations and enterprises incorporated or in operation in Quebec. This information has legal force. The public register was created by the *Act Respecting the Legal Publicity of Sole Proprietorships, Partnerships and Legal Persons*, (RSQ c. P-45) in order to receive and publicize the information declared by enterprises. The law is intended to protect the citizens and enterprises of Quebec in their business dealings. I believe the information contained therein is accurate. (38.1)

1.8 Dictionary and Encyclopaedia

26. *Le Petit Larousse Illustré*, 2002 Edition ("Le Petit Larousse"); (2.1)
Encyclopaedia Universalis, 2002 Edition ("Encyclopaedia Universalis"); (3.1)
The New Encyclopaedia Britannica, 15th Edition, 2003 Edition ("Encyclopaedia Britannica"). (4.1)
These are general knowledge publications that are generally found in libraries to which I give credence.

1.9 On-line Encyclopaedias and other sources of information on the Internet

27. **Council on Foreign Relations** has a website at www.cfr.org. It identifies itself as an on-line resource for everyone who wants to learn more about the complex international issues challenging policy makers and citizens alike. One of these topics is terrorism and America's response to terrorism. It is addressed to the general public (via the Internet) and provides, in a short and clear format, updated information from national security experts. (5.1)
28. **Britannica.com** is an on-line encyclopaedia created in 1994, derived from the *Encyclopaedia Britannica*. "Today *Encyclopaedia Britannica* has a larger and more diverse line of products than ever before. Our outlook is shaped by our tradition of excellence and an understanding of what knowledge seekers need in the digital age." (6.1)
29. **Jane's Information Group** is described on its website as "specialist in fields of defence, security, public safety, transport and law enforcement, Jane's intelligence is a 'must have' resource for Our clients, who can trust Our intelligence over that from any other open source." Jane's provides information to private organizations, governments, militaries and academics in more than 180 countries. (7.1)
30. **British Broadcasting Corporation** ("BBC") on-line news service is a division of the BBC. The BBC News describes as "the largest broadcasting corporation in the world. Its

mission is to enrich people's lives with programmes that *inform, educate and entertain*. It is a public service broadcaster, established by a Royal Charter and funded by the licence fee that is paid by UK households." (8.1)

31. **CNN World News** on-line news service identifies itself as being among the world's leaders in online news and information delivery. Its head office is located in Atlanta, United States, and operates 24 hours a day, 7 days a week. There are also several other offices around the world. This service relies on the expertise of close to 4000 news and media professionals. (9.1)
32. **Amnesty International** news service: Amnesty International describes itself as a worldwide movement of people who campaign for internationally recognized human rights to be respected and protected for everyone. Their mission is to conduct research and generate action to prevent and end grave abuses of human rights and to demand justice for those whose rights have been violated. Their members and supporters exert influence on governments, political bodies, companies and intergovernmental groups. (25.1)
33. **Human Rights Watch**: Human Rights Watch describes itself as one of the world's leading independent organizations dedicated to defending and protecting human rights. By focusing international attention where human rights are violated, they give voice to the oppressed and hold oppressors accountable for their crimes. Their rigorous, objective investigations and strategic, targeted advocacy build intense pressure for action and raise the cost of human rights abuse. On its website it states that "for 30 years, Human Rights Watch has worked tenaciously to lay the legal and moral groundwork for deep-rooted change and has fought to bring greater justice and security to people around the world." (26.1)
34. www.publicsafety.gc.ca Public Safety Canada (PS) was created in 2003 to ensure coordination across all federal departments and agencies responsible for national security and the safety of Canadians. From natural disasters to crime and terrorism, their mandate is to keep Canadians safe. (29.1)
35. www.canadagazette.gc.ca "The Canada Gazette is one of the vehicles that Canadians can use to access the laws and regulations that govern their daily lives. It has been the "official newspaper" of the Government of Canada since 1841. Government departments and agencies as well as the private sector are required by law to publish certain information in the Canada Gazette. The Canada Gazette contains all formal public notices and official appointments; proposed regulations; regulations; and public acts of Parliament from government departments and agencies. Miscellaneous public notices from private sector organizations that are required by statute to publish the notices and disseminate the information to the public are also published in the Canada Gazette. The Canada Gazette serves as a consultative tool between the Government of Canada and Canadians." (30.1)
36. www.spur.asn.au is an Australian website which means Society for Peace, Unity and Human Rights for Sri Lanka (SPUR). It "stands for all the objectives stated in its name." The primary objective of this site is "to present authentic and authoritative voices advancing the cause of peace, unity and human rights in Sri Lanka." (27.1)

37. www.tribuneindia.com "The Tribune now published from Chandigarh started publication on February 2nd, 1881, in Lahore (now in Pakistan). According to its website, The Tribune, the largest selling daily in North India, publishes news and views without any bias or prejudice of any kind. Restraint and moderation, rather than agitational language and partisanship, are the hallmarks of the paper. It is an independent newspaper in the real sense of the term. The English edition apart, the 128-year-old Tribune has two sister publications, Punjabi Tribune (in Punjabi) and Dainik Tribune (in Hindi)." (34.1)
38. www.tamilnation.org is a website that states the following: "tamilnation.org is concerned to tell a story about more than 70 million Tamils living today in many lands and across distant seas. It is about their heritage, their rich language and literature, and their vibrant culture. It is a story about a growing togetherness that is being consolidated by struggle and suffering." (10.1)
39. www.eelam.com is a website in favour of the armed freedom struggle in Sri Lanka. It is currently identified on the web as a site that could cause damage to a computer. (11.1)
40. www.tamilcanadian.com identifies itself as a website designed to provide information about the culture and history of the Tamil people from the island of Sri Lanka (Ceylon), specifically in regards to those Tamils who are currently living abroad in Canada. (12.1)
41. www.tamilnet.com identifies itself as an independent and non-profit newswire service that provides up to date news with Tamil perspective on issues concerning Tamil people in the island of Sri Lanka. (13.1)
42. www.tamilnaatham.com was created in December 2000. It is registered to Niruba RAJARATNAM of P.O. Box 81024, Burnaby, British Columbia. (15.1)
43. www.forbes.com is owned and operated by Forbes.com LLC. ("Forbes"). It describes itself as "a leading Internet media company that is among the most trusted resources for the world's business and investment leaders, providing them the uncompromising commentary, concise analysis, relevant tools and real-time reporting they need to succeed at work, profit from investing and have fun with the rewards of winning. Forbes.com includes real-time original reporting on business, technology, investing and lifestyle; stock and mutual fund quotes; comprehensive company profiles; a wide array of interactive tools, calculators and databases, including People Tracker, the annual Forbes Lists; a Lifestyle section that currently focuses on high-end vehicles, collecting, real estate and travel; and the complete online editions of Forbes' magazines." (14.1)
44. www.canada411.ca is an on-line directory listing information that originates from publicly available local telephone records for published telephone listings.
45. www.troonline.org is the website of the Tamil Rehabilitation Organization ("TRO"). (68.2)
46. www.trocanada.org is the website of the TRO of Canada. The page appears inactive. (68.3)
47. www.state.gov identifies itself as a website that serves as the United States

Department of State's portal of information on U.S. foreign policy and information about the State Department. It is managed by the Office of Electronic Information. It publishes reports entitled Patterns of Global Terrorism which are submitted in compliance with Title 22 of the United States Code. As required by legislation, these reports are provided to the Congress and include, among other things, detailed assessments of countries which support international terrorism and where significant terrorist acts have occurred in the past five years. (19.5)(19.1)

48. **Guardian Unlimited** is an on-line version of the British daily The Guardian, which was founded in 1821. "The Guardian Unlimited network of websites was launched in January 1999. By March 2001 it had over 2.4 million unique users, making it the most popular UK newspaper website." (18.1)
49. www.nationalpost.com is the website of one of Canada's national newspapers. (16.1)
50. www.singaporemirror.com describes itself as "a comprehensive Singapore BUSINESS DIRECTORY and information. It not only contains Singapore's major Products & Services and Companies' Profiles, but it also includes general information about Singapore so that visitor can find all the information about Singapore 'Under One Roof.'" (16.3)
51. www.defence.lk is the website for the Ministry of Defence, Public Security and Law and Order of Sri Lanka. (16.4)
52. www.dailynews.lk is the website for the newspaper Daily News which describes itself as Sri Lanka' national newspaper since 1918. (16.5)
53. www.lankanewspapers.com is a Sri Lankan website about news updates and discussions. (16.6)

1.10 Authors, researchers and experts

54. **Mr. K.M. De SILVA** is an author and professor of Sri Lanka History at the University of Ceylon, in Paradeniya, Sri Lanka. He has been the Executive Director of the International Centre for Ethnic Studies ("ICES"), in Kandy, Sri Lanka since its establishment in 1982. ICES is a non-profit, non-governmental organization whose objectives include the advancement of human rights, the promotion of international peace and a contribution to the efforts to attain national cohesion in Sri Lanka. Mr. De SILVA holds a Ph.D. in Literature from the University of London. Mr. De SILVA has written several books and articles on the history of Sri Lanka, ethnic conflicts and nationalism in South-East Asia, as well as other socio-political issues. (20.1)
55. **Rohan GUNARATNA**, as identified on the Dwight D. Eisenhower National Security Series and Wikipedia websites, is an author and researcher based in Singapore whose field of specialization is terrorism, particularly Islamic terrorism and especially groups in South East Asia. GUNARATNA has several university degrees, including a master of International Peace Studies from Notre-Dame University, United States, and a doctor's degree in International Relations from the University of St-Andrews, Scotland. He is also

an honorary fellow at the International Policy Institute for Counter-Terrorism in Israel and an associate professor with the Institute of Defence and Strategic Studies of the Nanyang Technological University in Singapore. Mr. GUNARATNA also worked for the United Nations and has published several books and articles on terrorism. (21.1)

56. **Yoran SCHWEITZER** is a researcher on terrorism and counter-terrorism with the Institute for Counter-Terrorism, in Israel. He has published many articles on the matter. A graduate of the University of Tel-Aviv, he has studied and researched various aspects of national security. He also works as a consultant for the Governments of Great Britain and Israel. (22.1)
57. **Ajit Kumar SINGH** is a research assistant for the Institute for Conflict Management in India.

1.11 Translation

58. In the course of this investigation, Project CRIBLE retained the services of translators when translation of Tamil language material was required. When a Tamil inscription is mentioned in English in this Affidavit, it is a result of translation which I believe to be accurate and true. When I believe English grammar mistakes or misspelling were made in the translation, I made the correction and believe they did not alter the meaning of the text. Our investigation has revealed that the World Tamil Movement and the LTTE have been demonstrated to utilize pressure tactics to elicit funds and donations as well as to participate in veiled threats. It is my belief that should members of the World Tamil Movement discover the identity of the translators they would re-visit those translators to discourage their participation in future cooperation with the police. These translators have cooperated with the police at certain risk to themselves in an effort to provide translations of seized documentation. Therefore it is essential to protect the identity of the translators.

1.12 Spelling of names in the Affidavit

59. The translators on Project CRIBLE said that it is not uncommon for the Tamil people to have a variation of the spelling of their names. In addition, the reversing of the given name with the surname has been observed in numerous occasions in this file. Throughout the course of this investigation, INSET investigators based the spelling of their subjects' names according to documents contained in their immigration file. The spelling of the names used throughout this Affidavit is therefore consistent with their immigration records.

1.13 Abbreviations utilized in this Affidavit

60. The following list sets out the abbreviations utilized within this Affidavit and is provided to display what each abbreviation represents. In doing so, I can ensure that while this document is concise, its brevity is maintained. Some of the abbreviations are listed below, however others not listed below will also be seen within brackets later throughout this Affidavit :

- Royal Canadian Mounted Police ("RCMP");
- Integrated National Security Enforcement Team ("INSET");
- Liberation Tigers of Tamil Eelam ("LTTE");
- World Tamil Movement of Montreal ("WTM");
- World Tamil Movement in Toronto ("Toronto WTM");
- World Tamil Movement in Ottawa ("Ottawa WTM").

2 PREVIOUS APPLICATIONS

61. This is the first Application for a Forfeiture Order with respect to the Properties.

3 JUDICIAL AUTHORIZATIONS OBTAINED IN THE COURSE OF THIS INVESTIGATION

The following is a description of some legal authorizations obtained in the course of this investigation since its beginning on June 5th, 2003, and mentioned in the present Affidavit.

62. Warrant to search #500-26-032702-049 granted by Justice of the Peace Gilles MICHAUD on November 9th, 2004, in Montreal. The Warrant authorized the search of documents or data held by the Royal Bank of Canada and related to an account held or maintained by CHANDRASEGARAM of [REDACTED]. Corporal Denis BOUDREAU ("Cpl. BOUDREAU") executed the Warrant and obtained copies of the documents concerning the bank account #0631-8230864 of CHANDRASEGARAM for the period covering February 1st, 2003, to November 8th, 2004. (23.1)
63. Warrant to search #500-26-032700-043 granted by Justice of the Peace Gilles MICHAUD on November 9th, 2004, in Montreal. The Warrant authorized the search for documents or data held by the TD Canada Trust Bank and related to an account held or maintained by the World Tamil Movement of 4160 Van Horne Avenue, Montreal. Cpl. BOUDREAU executed the Warrant and obtained copies of the documents concerning the WTM TD bank account #4336-0928569 for the period covering February 1st, 2003, to November 8th, 2004. (23.2)
64. Warrant to search #500-26-032746-046 granted by Justice of the Peace Gilles MICHAUD on November 12th, 2004, in Montreal. The Warrant authorized the search at the Customs Border Services Agency ("CBSA") in Montreal, for copies of documents, data and video or photograph obtained by custom agents during the verifications of three subjects of our investigation at their return from overseas trips. The persons subject to this search were:
- Manivannan KARUNANANTHASWAMY ("KARUNANANTHASWAMY") - Concerning CBSA's search of his luggage on April 10th, 2004, at Pearson International Airport in Toronto, Ontario;
 - Santhirakumar PERAMPALAM ("PERAMPALAM") - Concerning CBSA's search of his luggage on September 11th, 2004, at Vancouver International Airport in Richmond, British Columbia;

- > CHANDRASEGARAM - Concerning CBSA's search of his luggage on September 11th, 2004, at the Pierre-Elliott TRUDEAU's Airport in Montreal. **(23.3)**
65. Production Order granted by Justice of the Peace PAUL BENTLEY on January 3rd, 2006, in Toronto. The Order permitted to obtain the banking records of all the bank accounts held by the WTM as well as the WTM TD bank account #4336-0928569 for the period of July 9th, 2002, to December 30th, 2005. **(23.4)**
 66. Warrant to search #500-26-039292-069 granted by Justice of the Peace Louis DUGUAY on April 12th, 2006, in Montreal. The Warrant authorized the search at 4160 Van Horne Avenue, Montreal. Investigators executed the Warrant to search on April 12th, 2006. **(23.5) (Appendix 3 - Schedule A)**
 67. Warrant to search #500-26-039293-067 granted by Justice of the Peace Louis DUGUAY on April 12th, 2006, in Montreal. The Warrant authorized the search at 4162 Van Horne Avenue, Montreal. Investigators executed the Warrant to search on April 12th, 2006. **(23.6) (Appendix 3 - Schedule B)**
 68. Warrant to search #500-26-039303-064 granted by Justice of the Peace Louis DUGUAY on April 13th, 2006, in Montreal. The Warrant authorized the search of a residence located at 7720 Pie-IX Boulevard, unit 1, Montreal. Investigators executed the Warrant to search on April 13th, 2006. **(23.7) (Appendix 3 - Schedule C)**
 69. Warrant to search #500-26-039302-066 granted by Justice of the Peace Louis DUGUAY on April 13th, 2006, in Montreal. The Warrant authorized the search of the residence of THURAIRATNAM, located [REDACTED]. Investigators executed the Warrant to search on April 13th, 2006. **(23.8) (Appendix 3 - Schedule D)**
 70. Production Order #500-26-043253-073 granted by Justice of the Peace Gilles MICHAUD on February 21st, 2007, in Montreal. The Order permitted to obtain the banking records of the WTM TD bank account #4336-0928569 from the TD Canada Trust for the period of December 2005 to February 2007. **(23.9)**
 71. Production Order #500-26-043255-078 granted by Justice of the Peace Gilles MICHAUD on February 21st, 2007, in Montreal. The Order permitted to obtain of the banking records of account #06301-8230864 held by CHANDRASEGARAM at the Royal Bank of Canada for the period of December 2004 to February 2007. **(23.10)**
 72. Production Order #500-26-044728-073 granted by Justice of the Peace Suzanne BOUSQUET on May 23rd, 2007. The Order permitted to obtain the banking records of CHANDRASEGARAM from the TD Canada Trust Bank for the period of April 2005 to May 2007. The TD bank account held by CHANDRASEGARAM is #359-6270618. **(23.11)**
 73. Production Order #500-26-047522-085 granted by Justice of the Peace Louis DUGUAY on January 4th, 2008. The Order permitted to obtain the banking records for the joint bank account and the mortgage held by CHANDRASEGARAM and SIVARAMAN at the Bank of Nova Scotia, for the period of June 16th, 1999, to December 31st, 2007. CHANDRASEGARAM and SIVARAMAN have two accounts at the Bank of Nova Scotia:

- (1) the checking account #80291-01162-89 and (2) the Mortgage account #583-636-6. (23.12)
74. Production Order #500-26-048605-087 granted by Justice of the Peace Gilles MICHAUD on March 14th, 2008, in Montreal. The Order permitted the obtainment of the banking records of the WTM TD bank account #4336-0928569 from the TD Canada Trust for the period of February 17th, 2007, to February 14th, 2008. (23.17)
 75. Special Search Warrant #DES-9-08 to seize property granted by the Honourable Mr. Justice François Lemieux, Judge of the Federal Court, on April 10th, 2008. The Warrant authorized to seize the properties located at the RCMP Headquarters at 4225 Dorchester Boulevard., Westmount, Quebec, Canada. This Warrant was executed on April 11th, 2008, in respect of the properties previously seized on April 12th, and April 13th, 2006, with: Warrant to search #500-26-039292-069; Warrant to search #500-26-039293-067; Warrant to search #500-26-039303-064; and Warrant to search #500-26-039302-066. (23.13)
 76. Order #DES-9-08 to restrain and manage property granted by the Honourable Mr. Justice François Lemieux, Judge of the Federal Court, on April 10th, 2008. The Order authorized the restraint of the building bearing civic numbers 4160 and 4162 Van Horne Avenue, Montreal, Province of Quebec. (23.14)
 77. Order #DES-9-08 to restrain and manage property granted by the Honourable Mr. Justice François Lemieux, Judge of the Federal Court, on April 10th, 2008. The Order authorized the restraint of the contents of the Commercial bank account #4336-0928569 in the name of the World Tamil Movement of Quebec located at the T.D. Canada Trust Bank, 8200 Decarie Boulevard, Montreal, Province of Quebec. (23.15)
 78. Special Search Warrant #T-1269-08 granted by the Honourable Justice François Lemieux, Judge of the Federal Court, on August 22nd, 2008. The Warrant authorizes the search and seizure of the properties located 4160 and 4162 Van Horne Avenue, Montreal, Province of Quebec. This Warrant was executed on September 3rd, 2008. (23.18) (Appendix 3 - Schedule E)
 79. Order for continuation in force of restraint Orders and further detention of items seized, dockets DES-9-08 and DES-8-08 granted by the Honourable Justice François Lemieux, Judge of the Federal Court, on October 29th, 2008. (23.16)

PART II

4 OVERVIEW

80. The LTTE is a terrorist group that advocates the separation of the northern and eastern regions from Sri Lanka. A cease-fire established in February 2002 put an end to overt fighting in Sri Lanka. However in 2003, the LTTE withdrew from peace negotiations. In Canada, the WTM is the main front organization for the LTTE and has organized branches in Toronto and Montreal. The WTM is an integral part of the LTTE strategy to raise funds for rearmament and to gain legitimacy as the sole representative of the Tamil

people in the international community. Through the WTM, the leadership of the LTTE is influencing events within the Tamil Canadian community and exerting control over their activities.

81. In 2003, the Montreal INSET started an investigation on the activities of members of the WTM and their associates, a group suspected of conducting numerous activities, that I believe are used to support the LTTE. The LTTE operates in Quebec through the WTM, a front organization having its head office at 4160 Van Horne Avenue, Montreal. The WTM is comprised of a number of sub-organizations, one of which is the Eelam Tamil Association of Quebec ("ETAQ"), at 4162 Van Horne Avenue, Montreal. The owners of the building, SIVARAMAN and CHANDRASEGARAM, are linked to the WTM. In this Affidavit, I will demonstrate that the WTM's main purpose is to finance the LTTE and conduct propaganda campaigns for that organization which is an offence of facilitating terrorist activities and therefore makes the WTM a terrorist group. Moreover, I will establish the direct link between the LTTE and the WTM through the items seized during this investigation. I will show that the items seized belong to or are controlled by or on behalf of terrorist groups, namely the WTM and the LTTE. I will also demonstrate that the WTM conducts its activities as per the directives of the LTTE. I will present how the owners of 4160 and 4162 are active participants in the activities of the LTTE through the WTM using the building at 4160 and 4162 Van Horne Avenue, Montreal. Finally, I will show how the WTM used their TD bank account to finance the LTTE.

5 GROUNDS FOR BELIEF

82. I believe on reasonable grounds that property is owned or controlled by a terrorist group, the WTM, on behalf of a terrorist group, the LTTE, pursuant to paragraph 83.14 (1)(a) of the *Criminal Code*.
83. My grounds for believing that an Order for Forfeiture of Property may be made under Subsection 83.14(5) of the *Criminal Code* in respect of the Properties can be summarized as follows (The grounds for this belief are detailed later in this Affidavit):
- In Canada, the LTTE has been listed as a terrorist group since April 8th, 2006;
 - Prior to April 8th, 2006, the activities of the LTTE in Sri Lanka were considered terrorism, as per the definitions of "terrorist group" and "terrorist activity" under subsection 83.01(1) of the *Criminal Code*;
 - Prior to the Anti Terrorism Act which came in effect on December 18th, 2001, the activities of the LTTE were condemned by the international community as terrorism, which led to the LTTE becoming a listed terrorist entity in many countries including the United States (1997) and the United Kingdom (2000);
 - The WTM is a foreign branch of the LTTE in Canada that has been utilizing their property located at 4160 and 4162 Van Horne Avenue, Montreal for the purpose of facilitating the LTTE's cause;
 - In Canada, the WTM has been listed as a terrorist group since June 13th, 2008;

- ✓ The members of WTM are structured and operate as per written directives dictated by the LTTE;
- ✓ The WTM's main activities are to raise funds and conduct propaganda campaigns in support of the LTTE;
- ✓ In 2003, the LTTE issued a document called the "Re-organization of Foreign Branches of the Liberation Tigers of Tamil Eelam" in which they dictate precisely how they want their foreign branches to be structured and operated. The Quebec branch of the WTM has been structured and operates as per the above-noted document;
- ✓ The LTTE dispenses training sessions in Sri Lanka to their foreign activists. Some members of the WTM have received the LTTE training for foreign activists. The LTTE issued a certificate to the participants of the foreign activist training, and that same was brought back to Canada by some of the WTM members;
- ✓ CHANDRASEGARAM is a member of the WTM and the co-owner of 4160 and 4162 Van Horne Avenue, Montreal. CHANDRASEGARAM is also listed as one of the 36 activists of the WTM;
- ✓ SIVARAMAN is the co-owner of 4160 and 4162 Van Horne Avenue, Montreal, and is listed as the administrator of the Eelam Tamil Association of Quebec ("ETAQ"), which is a sub-organization of the WTM, registered to 4162 Van Horne Avenue, Montreal;
- ✓ The building located at 4160 and 4162 Van Horne Avenue, Montreal, is controlled by a terrorist group, the WTM, on behalf of a terrorist group, the LTTE;
- ✓ The WTM TD bank account #4336-0928569 held at the TD Canada Trust is owned by a terrorist group, the WTM, on behalf of a terrorist group, the LTTE;
- ✓ The WTM TD bank account #4336-0928569 held at the TD Canada Trust has been used to generate funds through a pre-authorized debit system, funds that are ultimately sent to the LTTE;
- ✓ The exhibit items seized at 4160-4162 Van Horne Avenue, Montreal, at 7720 Pie-IX, unit 1, Montreal, [REDACTED] and at the recycling bin located at 6925 Chemin Côte-des-Neiges, Montreal, are used throughout this Affidavit to demonstrate that the WTM is used as a branch by the LTTE to finance terrorism;
- ✓ The exhibit items seized at 4160-4162 Van Horne Avenue, Montreal, at 7720 Pie-IX, unit 1, Montreal, [REDACTED] and at the recycling bin located at 6925 Chemin Côte-des-Neiges, Montreal are property owned by a terrorist group, the WTM, on behalf of a terrorist group, the LTTE.

6 LIBERATION TIGERS OF TAMIL EELAM (LTTE)

6.1 History of Sri-Lanka and the conflict between its people

84. SRI LANKA, birthplace of the LTTE, was known as Ceylon until 1972. Sri Lanka, a parliamentary democracy, is an island country located 50 kilometres off the southeast tip of India, in South Asia. Its population, estimated at 19.5 million, consists of a Sinhalese majority of Buddhist religion (approximately 70% of the population of Sri Lanka) in the southern part of the country and a Tamil minority of Hindu religion (approximately 18% of the population), living mainly in the northern and north-eastern part of the island. Christian (about 4%) and Muslim (about 8%) Sinhalese communities are also represented in Sri Lanka.

This information was obtained from Le Petit Larousse (2.2), the Encyclopaedia Universalis (3.2) and the Encyclopaedia Britannica. (4.2)

85. On February 4th, 1948, Ceylon became independent. With the island no longer under the control of Great Britain, the Sinhalese majority got organized and attempted to gain more power to the detriment of the Tamil minority. In the 1950's, a surge of Sinhalese nationalism led to the adoption of measures that were very unpopular among the Tamil population. Two of these measures had a particularly negative impact on the reconciliation of Tamil and Sinhalese communities. In 1956, the Sinhala Only Act was passed, which made Sinhalese the only official language of Ceylon. This legislation was the target of strong criticism by the Tamils, who considered it discriminatory. The resulting turmoil culminated in riots between the Sinhalese and Tamil communities. Later, in 1970, changes to the admission process in universities were also devastating. These changes put Tamil students at a disadvantage as they had to score higher marks than Sinhalese students to gain admission to the same university programs. This climate of social turmoil has given rise to Tamil - mostly student - contestation movements that have resulted in confrontation and acts of violence in Sri Lanka since the mid 1970's. On the other hand, the enactment of policy to relax and alleviate the repercussions of these measures on the Tamil minority has failed to eliminate the dissatisfaction of the Tamil population.

This information was obtained from the Encyclopaedia Britannica (4.2) and an article by Mr. K.M. De SILVA entitled "To restore Peace to Sri Lanka's Fractured Polity". (20.2)

6.2 Definition of TAMIL EELAM

86. "Tamil Eelam is a *de facto* state in the Indian Ocean. It is located below the Tamil Nadu state of India and in the North East of Sri Lanka. The state of Tamil Eelam has been established by the people living under the right self determination given by the International Covenant of Civil and Political Rights, article 1, to which Sri Lanka is a signatory."

This information was obtained from the website www.tamilcanadian.com on December 31st, 2008. (12.2)

87. The Tamil Eelam home page states that: "The Tamil people of the Island of Ceylon (now called Sri Lanka) constitute a distinct nation. They form a social entity with their own history, traditions, culture, language and traditional homeland. The Tamil people call their nation Tamil Eelam."

This information was obtained from the website www.eelam.com on December 31st, 2008. (11.1)

In general terms, Tamil Eelam is an area of Sri Lanka that is coveted by the LTTE in order to establish an independent state.

88. The area coveted by the LTTE in Sri Lanka is concentrated mostly to the east coast and in the north of the island. A map can be found on the tamilcanadian.com website. **This information was obtained from the website www.tamilcanadian.com. (12.7)**
This area shown in lighter color on the map appears on many exhibits seized or seen during surveillance operations.

6.3 Creation of the LTTE

89. Literature considers two dates as particularly important in the creation of the LTTE: 1972 and 1976. In 1972, following the announcement of a new constitution once again recognizing Sinhalese as the official language of Sri Lanka and giving precedence to Buddhism, several acts of violence and attacks were committed by Tamil insurgent groups in the Jaffna peninsula. Caught up in a revolutionary situation created by the concrete conditions of intolerable national oppression, the Tamil revolutionary youth sought desperately to create a revolutionary political organization to advance the task of national liberation. It was in this specific political conjuncture the Tiger Movement took its historical birth in 1972. The Movement was formed by its present leader and military commander Velupillai PIRABAHARAN. At the time of its inauguration the movement called itself "The Tamil New Tigers" and later on May 5th, 1976, the organization renamed itself Liberation Tigers of Tamil Eelam (LTTE). **This information was obtained on December 15th, 2008, from the website www.tamilnation.org in an article entitled LIBERATION TIGERS OF EELAM - The birth of the Tiger Movement (10.2); and the Encyclopaedia Britannica (4.2).**
90. "Founded in 1976, the LTTE is the most powerful Tamil group in Sri Lanka and uses overt and illegal methods to raise funds, acquire weapons, and publicize its cause of establishing an independent Tamil state. The LTTE began its armed conflict with the Sri Lankan Government in 1983 and has relied on a guerrilla strategy that includes the use of terrorist tactics. The Tigers have integrated a battlefield insurgent strategy with a terrorist program that targets not only key personnel in the countryside but also senior Sri Lankan political and military leaders in Colombo and other urban centers. The Tigers are most notorious for their cadre of suicide bombers, the Black Tigers. Political assassinations and bombings are commonplace. The LTTE also has a significant overseas support structure for fundraising, weapons procurement, and propaganda activities. The Tigers control most of the northern and eastern coastal areas of Sri Lanka but have conducted operations throughout the island. Headquartered in northern Sri Lanka, LTTE leader Velupillai PRABHAKARAN has established an extensive network of checkpoints and informants to keep track of any outsiders who enter the group's area of control." **This information was obtained from an annual report entitled "Patterns of Global Terrorism, 2003", published in April 2004 by the US Department of State and the Office of the Coordinator for Counter-Terrorism found on the official US Department of State website. (19.2)**

91. In the 1970's and early 1980's, the *provocation-repression cycle between Tamil and Sinhalese* authorities escalated and culminated in July 1983 with the LTTE killing of 13 soldiers in an ambush in Jaffna against the Sri Lankan army. In response to this attack, the government sent troops out across the country. As well, groups of rioters took part in the operation, burning down and looting Tamil properties and killing Tamils. This resulted in thousands of casualties within the Tamil community and triggered a massive exodus of Tamils to the West, including Canada. There were also population movements within Sri Lanka, as Tamils living in the south moved north, and the majority of Sinhalese still living in the north moved south.
This information was obtained from the Encyclopaedia Universalis (3.3); the Encyclopaedia Britannica (4.2); an article on www.britannica.com entitled Sri Lanka: the price of reconciliation (6.2); and in an article dated May 24th, 2002, on the Jane's Information Group website. (7.2).
92. Several public sources of information indicate that the LTTE has, since the late 1980's, committed close to 200 suicide bombings, in addition to resorting to other "conventional" means such as bombs and firearms. LTTE members have thus killed, in several attacks, civilians and political figures in support of their cause. These attacks do not exclusively target the Sri Lankan Government or the Sinhalese population. They also take aim at Tamils or other Tamil groups that are opposed to the LTTE.
This information was obtained from the Council on Foreign Affairs website (5.2 and 5.3) and Jane's Information Group website. (7.2)

6.4 Terrorist acts committed by the LTTE

93. On May 1st, 1987, Velupillai PRABHAKARAN, the leader of the LTTE, addressed the people of Tamil Eelam and said:

"We have to win our freedom through armed struggle and shedding of blood. There is no other easy way or alternative left for us. Either we perish as slaves or fight with arms and live as free people. This is our political fate. All of us make a firm resolve on this May Day. That is, an independent Tamil Eelam is the only solution and the ultimate solution to our problem. To secure this goal of an independent Tamil Eelam, let us all fight to the last sacrificing our lives, limbs and souls. Let this be our May Day resolve and proclamation!"

This information was obtained from page 13 of an article on PRABHAKARAN found on the www.tamilnation.org website. (10.3)

I will explain the individual known as Velupillai PRABHAKARAN later in this Affidavit.

94. The LTTE, which may have between 7000 and 15000 armed combatants, is notorious for its suicide bombings. Since the late 1980', the group has conducted approximately two hundred suicide attacks. Targets have included transit hubs, Buddhist shrines, and office buildings. According to the Federal Bureau of Investigations (FBI), the LTTE invented the suicide belt and pioneered the use of women in suicide attacks. LTTE fighters wear cyanide capsules around their necks so they can commit suicide if captured. Beyond suicide bombings, the LTTE has used conventional bombs and Claymore mines to attack political and civilian targets, and has gunned down both Sri Lankan officials and civilians. In an April 2008 report, the U.S. State Department also

accuses the LTTE of engaging in abductions and extortion. Many of the victims have been public officials. Over the past twenty years, the LTTE has been accused of assassinating almost a dozen high-level figures, including two heads of state. Assassinations and attacks on officials committed by LTTE include:

- The May 1991 assassination of former Indian Prime Minister Rajiv Gandhi at a campaign rally in India;
- The May 1993 assassination of Sri Lankan President Ranasinghe Premadasa;
- The July 1999 assassination of a Sri Lankan member of parliament, Neelan Thiruchelvam, an ethnic Tamil involved in a government-sponsored peace initiative;
- A pair of December 1999 suicide bombings in Colombo that wounded Sri Lankan President Chandrika Kumaratunga;
- The June 2000 assassination of Sri Lankan Industry Minister C.V. Goonaratne;
- The August 2005 assassination of Foreign Minister Lakshman Kadirgamar;
- The January 2008 assassination of a member of parliament from the opposition United National Party (UNP), T. Maheswaran;
- The January 2008 assassination of Sri Lankan Nation-Building Minister D. M. Dassanayake;
- The February 2008 assassination of two cadres of the political party and paramilitary group Tamil Makkal Viduthala Pulikal (TMVP);
- And the April 2008 assassination of Sri Lankan Highway Minister Jeyaraj Fernandopulle.

This information was obtained from the Council on Foreign Affairs website (5.2 and 5.3); the encyclopaedia Universalis (3.3); the New encyclopaedia Britannica (4.2); Jane's Information Group website(7.2); an article by Yoran SCHWEITZER entitled "Suicide Terrorism: Development & Characteristics" dated 2000-04-24(22.2); and the BBC news website(8.2).

95. On October 15th, 1997, Tamil Tiger guerrillas exploded a truck bomb and fought street battles with security forces in the heart of Sri Lanka's capital, Colombo. At least 12 people were killed and more than 100 were injured. The attack was aimed at the new World Trade Centre building that houses the Colombo Stock Exchange, the Central Bank and several foreign companies.
This information was obtained from the BBC website (8.3); CNN World News online (9.2); and Jane's Information Group website (7.2); and the U.S. Department of State website, "Background Note: Sri Lanka" (19.3).
96. On January 26th, 1998, in a message addressed to LTTE representatives, Amnesty International denounced a bomb attack committed by the LTTE. The Amnesty International press office reported that three LTTE members had driven a truck carrying

explosives up to a temple in Kandy, where they blew it up, killing 10 people, including 2 infants and 5 members of the same family. Several more were wounded.

This information was obtained from the Amnesty International news service (25.2); CNN World News on-line (9.3); and Jane's Information Group website. (7.2)

97. On September 20th, 1999, the Amnesty International press office reported the massacre of hundreds of civilians by the LTTE in north-eastern regions home to Muslim and Sinhalese communities. Amnesty International condemned the deliberate attack against civilians that killed over 50 people in three villages in the Amparai District.
This information was obtained from the Amnesty International news service website. (25.3)
98. On June 7th, 2000, in Ratmalana, Sri Lanka, Mr. C.V. GOONERATNAM, at the time Sri Lanka's Minister of Industry, was killed along with 20 civilians as a result of a suicide bombing allegedly committed by the LTTE. The attack was condemned by Amnesty International, the United Nations and the United States the same day.
This information was obtained from the BBC on-line news service (8.4); Amnesty International news service (25.4)
99. On July 24th, 2001, the LTTE targeted the International Airport of Sri Lanka in Colombo and a nearby air force base, killing approximately 15 people and causing considerable material damage. Five aircraft belonging to Sri Lanka's national airline were damaged, and approximately 8 military aircraft were destroyed, as hundreds of terrified tourists and employees ran for shelter.
This information was obtained from the BBC on-line news service (8.5); CNN World News on-line (9.4); and the Guardian Unlimited on-line newspaper (18.2).
100. On August 7th, 2003, Amnesty International and Human Rights Watch issued a joint news release stating that despite a cease-fire declared on February 23rd, 2002, between the Government of Sri Lanka and the LTTE, the latter continued to kill and attack individuals associated with Tamil political parties who oppose the LTTE. The two humanitarian agencies indicated that at least 22 people with ties to political parties who oppose the LTTE had been killed in politically-motivated attacks since the cease-fire had been signed by the Sri Lankan Government and the LTTE. Many other people were believed to have been the targets of attempted murders or kidnapping, and their fate remains unknown. In several of these incidents, witnesses apparently identified the perpetrators as members of the LTTE. Amnesty International and Human Rights Watch hold the LTTE responsible for these killings and kidnappings, carried out in violation of the cease-fire.
This information was obtained from the Amnesty International (25.5) and Human Rights Watch websites. (26.2)
101. In a 2004 report entitled "Patterns of Global Terrorism, 2003" published by the Office of the Coordinator for Counter-Terrorism, the United States Department of State indicates the following:

"Sri Lanka continues to support our global efforts to combat terrorism as well as undertaking their own efforts to combat terrorism domestically. Sri Lanka has actively supported international regimes to combat terrorist financing as well. There were no incidents of international terrorism in Sri

Lanka in 2003, as the cease-fire signed between the Government of Sri Lanka and the LTTE held, despite a halt in face-to-face negotiations and a serious political crisis within the Sri Lankan Government. There were no LTTE suicide bomb attacks throughout 2003, and the group continues to pursue ways to further peace talks. The LTTE has publicly accepted the concept of internal autonomy within a federal Sri Lankan state, conceding its longstanding demand for a separate Tamil Eelam State. In support of the peace process, the US Government has made limited, working-level contact with LTTE authorities to facilitate delivery of humanitarian aid. Despite this progress, the LTTE, one of the world's deadliest terror groups, did not renounce terrorism or disband its "Black Tiger" suicide squads. It continues to smuggle weaponry into Sri Lanka and to forcibly recruit children into its ranks. It is too early to tell whether the Sri Lankan peace process will ultimately bear fruit or whether the LTTE will actually reform itself. Although guarded optimism continued to surround the peace process, the United States will maintain the designation of the LTTE as a Foreign Terrorist Organization until it unequivocally renounces terrorism in both word and deed."

This information was obtained from the annual report entitled "Patterns of Global Terrorism, 2003", South Asia overview section, published in April 2004 by the US Department of State and the Office of the Coordinator for Counter-Terrorism, as posted on the US Department of State website. (19.4)

The LTTE has been a listed terrorist entity in the United States since 1997.

102. On July 7th, 2004, five police officers were reported dead and eleven more people injured from a bomb explosion that occurred inside the Colpetty police station. Among these injured people were police personnel and civilian members. The bomb exploded at the Colpetty police station, after the police attempted to check a woman who was loitering in front of the office of Minister Douglas DEVANANDA, which is situated near the police station. The police brought the woman back to the Colpetty police station to further investigate and question the woman regarding her whereabouts. At the police station, the woman blew herself up.
This information was obtained from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka". (27.2)
103. On April 25th, 2006, there was a suicide bomb attack on the headquarters of the Sri Lankan army in the capital of Colombo, Sri Lanka. Many people were injured, including the head of the army, Sarath FONSEKA. "A suicide bomb went off near the army hospital aimed at the army commander's vehicle," an army spokesman told Reuters news agency reports. He added that the attacker was a woman. Tamil Tiger rebels frequently use suicide bombers in their operations. Since the Tigers pulled out of the peace talks, there has been an increase in violence in Sri Lanka.
This information was obtained from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka" (27.2); and the BBC news website. (8.2)
104. On December 1st, 2006, a suicide bomber attacked the convoy of the Sri Lankan Defence Secretary and brother to the President, Gothabaya RAJAPAKSA, wounding 14 people, police said. RAJAPAKSA escaped unhurt. RAJAPAKSA was heading to a

meeting of the National Security Council when it's believed the bomber, traveling in a taxi, pulled up alongside the convoy and detonated, setting fire to a number of vehicles. According to police, Sri Lankan forces have stepped up security in the entire area and reportedly exchanged gunfire with suspected Tamil Tiger rebels. The attack comes just three days after Tamil Tiger rebel leader Velupillai PRABHAKARAN declared that a nearly five-year-old ceasefire was now defunct. In his annual "Maveerar (Great Heroes) Day" address which coincided with his 52nd birthday, he said the cease-fire has been buried by the RAJAPAKSA administration.

This information was obtained from the CNN World News on-line (9.5); and from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka". (27.2)

105. On January 28th, 2007, a disabled female LTTE suicide bomber, targeting Eelam People's Democratic Party (EPDP) leader and Social Services Minister Douglas DEVANANDA, blew herself up when her attempt to assassinate the Minister was foiled. The woman blew herself near the Ministry's Public Relations Office at Narahenpita around 8:05am, killing the Public Relations Officer and injuring two other Ministerial Security Guards.
This information was obtained from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka". (27.2)
106. On May 16th, 2008, ten people were killed and more than 90 wounded when a Tamil Tiger suicide bomber rammed a motorcycle into a police riot squad vehicle in Sri Lanka's capital, police and army sources said. Most of the victims are members of the riot squad. Eight police officers were among those killed. The attack happened less than 100 meters (110 yards) from the presidential secretariat in Colombo on Friday morning. President Mahinda RAJAPAKSA condemned the bombing as an "act of wanton savagery" and expressed his condolences to the victims' families. "Repeated savagery of this order underlines and reiterates the need for concerted action by all those who cherish democracy, human rights and the values of civilized society, to eradicate the menace of terrorism of which the LTTE remains the bloodiest example today," RAJAPAKSA said, referring to the abbreviation for the Tamil Tigers' official name. The riot squad members were part of intensified security preparations for the swearing-in of the chief minister for the Eastern Provisional Council.
This information was obtained from the CNN World News on-line (9.5); and from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka". (27.2)

6.5 Leader of LTTE: Velupillai PRABHAKARAN (Pirabakaran)

107. I have read several documents on Internet in regards to PRABHAKARAN. In the following paragraphs, I have summarized the information referring to PRABHAKARAN as follows:
- PRABHAKARAN was born on November 26th, 1954;

- ✓ PRABHAKARAN was the leader and military commander of the "New Tamils Tigers" who later changed its name to the LTTE on May 5th, 1976. PRABHAKARAN is still the leader of the LTTE;
- ✓ PRABHAKARAN is responsible for planning, executing and leading the murder of the mayor of Jaffna, the late Alfred DURAIAPPAH, who was shot dead on July 17th, 1975;
- ✓ On July 23rd, 1983, an assault group consisting of 14 Tigers, including PRABHAKARAN, organized an ambush at Palaly road in Thirunelveli, Sri Lanka. The assault group's command was given by Lieut. SELLAKKILI on behalf of PRABHAKARAN. When the army convoy arrived at the exact spot, Tigers commenced the attack by activating the land mines. Thirteen Sinhalese soldiers were killed in the attack and weapons were confiscated by the Tigers. PRABHAKARAN alone shot and killed 7 soldiers in this attack;
- ✓ On November 27th, 1989, PRABHAKARAN proclaimed "November 27" as the "National Heroes Day". That day will be the day to commemorate the fighters who attained martyrdom for the cause of the Tamil Eelam;
The importance of the National Heroes Day will further be explained in this Affidavit, as well as the recent National Heroes Day celebrated in Montreal on December 1st, 2007 and 2008.
- ✓ PRABHAKARAN has also been accused by India of playing a key role in the murder of former Prime Minister, Rajiv GHANDI in 1991. Mr. GHANDI was killed by a suicide bomber who, the Indians believe, was acting on orders from PRABHAKARAN;
- ✓ On the Interpol website, there is presently an international warrant issued by Sri Lanka and India for PRABHAKARAN's arrest.
This information comes from the BBC website, the author being South Asia analyst Alastair LAWSON (8.6); the Interpol website (28.2); and in an article published by WTM on the www.tamilnation.org website. (10.3)

6.6 Anton BALASINGHAM

108. Officially known as the group's political adviser and theoretician, for over 25 years he played a unique role in the political struggle of Sri Lanka's Tamil minority. Over the years, this normally reticent man was the public face of the Tamil Tigers. Living in London, it was his job to communicate with the outside world about the aspirations of his people. BALASINGHAM represented the Tigers in many of these talks as the chief negotiator. He accompanied PRABHAKARAN at almost every meeting held with Indian and Sri Lankan political leaders, where he played a double role as interpreter and as adviser to the reclusive supreme Tiger. BALASINGHAM passed away on December 14th, 2006 at age 68.
This information comes from the BBC website (8.7); and the www.tamilnet.com website. (13.2)
Many of the items seized by investigators have the photo of BALASINGHAM.

6.7 The LTTE FLAG

109. "The flag of the LTTE is red and has a jumping, roaring tiger in its centre. The tiger is surrounded with a round of ammunition and two bayonets. The LTTE has chosen to use a flag as its emblem to stress that it regards its organization to be representing a nation, Tamil Eelam. The flag was adopted as the national flag of Tamil Eelam on the Second National Heroes Day, dated November 27th, 1990. The tiger was drawn in 1977 by NADARAJAN, a friend of the current LTTE leader, PRABHAKARAN. PRABHAKARAN is often pictured beside images of tigers, which shows that the tiger is of great symbolic importance to the LTTE. The tiger symbolises aggression, which LTTE emphasizes further by using a jumping, roaring animal. The ammunition and bayonets show that the LTTE's fight for an independent Tamil State is armed. On its website, LTTE justifies the use of force by arguing that it is the only way by which it can reach its goal when it is up against a stronger opponent, namely the Sri Lankan Government. "
This information was obtained from my review of a photograph depicting the LTTE flag and from "A picture speaks a thousand words: An analysis of terrorist emblems" by Irene Lee RASMUSSEN of the University of St-Andrews, in Scotland. (10.4)

6.8 A listed entity in Canada

110. The listing of an entity is a very public means of identifying a group or individual as being associated with terrorism. The definition of an entity includes a person, group, trust, partnership or fund, or an unincorporated association or organization. The Anti-Terrorism Act provides measures for the Government of Canada to create a list of entities. It is not a crime to be listed. However, one of the consequences of being listed is that the entity's property can be more easily the subject of seizure/restraint and/or forfeiture.
This information is from the public safety Canada website (29.2)
111. On April 8th, 2006, the organization known as the LTTE was added to the List of entities by the Canadian Government. The LTTE is now officially a listed terrorist group in Canada as it falls under the parameters of subsection 83.05(1) of the *Criminal Code* as "the Governor in Council is satisfied that there are reasonable grounds to believe that (a) the entity has knowingly carried out, attempted to carry out, participated in or facilitated a terrorist activity; or (b) the entity is knowingly acting on behalf of, at the direction of or in association with an entity referred to in paragraph (a)".
This information was obtained from the publication of the above noted amendment to the *Criminal Code* found in the Canada Gazette Extra Volume 140. No.3 dated Tuesday, April 11th, 2006. (30.2)
112. On December 10th, 2008, Her Excellency the Governor General in Council accepted the recommendation of the Minister of Public Safety and Emergency Preparedness made pursuant to subsection 83.05(9) of the *Criminal Code* that each entity listed as of July 23rd, 2008, in the Regulations Establishing a List of Entities remain a listed entity.
This information was obtained from the Regulations Establishing a List of Entities to the *Criminal Code* found in the Canada Gazette, Volume 142, No. 25 , December 10th, 2008. (30.3)

6.9 Outside Canada: Proscription of the LTTE as a terrorist group

113. At least 32 countries have listed the LTTE as a terrorist organization. As of January 2009, these include:

India (since 1992);
The United States of America (since 1997);
The United Kingdom (since 2000);
The European Union (since 2006, representing 27 countries);
Malaysia (2006);
Australia (2006);
Canada (since 2006).

This information was obtained from the report of RCMP analyst Sophie POIRIER dated March 10th, 2009. (82)

6.10 The International Secretariat

114. The LTTE has created a department they call the International Secretariat which essentially has the responsibility for ensuring the smooth running of the LTTE global network and to generate maximum financial resources to support the LTTE's war in Sri Lanka. One of its roles is to oversee activities of the LTTE Foreign Branches that have been established in a number of countries around the world, namely in Canada, France, United States, England, Germany, Italy, Norway, Australia, Switzerland, Holland, Denmark, and Malaysia. The Foreign Branches have to operate as per specific directives and guidelines established by the International Secretariat, and they must report all of their activities to them. The International Secretariat also provides training in Sri Lanka for activists working at the Foreign Branches. Some of the LTTE activists in Canada have participated in those seminars.

This information was obtained from the "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam" seized at 7720 Pie IX Boulevard, Unit 1, Montreal (32); an article by Mr. Ajit Kumar SINGH entitled "Targeting LTTE's global network" dated April 24th, 2008 (35); and a 1999 commentary by Peter CHALK found on the CSIS website.(1)

Mr. Ajit Kumar SINGH is Research Assistant at the Institute for Conflict Management in India. (17.2)

Peter CHALK (Ph.D. in Political Science, University of British Columbia, Canada) is a RAND Corporation policy analyst who has analyzed such topics as unconventional security threats in Southeast and South Asia. RAND Corporation is a non-profit institution that addresses the challenges facing public and private sectors around the world. (17.1)

115. In an article published on March 18th, 2001, on the India Tribune website (www.tribuneindia.com) entitled "LTTE shifts HQ from London to Wannai", a clear link between the LTTE and the International Secretariat is indicated:

"The Liberation Tiger of Tamil Eelam (LTTE) has relocated its international secretariat based in London to an undisclosed destination in

Wanni in Sri Lanka. Media reports here said Norwegian peace envoy Erik Solheim, who will return to Colombo within the next few days, will meet Tiger leader Velupillai PRABHAKARAN at the new office shortly. However, there is no official confirmation about Mr. Solheim's meeting with PRABHAKARAN. Political and diplomatic sources said the British ban on the LTTE would not affect the current peace process. With the LTTE shifting its international headquarters from London to Wanni, Mr. Solheim will prefer to hold talks with the LTTE leadership in Wanni, reports said. Although there was speculation about the LTTE shifting its international headquarters to another Western country, the LTTE hierarchy preferred to relocate it to the Wanni permanently rather than seek temporary accommodation elsewhere. The secretariat in London was primarily responsible for disseminating information, generating propaganda and coordinating the activities of the LTTE in 55 countries. It had no role in the LTTE's decision-making process and functioned merely as an agency."

This information was obtained from an article published on March 18th, 2001, on the India Tribune website (www.tribuneindia.com) entitled LTTE shifts HQ from London to Wanni. (34.2)

Wanni or Vanni is an area in Sri Lanka that is controlled by the LTTE. According to K. M. de Silva, in his History of Sri Lanka (published 1981), the Vanni is the land between Jaffna and Anuradhapura. (16.2)

116. In an article published on September 16th, 2006, on the website www.asiantribune.com, Veerkathi MANIVANNAN is identified as the head of the LTTE International Secretariat. The article also mentions that he is known as "Castro". An article published on November 27th, 2004, on the website www.tamilnet.com, identified V. MANIVANNAN as the Secretary of the LTTE International Secretariat. **This information was obtained from investigative assistant Ms. Catherine BERNARD ("Ms. BERNARD"), as referred to in her report dated November 22nd, 2006. (36)**
117. In a letter addressed to V. MANIVANNAN from CHANDRASEGARAM, the heading described V. MANIVANNAN as follows:
- "Mr. V. Manivannan, Responsible person, International Secretariat, The Liberation Tigers of Tamil Eelam, Tamil Eelam".
- This information was obtained from the report on the Student Association of World Tamil Movement's 15th annual athletic meets - 2005, seized at 4162 Van Horne Avenue on April 12th, 2006. Exhibit 2006-12, Item 01, binder 27/28. (37.3)**
- This letter shows a direct link between V. MANIVANNAN, the International Secretariat and the LTTE. It is also an example of correspondence between WTM and LTTE.*
118. In that same letter, CHANDRASEGARAM indicates the following:
- "Mr. SITHAMPARANATHAN (Iyyah), the leader of the World Tamil Movement, hoisted the Canadian flag;
 - Mr. KUMAR hoisted the Quebec regional flag;
 - The Tamil Eelam flag was hoisted by the mother of a hero and the grandmother of two heroes;
 - The Montreal city flag was hoisted by Mrs. SIVAMALAR, the President of the

Quebec women association of World Tamil Women Association."
This information was obtained from the report on the Student Association of World Tamil Movement's 15th annual athletic meets - 2005, seized at 4162 Van Horne Avenue on April 12th, 2006. Exhibit 2006-12, item 01, 27/28 (37.3)
I believe Mr. KUMAR to be Sebastiampillai THOMAS, a WTM administrator.

119. On April 12th, 2006, members of INSET executed a Search Warrant at 4162 Van Horne Avenue, Montreal and on April 13th, 2006, another Search Warrant at 7720 Pie-IX Boulevard, unit 1, Montreal. At both these addresses, investigators located a document titled The Workshop for the Foreign Activists from July 20th, 2004 to July 30th, 2004 ("The Workshop for the Foreign Activists"). This document contains an introduction letter from the International Secretariat on LTTE letterhead. This letter is signed by V. MANIVANNAN. In the letter it is indicated that "in order to pursue a new speed among the Tamil people, with the collaboration of the activists, to insert the notes of the participants of the seminar, the position and expectations of the Liberation Tigers of Tamil Eelam." A copy of the letter is shown below.

Logo
Liberation Tigers of
Tamil Eelam

**INTERNATIONAL COORDINATION SECRETARIAT
LIBERATION TIGERS OF TAMIL EELAM
TAMIL EELAM**

13.08.04

TO THE ATTENTION OF ALL RESPONSIBLE PERSON OF THE BRANCHES:

Dearest,

We forward herewith the summary of the discussions shared by the teachers and by the commanders during the foreign activists' seminar, held from 20. 07. 2004 until 30. 07. 2004 in Tamil Eelam.

Even though, we are unable to provide the full texts of the seminar, we hope that, these few lines will help you to understand better of the new search.

Therefore, we request that in order to pursue a new speed among the Tamil people, with the collaboration of the activists, to insert the notes of the participants of the seminar, the position and expectations of the Liberation Tigers of Tamil Eelam.

Thanks.

The desire of the Tigers is Tamil Eelam

With regards,

Signature: V.Manivannan
(V.MANIVANNAN)

This information was obtained from the document The Workshop for the Foreign Activists seized at 4162 Van Horne Avenue exhibit 2006-12, item 01, binder 2/28; and exhibit 2006-20, item 2.10, seized at 7720 Pie-IX Boulevard, unit 1, Montreal. (33)

The Search Warrant executed at 7720 Pie IX, unit 1, will be explained later in this Affidavit, in the section titled "Surveillance on WTM members following the listing of the LTTE as a terrorist group". I believe that this letter shows a direct link between the International Secretariat, The Workshop for the Foreign Activists and the LTTE.

6.11 Foreign Branches

120. In order to survive as an organization and achieve its ultimate goal of a separate state, the LTTE relies heavily on the monetary contributions of the Tamil diasporas established in different countries around the world. In order to do so, the LTTE has created sub-organizations that operate in each of those countries. The LTTE calls it a Foreign Branch. The LTTE has defined four specific areas of activities that has to be established, executed, and controlled by the Foreign Branches; (1) Propaganda and Media, (2) fundraising from the public, (3) activities of auxiliary organizations, (4) and Tamil's welfare associations. Each of those areas of activities is sub-divided into specific duties and roles that must be executed by members of a Foreign Branch. The involvement of the Foreign Branch into those areas of activities assures the LTTE a reach into any facet of the life of an expatriated Tamil in his country of adoption. **This information was obtained from the "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam" seized at 7720 Pie IX Boulevard, Unit 1, Montreal. (32)**
In Canada for instance, the LTTE has established a main governing body in the Toronto area that they refer to as the WTM Canada Branch. The Quebec Branch is in fact a registered organization in Quebec called the World Tamil Movement which I will explain later in this Affidavit.

6.12 The LTTE Manual of "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam"

121. In 2003, the LTTE produced a document that explains in detail the duties and activities of the foreign branches. In a booklet titled "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam", the International Secretariat of the LTTE dictates precisely what is to be accomplished by the Foreign Branches. **This information was obtained from the Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam seized on April 13th, 2006, at 7720 Pie IX Boulevard, Unit 1, Montreal. (32)**
I believe that the LTTE is a well-structured organization that has been very successful at getting financial support from the expatriated Tamils, also called Tamil diaspora, through the activities of their foreign branches, which I will show throughout this Affidavit.
122. The document was seized on April 13th, 2006, at 7720 Pie-IX Boulevard, unit 1, Montreal. Called the "Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam", it is dated July 28th, 2003. In this Affidavit, I will refer to this document as the "LTTE Operations Manual". As stated in the introduction of the «LTTE Operations Manual», this document was prepared to help the foreign branches in their organization by providing them with the appropriate steps acknowledged by the senior members and the leader of the LTTE. **This information was obtained from the Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam seized at 7720 Pie IX Boulevard, Unit 1, Montreal. (32)**
I believe that this document contains the guidelines for the foreign branches of the LTTE.

123. The introduction page of the document contains a message from the LTTE Leader PRABHAKARAN and from the Person In-charge of the International Secretariat. It also contains explanations and the purpose of the document. It reads as follows:

Introduction

"In order to add ambitious drive to the freedom of our motherland, it is inevitable that our foreign branches must function very efficiently. Currently in foreign countries, the necessity is raised to build the supreme political structure, for further improvements on the international political environment, which presently favour our side, to speed up our liberation battle by providing through propaganda campaigns in justifying and emphasizing on the actual point."

Hon. V. Pirabakaran

We have prepared a document, on reorganizing the foreign branches according to the deliberate thinking of Hon. V. Pirabakaran. In forwarding to you the final version of this document, we received the appropriate proposals from the senior members of our organization and the acknowledgement from our leader.

Based on this, in future, the work structures of foreign branches must be re-arranged. At each branch, under the person in charge, the responsible individuals must be appointed for the following tasks.

*Propaganda and Media.
Fund raising among the public.
The activities of auxiliary organizations.
The Tamils' welfare association.*

Consequently, for the above said tasks the responsible personnel also will be appointed at the International Secretariat. The individuals who will be appointed at the foreign branches for the above said tasks will contact the responsible personnel at the international Secretariat to obtain the orders and instructions of their tasks.

As mentioned in our re-organizing document, take the appropriate steps at your branch, and after that, through the person in charge of your branch, report to us with regard to your branch structure.

Thanking you.

Thirst of Tigers is Tamil Eelam motherland

*The Person In-Charge
International Secretariat
Liberation Tigers of Tamil Eelam
Tamil Eelam*

28-07-2003

This information was obtained from the Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam seized at 7720 Pie IX Boulevard, Unit 1, Montreal. (32)

I believe that Hon. V. Pirabakaran is PRABHAKARAN.

I believe the person-in-charge of the International Secretariat to be V. MANIVANNAN.

I have reviewed several reports written by members of INSET and numerous items seized by members of INSET. I observed that the WTM follows the guidelines provided by the LTTE through the LTTE Operations Manual. In this Affidavit, I will demonstrate in further details how the World Tamil Movement applies the guidelines provided by the LTTE Operations Manual.

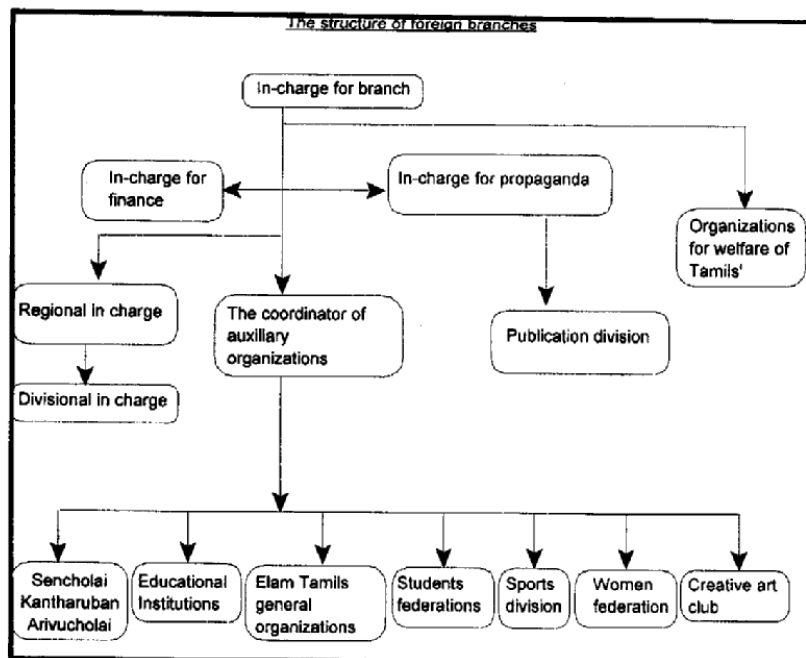
124. As previously mentioned, the LTTE Operations Manual contains the following main objectives:

- (1) Propaganda and Media;
- (2) Fundraising from the public;
- (3) Activities of sub-organizations;
- (4) Tamil's welfare associations.

This information was obtained from the Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam seized at 7720 Ple IX Boulevard, Unit 1, Montreal. (32)

These objectives and how the WTM follows them will be explained in greater details with examples of items seized later in this Affidavit.

125. At page 3 of the LTTE Operations Manual, an organizational chart is drafted. It depicts the desired structure for their foreign branches. Below is the organizational chart:



This information was obtained from the LTTE Operations Manual seized at 7720 Pie IX Boulevard, Unit 1, Montreal. (32)

6.13 The LTTE training for the Foreign Activists

126. The International Secretariat has organized training sessions (Workshop) in order to educate and motivate their foreign activists about the LTTE's battle for independence. Such sessions have taken place in 2003 and in 2004 in Sri Lanka. The title page of the booklet seized by INSET indicates the following:

**INTERNATIONAL COORDINATION CENTRE
LIBERATION TIGERS OF TAMIL EELAM
TAMIL EELAM**

**THE WORKSHOP
FOR THE FOREIGN ACTIVISTS**

**TIME
20. 07. 2004 – 30. 07. 2004**

In order to bring a new speed among the displaced countries, every one gathered together in Tamil Eelam and shared their views as a new force.....A collection of documents of The Workshop.

The desire of the Tigers is Tamil Eelam

This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
Known members of the WTM participated in the ten day training session that took place between July 20th, and July 30th, 2004. The President of the WTM, Kathiravelupillai SITHAMPARANATHAN, had the honour of raising the LTTE flag during the seminar. This will be discussed later in this Affidavit, in section 9.

127. During the training session of July of 2004, LTTE commanders, teachers, and other LTTE personalities addressed the activists. It also included a speech from the LTTE Leader PRABHAKARAN, followed by individual photo sessions taken in his company. The head of the International Secretariat, V. MANIVANNAN, provided the introductory comments to the participants by speaking of the importance for all Tamils to join together, younger generations, intellectuals, females, etc. He spoke about the individual discipline and importance to obey orders. He stressed the importance of receiving activity and financial reports from each of the countries in order that they can be submitted to the Leadership. He spoke about the views and the strength of the Leadership, the present situation of peace, and the importance of rapid actions of the displaced Tamils.
This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
128. Each speaker spoke about their specific area of responsibilities or knowledge. One of the teachers by the name of NILAVAN gave a session under the History of Tamil Eelam battle. He provided information with regards to the barbaric activities of Sinhalese. Participants then viewed a documentary exhibition on Black Tigers. In the documentary under the heading of "A voluntary gift by Black Tigers", he described the attacks of the Black Tigers amongst other things.
This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
The Black Tigers are members of the suicide squad of the LTTE.
129. Colonel SOOSAI, the Commander of the Sea Tigers, spoke about the early activities of the unit. He spoke about the Leader's vision of the future, the challenges faced in the sea, the first attack, the birth of the Sea Dove, the birth of Sea Tigers, their commitment and the participation of the people. He spoke about the insufficient activities of the branches in Canada and in England. He was expecting huge sums from the Leader, and therefore the foreign branches must take care of that and act accordingly.
This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
The Sea Tigers are members of the naval forces of the LTTE.
130. In a speech given by Colonel VITHUSA, she acknowledged the effort made by the Tamils abroad which helped in providing the LTTE with the motor shells needed in the battle fields.
This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
131. In a speech given by Colonel BHANU, he explained the attacks made by the LTTE, the weapons confiscated by the LTTE and the improvement of the motor battalion. In addition, Colonel BHANU explained the improvement of the Tiger's military during the period of Eelam War III and the remarkable contribution of the Tiger's artillery battalions. Colonel BHANU cited the greatest advances of the current situation, such as the

improved and advanced techniques of the attacks. He also requested of the Tamils abroad to replace the huge economical cost for this battalion.

This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

I believe that Eelam war III is a reference to the war period from 1995 to 2002.

I believe that Colonel BHANU makes reference to the Tamil people located overseas, such as the members of the WTM, who collect funds to pay for the LTTE military expenses.

132. S.P. THAMILCHELVAN, the Chief negotiator of the LTTE and political leader, explained the current status of the cease-fire and why they entered into it even though they believe that Tamil Eelam is the only solution.
- This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)**
- On November 2nd, 2007, the LTTE Political Division Chief THAMILCHELVAN was killed in an attack by the Sri Lanka Air force in Kilinochchi, Tiger's administrative headquarters. The killing of Mr. THAMILCHELVAN is seen by political and diplomatic observers as a major political and moral blow to the LTTE.*
- This information was obtained from an article on the website www.tamilcanadian.com dated November 4th, 2007 (12.3); and from an article on the website www.tamilnet.com dated November 2nd, 2007. (13.3)**
133. Colonel BALRAJ, a senior LTTE Commander, took the participants to a guided tour of historical locations and sacred landmarks. He described to the activists the many events that took place on the battle field. He spoke about the importance of Leadership and how lucky the entire Tamil nation was to have PRABHAKARAN as its Leader. He said that the entire Tamil community must render their fullest support to him. At the Sacred Camp, the activists had lunch on the floor with the commanders and the fighters. The participants ate the same thing as do the fighters. He described the strength of the Tigers, the requirements, and spoke of the military equipment and facilities of the Sinhalese. He insisted that in order to carry the weight of the battle, under the guidance of the Leadership, everyone must come forward.
- This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)**
134. In a speech given by Mr. V. BALAKUMARAN, he noted that the international communities of Tamil people care about the LTTE' s cause since they are involved in propaganda activities in their respective country.
- This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)**
- I believe that Mr. BALAKUMARAN refers to the foreign branches such as the WTM when he mentioned the international communities.*
135. In a speech given by Mr. VETTIYARASAN, he explained that the financial needs increased along with the improvement of the battle. While the Government of Sri Lanka receives aids from many foreign countries, the LTTE only believes in their people's

contributions for their fighting. Therefore, he pointed out to the activists that the contributions are the most important anticipated funds to the huge difference between today's peace process and the economic needs.

This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

136. In a speech given by Mr. ILANPARITHY, he stated that even though the people of the peninsula were experiencing the hardships with regards to the military activities, they had compassion towards the Liberation of the Tamil nation and supported every single move made by the Tigers.

This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

Although the exact titles or positions of BALAKUMARAN, VETTIYARASAN and ILANPARITHY are unknown, a synopsis of their speeches appears in a section of the document titled "The opinions of Commanders, person responsible, and teachers".

137. The Leader of the LTTE, PRABHAKARAN, gave a speech where he said that all Tamils must recognize that their duty was to work for motherland. He pointed out to the activists that in their approach, it was important to keep in mind to include all Tamils into the Tamil nation. He spoke of the importance of joining the expertise of different fields with the younger generation for the benefit of the motherland. He strongly suggested that everyone has to believe in the absolute victory and he explained that the younger generation that lives abroad must be taken in, for the freedom battle. Following his speech, PRABHAKARAN had discussions with each small group of activists from different countries. Activists could have their photo taken with PRABHAKARAN.

This information was obtained from the document titled The Workshop for the Foreign Activists. This document was seized at 7720 Pie IX, unit 1, Montreal. The same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

7 WORLD TAMIL MOVEMENT OF MONTREAL ("WTM") - A FOREIGN BRANCH OF THE LTTE

138. *The foreign branch of the LTTE in the Province of Quebec is operated by the WTM. A minimum of 36 activists form the structure of the WTM. Each of the activists plays a specific role in the organization. In order of importance, there is a Leader, a President, a person responsible for finances, a treasurer (office administration & accounts), a person responsible for the political section, cultural activities, publications, nine area Leaders (M1-M9), fund collectors, and newspaper delivery personnel. They seem to have a structure as it appears in several of the annual reports.*

7.1 Legal Status of the WTM - A non profit Organization

139. The WTM is an organization formed since April 21st, 1986, and registered in the province of Quebec with the Quebec Enterprise Registrar since February 1st, 1995. In its application for registration and subsequent annual reporting to the provincial

government, the WTM declared having no employees. Its operating reasons are declared as Cultural and social activities. A review of copies of the registration document and annual declarations since 1995 shows the following pertinent persons as being linked to the WTM:

- ✓ Manivannan KARUNANANTHASWAMY as the administrator;
- ✓ Kathiravelupillai SITHAMPARANATHAN as the administrator and the president;
- ✓ Muraleekaran THURAIRATNAM as the administrator and the treasurer;
- ✓ Thanasegaram CHANDRASEGARAM as a former administrator and member of committee.

This information was obtained from copies of the registration document dated February 17th, 2009, and from annual reports of the WTM for the years 1995 to 2005 and 2007. (38.3)

7.2 Listing of WTM - 2008-06-13

140. On June 13th, 2008, the organization known as the World Tamil Movement (WTM) was added to the List of terrorist entities by the Canadian Government. The WTM is now officially a listed terrorist entity in Canada as it falls under the parameters of paragraphs "a" and "b" pursuant to subsection 83.01(1) of the *Criminal Code* that reads: "a listed entity, and includes an association of such entities."
This information was obtained from the publication of the above noted amendment to the *Criminal Code* found in the Canada Gazette Extra Volume 142, No.1 dated Wednesday June 18th, 2008. (30.4)

8 SUBJECTS INVOLVED IN THIS INVESTIGATION

141. *The following two subsections constitute an overview of the most pertinent individuals involved in this investigation. Their roles and involvement will be further detailed throughout this Affidavit with supporting evidence.*

8.1 Registered owners of 4160 and 4162 Van Horne Avenue, Montreal

142. Since July 2003, members of INSET have been investigating several subjects, these subjects roles are briefly described below as their role will be further explained in this Affidavit, notably:

1. **Name:** Thanasegaram CHANDRASEGARAM alias BALAN, S. BALAN, T. BALAN, CHANDRABALAN, CHANDRAPALAN, CHANDRABALALA, CHANDRABALA, CHANDRABALAM, DANASEGARAM CHANDIRASEGARAM, ("CHANDRASEGARAM") (male)

DOB: 1972-10-20

Address: [REDACTED]

Role in this investigation:

- CHANDRASEGARAM is a member of the WTM;
- CHANDRASEGARAM was trained as an activist by the LTTE in Sri Lanka;
- CHANDRASEGARAM's name (T. BALAN) was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- CHANDRASEGARAM received his training certificate from the hands of the LTTE leader, PRABHAKARAN;
- CHANDRASEGARAM is the co-owner of 4160 and 4162 Van Horne Avenue, Montreal, since July 27th, 1999;
- CHANDRASEGARAM is a paid activist of the WTM;
Paid activists are members on the payroll for their fundraising activities.
- CHANDRASEGARAM collects funds from Tamil people in the Montreal area;
- CHANDRASEGARAM transferred funds overseas to the LTTE;
- CHANDRASEGARAM used his own personal account for WTM transfers;
- CHANDRASEGARAM reported WTM activities to the LTTE as the deputy leader of the WTM;
- CHANDRASEGARAM is the WTM "Area Chief" for zone M-7;
- CHANDRASEGARAM returned from Sri Lanka carrying 119 Pre-Authorized Payment Plan forms filled by Canadian Tamils;
- CHANDRASEGARAM participated in preparing numerous fundraising and propaganda events in support of the LTTE;
- CHANDRASEGARAM is a joint account holder for the mortgage at the Scotia Bank for the building occupied at the WTM.

2. **Name:** Sivanathan SIVARAMAN alias Sivaraman SIVANATHAN ("SIVARAMAN") (male)
- DOB:** 1958-03-31
- Address:** [REDACTED]

Role in this investigation:

- SIVARAMAN is the co-owner of the WTM building located at 4160-4162 Van Horne Avenue, Montreal;
- SIVARAMAN is a Tamil Rehabilitation Organization ("TRO") representative in Quebec;
- SIVARAMAN is an administrator of the Eelam Tamil Association of Quebec("ETAQ") registered at 4162 Van Horne Avenue, Montreal;
- SIVARAMAN participated in the preparation of the Martyr's Day celebration on December 1st, 2007;
- SIVARAMAN's phone number was printed on a publicity pamphlet for a WTM cultural event linked to the TRO;
- SIVARAMAN is a joint account holder for the mortgage at the Scotia Bank for the building occupied at the WTM;
- SIVARAMAN participated in the unveiling of the monument in front of 4160 Van Horne Avenue, Montreal, in October 2004. The LTTE flag was one of the three flags hoisted;
- SIVARAMAN participated in the construction of the WTM monument in front of 4160-4162 Van Horne.

8.2 Members of the WTM in alphabetical order

3. **Name:** Ramani **BALENDRA** (Female)

DOB: 1961-07-26

Address: [REDACTED]

Role in this investigation:

- BALENDRA is a member of the WTM;
- BALENDRA is in charge of the political section for the WTM;
- BALENDRA's name was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- BALENDRA gave a media press conference on April 26th, 2006, following the Search Warrant executed at 4160 and 4162 Van Horne Avenue, Montreal, on April 12th, 2006;

- BALENDRA expressed to the media that the WTM did not finance terrorism, she added that they gave money to the Tamil Rehabilitation Organization ("TRO") and the Social and Economical Development Organization for Tamils;
- BALENDRA is the president of the Canadian Tamil Congress in Quebec.

4. **Name:** **Manivannan KARUNANANTHASWAMY**
("KARUNANANTHASWAMY") (male)

DOB: 1976-12-12

Address: [REDACTED]

Role in this investigation:

- KARUNANANTHASWAMY is a member of the WTM;
- KARUNANANTHASWAMY is a paid activist of the WTM;
- KARUNANANTHASWAMY is also one of the administrator of the WTM;
- KARUNANANTHASWAMY gave a warned statement on April 4th, 2005, to Cpl. BOUDREAU and mentioned that he was the leader of the WTM in 2003, 2004 and part of 2005;
- KARUNANANTHASWAMY distributes newspaper on behalf of the WTM;
- KARUNANANTHASWAMY attended Black Tigers Day on July 10th, 2004;
- KARUNANANTHASWAMY is responsible for collecting the Pre-Authorized Payment Plan forms;
- KARUNANANTHASWAMY had LTTE's paraphernalia in his luggage on August 14th, 2006.

5. **Name:** **Anton MANICKAM**

DOB: 1952-05-14

Address: [REDACTED]

Role in this investigation:

- MANICKAM is a member of the WTM;
- MANICKAM was designated by the WTM as the coordinator for the Pre-Authorized Payment Plan service with the TD Canada Trust Bank;

- MANICKAM is the co-signing officer for the WTM TD bank account #4336-0928569 held at the TD Canada Trust Bank in Montreal since 1994; this is the WTM main account used in part for the pre-authorized payments and wire transfers, and the account sought to be forfeited;
- MANICKAM was listed as a administrator of the WTM and as a treasurer of the WTM from 1998 to 2004;
- MANICKAM was listed as one of the administrators for the Student Association of the World Tamil Movement ("SAWTM") located at 4160 Van Horne Avenue, Montreal, in 2004;
- MANICKAM's name was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- MANICKAM participated in the preparation of the Martyr's Day held at the "Centre d'éducation des adultes Outremont", located at 500 Dollard Street, Montreal on December 1st, 2007.

6. **Name:** Santhirakumar PERAMPALAM alias Easan, Eason, Perampalam CHANDRAKUMAR ("PERAMPALAM") (male)

DOB: 1981-05-27

Address: [REDACTED]

Role in this investigation:

- PERAMPALAM is a member of the WTM;
- PERAMPALAMAN is a trained activist of the LTTE;
- PERAMPALAM's name was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- PERAMPALAM distributes newspapers on behalf of the WTM in the Montreal area.

7. **Name:** Kathiravelupillai SITHAMPARANATHAN alias Aiyah, Iyyah(male) ("SITHAMPARANATHAN")

DOB: 1923-10-24

Address: [REDACTED]

Role in this investigation:

- SITHAMPARANATHAN is the president of the WTM;
- SITHAMPARANATHAN is a trained activist of the LTTE;
- SITHAMPARANATHAN is the co-signing officer for the WTM TD bank account #4336-0928569 held at the TD Canada Trust Bank in Montreal since 1994, the account sought to be forfeited;
- SITHAMPARANATHAN was observed sitting at a table during the Martyr's Day 2003, manipulating funds derived from tickets sale on November 29th, 2003;
- SITHAMPARANATHAN attended the LTTE training in Sri Lanka and raised the national flag on July 25th, 2004;
- SITHAMPARANATHAN's name was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- SITHAMPARANATHAN testified at a hearing on May 16th, and May 17th, 2007, for an Application for Detention of Things seized pursuant to section 490(3) of the *Criminal Code* before the Honourable Judge Louise VILLEMURE and unveiled facts, which will be explained later in this Affidavit, in regards to the WTM and the LTTE;
- SITHAMPARANATHAN was present in the preparation of the Martyr's Day held at the "Centre d'éducation des adultes Outremont", located at 500 Dollard Street, Montreal on December 1st, 2007, and participated at the event.

8. **Name:** **Muralee Karan THURAIRATNAM** alias **Murali**
("THURAIRATNAM") (male)

DOB: 1966-09-25

Address: [REDACTED]

Role in this investigation:

- THURAIRATNAM is a member of the WTM;
- THURAIRATNAM became the WTM leader in 2005;
- THURAIRATNAM is a paid activist of the WTM;
- THURAIRATNAM is listed as an administrator of the World Tamil

Movement in Quebec since 2005:

- THURAIRATNAM's name was located on the list of the 36 WTM activists which was attached to a letter dated June 18th, 2005, and addressed to the LTTE International Secretariat;
- THURAIRATNAM was seen disposing boxes which were containing LTTE and WTM material in a recycling bin in Montreal on April 11th, 2006, the same day of the public announcement of the listing of the LTTE as a terrorist group in Canada;
- THURAIRATNAM was responsible of the finance for the WTM until 2005;
- THURAIRATNAM was photographed with PRABHAKARAN and Colonel SOOSAI.

9 LTTE SEMINAR FOR THE FOREIGN ACTIVISTS IN SRI LANKA - JULY 20TH TO JULY 30TH, 2004

143. As previously mentioned, the International Secretariat of the LTTE is responsible for the training of the LTTE foreign activists, operating in Canada and elsewhere in the world. The International Secretariat organizes workshops and training sessions to educate their foreign activists located around the world. These workshops and training sessions took place in the LTTE controlled area of Sri Lanka. Several of the WTM members have attended these training sessions given by the LTTE.
This information was obtained from a review of the translated document titled The Workshop for the Foreign Activists seized at 7720 Pie IX Boulevard, Unit 1, Montreal. This same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
144. I have completed a review of the "Workshop" booklet prepared by the LTTE International Secretariat. The document is entitled The Workshop for the Foreign Activists. This booklet describes a training workshop given to LTTE foreign activists, including WTM members. The booklet includes an introduction letter from V. MANIVANNAN, the person in charge of the LTTE International Secretariat. The letter, dated August 13th, 2004, has the emblem of the LTTE on the top left corner which could be described as the letterhead of the LTTE. In this letter, addressed to the persons responsible for the branches, V. MANIVANNAN advises that he is forwarding, to each of them, a summary of the foreign activists seminar held from July 20th, 2004, to July 30th, 2004. The letter requested that the documents from The Seminar should be included with the position and expectations of the LTTE.
This information was obtained from a review of the translated document titled The Workshop for the Foreign Activists seized at 7720 Pie IX Boulevard, Unit 1, Montreal. This same document was also seized at 4162 Van Horne Avenue, Montreal. (33)
The title of V. MANIVANNAN's letter has a heading stating "International Coordination Secretariat, Liberation Tigers of Tamil Eelam, Tamil Eelam". I believe that Mr. V. MANIVANNAN is the coordinator of the International Secretariat of the LTTE. The International Secretariat was explained earlier in subsection 6.10.

145. In the booklet, The Workshop for the Foreign Activists, a document with the heading "International Secretariat, The Liberation Tigers of Tamil Eelam (LTTE)" and titled "Seminar for the Foreign Activists 20.07.2004-30.07.2004" cited that the following field events took place:

- Visit of Visuvamadu Hero's cemetery;
- Visit of a movement memorial centre at Kudarappu;
- Visit of Tamil Eelam Police Head Quarters;
- Visit of the Rehabilitation school at Kilinochchi;
- Visit of the Tamil Eelam Justice and Administration;
- Visit of Anpucholai (The Center for Elderly Care);
- Visit of Niraimathy Iliam (The Centre for Psychiatric Female Patients);
- Visit of Venpura (The Center for the Amputee);
- Visit of the Base of the Sea Tigers;
- Visit of the front border security points;
- Visit of Sencholai (The Red Park);
- Visit of Navam Arivukoodam (Navam Education Center);
Navam Education Centre will be explained in subsection 12.6.
- Visit of the head office of the Tamil Rehabilitation Center;
- Visit of a cannon battalion of Colonel KIDDU;
According to the website www.tamilnet.com, Colonel Kiddu is a former senior commander of the LTTE: an artillery corps is named after him, "The Colonel Kiddu artillery corps". (13.4)
- Visit of Uthayapedam (The Raising Podium) Punitha Poomi (The Secret Land);
- Visit of Ariviyai Nagar (The Town of Knowledge).

This information was obtained from the translation of the document titled The Workshop for the Foreign Activists seized at 7720 Pie IX, unit 1, Montreal. This same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

9.1 The WTM President SITHAMPARANATHAN attended the LTTE Training in Sri Lanka

146. On July 15th, 2004, SITHAMPARANATHAN and two known members of the WTM left Montreal on an international flight for Sri Lanka.
This information was obtained from Constable Jacques BÉDARD, of INSET, assigned to work at Dorval airport, as referred to in his e-mail sent to Sergeant René HAMEL of INSET ("Sgt. HAMEL"), on July 15th, 2004. (39)
I believe that SITHAMPARATHAN and the other members of the WTM were on their way to Sri Lanka to attend the LTTE training for foreign activists.
147. On August 13th, 2004, SITHAMPARANATHAN returned to Pierre-Elliott TRUDEAU Airport in Montreal on board of flight LX088 from Zurich. At the customs check point, SITHAMPARANATHAN presented a Canadian passport number VM486590. SITHAMPARANATHAN had a stamped entry from Sri Lanka in his passports. He stated that he departed Canada on July 15th, 2004.
This information was obtained from CBSA agent Diane RICHARD as stated in her report dated August 17th, 2004, and from CBSA agent Patrice ALCINDOR as stated in his report dated August 13th, 2004. (40)
148. Attached to the document titled The Workshop for the Foreign Activists which investigators seized on April 12th and 13th, 2006, a page listing the participants who raised the LTTE national flag was found. According to the list, Mr. K. SITHAMPARANATHAN of Canada hoisted the national flag on the 25th of July 2004. The list comprises the following details of those who hoisted the LTTE flag for The Seminar for the Foreign Activists:

20.07.04	Mr. A. Pararajasingam (Australia)	Mr. Aruran (Australia)
21.07.04	Mrs. Vasanthi Francis (Norway)	Miss. Jeyaledchumy (Malaysia)
22.07.04	Mr. M. Baskaramoorthy (Germany)	Mr. Jeyabalan (Denmark)
23.07.04	Mrs. Shakila (Canada)	Mrs. T. Saroja (Italy)
24.07.04	Mr. Ra. Nagalingam (Germany)	Mr. Ravi (Sweden)
25.07.04	Mr. K. Sithamparanathan (Canada)	Mr. K. Prem (France)
26.07.04	Mr. S. Vasantharayan (England)	Mr. Rajan (Germany)
27.07.04	Mr. P. Albert (Swiss)	Mr. S. Jeevanathan (Swiss)
28.07.04	Mr. N. Maheswaramoorthy (Holland)	Mr. Karikalan (Malaysia)
29.07.04	Mr. V. Kirubakaran (France)	Mr. Nadanapatham (Denmark)
30.07.04	Mr. Xavier (Canada)	Mr. Rajan (France)

This information was obtained from the translation of the document titled The Workshop for the Foreign Activists seized at 7720 Pie IX, unit 1, Montreal. This same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

149. In the latter pages of the document titled The Workshop for the Foreign Activists, it mentions in one of the paragraphs that the person who will be hoisting the flag must be: a qualified person; a person who follows the norms of the Tamils; a person who has good knowledge of their tasks; and as per their clothing, they should wear black and white.

This information was obtained from the translation of the document titled The Workshop for the Foreign Activists seized at 7720 Pie IX, unit 1, Montreal. This same document was also seized at 4162 Van Horne Avenue, Montreal. (33)

150. Between July 22nd, and July 30th, 2004, pictures were taken during The Seminar for the Foreign Activists in Sri Lanka. On one of the pictures (July 25th) taken of Philipiah PATHIMATHA, a Toronto WTM member, SITHAMPARANATHAN can be seen standing in the background.

This information was obtained from a picture found on the hard drive of a computer seized by Toronto INSET on April 22nd, 2006, as referred to by Sgt. HAMEL in his report dated April 24th, 2007. (41)

The photo of SITHAMPARANATHAN is attached. (Photo 1)

This picture confirms that SITHAMPARANATHAN was present at the Workshop held in Sri Lanka, and it also corroborates the LTTE's International Secretariat's document stating that SITHAMPARANATHAN participated in the same (hoisting of the LTTE flag).

In a testimony given by SITHAMPARATHAN at the Quebec Court on May 16th, and May 17th, 2006, he confirmed that he took part in the Workshop held from July 20th, 2004, to July 30th, 2004. This testimony will be explained in greater details, later in section 17 of this Affidavit.

As previously mentioned, SITHAMPARANATHAN is the President of the WTM.

9.2 Thanasegaram CHANDRASEGARAM - TRAINED AS AN LTTE ACTIVIST

151. On September 11th, 2004, the Air Canada flight 0871 arrived at the Pierre-Elliott TRUDEAU's Airport in Montreal with CHANDRASEGARAM on board. A verification by customs showed that he was in possession of a number of things, including a certificate with writing in English and Tamil languages. The English title on the certificate read "Colonel KIDDU College of Political Studies Tamil Eelam." In watermark on the certificate is the logo of the LTTE. Translation of the certificate states the following information:

- The seminar 2004, for foreign activists;
- Mr. Thanasegaran CHANDRASEGARAN took part in the seminar for political and miscellaneous activities;
- Held during the period July 20th, 2004 and July 30th, 2004;
- The certificate was issued by P. NEDIYAVAN on the 30th of July 2004.

This information was obtained as a result of a Search Warrant #500-26-032746-046(6.3) executed at the CBSA office on November 12th, 2004. (42)

As stated earlier, Colonel Kiddu is a former senior commander of the LTTE: an artillery corps is named after him, "The Colonel Kiddu artillery corps".

This information comes from the website www.tamilnet.com. (13.4)

I believe that Thanasegaran CHANDRASEGARAN is CHANDRASEGARAM. These facts prove the veracity of the document titled The Workshop for the Foreign Activists such as the dates of The Workshop. It also confirms that CHANDRASEGARAM received the said training session.

This information was obtained from Sgt. HAMEL's Investigative report, dated March 18th, 2008. (42)

152. On September 11th, 2004, CHANDRASEGARAM was also in possession of pictures of himself along with the LTTE leader PRABHAKARAN. One of the pictures shows CHANDRASEGARAM receiving a certificate from the hands of PRABHAKARAN. This picture is taken in front of a sign which partly states "July 30th, 2004".

This information was obtained from a photocopy of the pictures taken by CBSA

officers upon CHANDRASEGARAM's arrival at Pierre-Elliott TRUDEAU's airport, further to the execution of a Search Warrant #500-26-032746-046 executed at the CBSA office on November 12th, 2004. (49.2) (Photo 10)

The certificate seen on the photo appears to be similar to the one stated above. These pictures demonstrate a direct link between CHANDRASEGARAM and the LTTE. Furthermore, the fact that he receives his diploma directly from the LTTE leader confirms that the LTTE does offer training for its foreign activists.

As previously mentioned, CHANDRASEGARAM is the co-owner of 4160 and 4162 Van Horne Avenue, Montreal.

9.3 Santhirakumar PERAMPALAM - TRAINED AS AN LTTE ACTIVIST

153. On September 11th, 2004, PERAMPALAM, a member of the WTM, arrived at the Vancouver International Airport on flight no. 18 of Singapore Airline where he declared coming back from Sri Lanka. The customs inspector observed an item in the luggage of PERAMPALAM which he described as a certificate which had "Colonel KIDDU College of Political Studies Tamil Eelam" on the foreground written on it. On the background, it had Liberation Tigers of Tamil Eelam with the emblem of a tiger.

This information was obtained from Customs officer Robert BELL ("Inspector BELL") of the CBSA, as referred to in his report dated September 12th, 2004. (43)

154. The translation of the Tamil writing on the above noted certificate indicates the following:

- The seminar 2004, for foreign activists;
- Mr. Perampalam CHANDRAKUMAR took part in the seminar for political and miscellaneous activities;
- Held during the period July 20th, 2004 and July 30th, 2004;
- "The thirst of Tigers are Tamil Eelam" ;
- The certificate was issued by P. NEDIYAVAN on the July 30th 2004.

This information was obtained from the translation of a copy of the certificate found in the luggage of PERAMPALAM. (43)

It confirms that PERAMPALAM is a foreign activist for the LTTE and that he received their training session. Also, I believe that Perampalam CHANDRAKUMAR is PERAMPALAM.

155. Also in PERAMPALAM'S possession was a new digital camera Canon G-5 model, 2 CD's and 2 compact flash memory cards, one of 32mb and the second of 512mb. The disks contain numerous photographs of him holding military weapons. The photographs show him holding military weapons such as a AK-47 rifle, an anti-tank rocket launcher, an anti-aircraft machine gun set up on a tripod. PERAMPALAM can also be seen holding a mortar shell near a fixed mortar. It appears as though foreign activists who participated in The Workshop could manipulate a number of weapons and be photographed holding them. The data associated to those numerical pictures show that they were taken on July 24th, 2004. Some photos transported by PERAMPALAM depict what took place in The Seminar for the Foreign Activists in July 2004.

This information was obtained from Inspector BELL of the CBSA, as referred to in his report dated September 12th, 2004. (43.1) (Photo 3)

Some of the photos taken are from the field events which took place during The Workshop for the Foreign Activists held from July 20th, 2004 to July 30th, 2004. They corroborate the summarized documents sent to the WTM by the International Secretariat of the LTTE in relation to the LTTE training. Furthermore, it confirms that PERAMPALAM took part in the said Workshop.

156. Examination of a photograph in possession of PERAMPALAM on September 11th, 2004, shows him resting his hand on a tombstone. The tombstone bears the Tamil inscription:

"The martyr"
Iyalarivu
Rasathurai Kajaluxmy
no. 425, 8th unit Tharumapuram
died as martyr on 29-09-1998.

This information was obtained from Inspector BELL of the CBSA, as referred to in his report dated September 12th, 2004. (43.1)(Photo 4)
As previously said, PERAMPALAM is also known as Easan.

9.4 Muralee Karan THURAIRATNAM met with PRABHAKARAN

157. I have completed a review of photographs seized by members of Montreal INSET following the execution of a Search Warrant on April 13th, 2006, at 7720 Pie-IX Boulevard, unit 1, Montreal. Of the photographs seized, one depicts the actual leader of the WTM, THURAIRATNAM, with PRABHAKARAN, who are accompanied by a woman and a young child.

This information was obtained from a review of a photograph seized at 7720 Pie IX Boulevard, unit 1, Montreal on April 13th, 2006, exhibit 2006-20, item 3.8. (Photo 5)

158. Also located in the seizure was a photograph of THURAIRATNAM with a man believed to be Colonel SOOSAI, the commander of the Sea Tigers.

This information was obtained from a review of a photograph seized at 7720 Pie IX Boulevard, unit 1, Montreal on April 13th, 2006, exhibit 2006-20, item 3.8. (Photo 6)

159. On June 23rd, 2006, at 11:45am, Corporal Claude CLOUTIER of INSET, ("Cpl. CLOUTIER") and Cpl. BOUDREAU attended the residence of THURAIRATNAM at [REDACTED] to serve him a copy of a notice of Application regarding the extension Order of the items seized upon the Search Warrant executed at his residence on April 13th, 2006. THURAIRATNAM was at home with his two children. THURAIRATNAM identified himself with a driver's licence.

This information was obtained from Cpl. CLOUTIER's report, dated June 23rd, 2006. (44)

The identification of THURAIRATNAM confirms that it is him on the photos with PRABHAKARAN and SOOSAI.

10 **WTM MEMBERS OPERATE AS PER THE DIRECTIVES OF THE LTTE OPERATIONS MANUAL**

160. As previously mentioned in this Affidavit, one of the most important documents seized is titled Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam dated July 28th, 2003. In this Affidavit, I will refer to this document as the LTTE Operations Manual. This manual establishes the guidelines to be followed by the foreign branches such as the WTM and contains these four themes:

- (1) Propaganda and Media;
- (2) Fundraising from the public;
- (3) Activities of sub-organizations;
- (4) Tamil's welfare associations.

This information comes from a translation of the document seized at 7720 Pie IX Boulevard, unit 1, Montreal. (32)

161. *In order to explain how the WTM follows the guidelines of the LTTE Operations Manual, I will provide examples that will fall under these themes mentioned above. These will illustrate the links between the LTTE and the WTM.*

I will also demonstrate how the building at 4160-4162 Van Horne is used for storage of WTM and LTTE propaganda material used in various events such as Martyr's Day and Black Tigers Day.

10.1 Propaganda and Media

162. The LTTE Operations Manual dictates the following as a goal of the activities for foreign branches:

"Gather the Tamil diaspora of foreign residence in order to support our freedom struggle, and build up the feeling of Tamil nations."

This information was obtained from the LTTE Operations Manual, seized at 7720 Pie IX Boulevard, unit 1. (32)

163. The LTTE Operations Manual dictates the following in regards to propaganda for Tamils in the Propaganda and Media section:

"The important events of Tamil Eelam: The personnel in charge for propaganda activities must emphasize the clear understanding of the importance to Tamil Eelam within the events and performances in producing and staging by the creative art club, by the woman's federation and by the educational institutions."

This information was obtained from the LTTE Operations Manual, section 1-1-3, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

These instructions are clearly followed by the WTM as they have been found organizing and participating in Martyr's Day celebrations, Black Tigers Day celebrations as well as fundraising cultural events. I will explain these in further details.

164. On November 27th, 1989, the LTTE leader, PRABHAKARAN, proclaimed "that

November 27, on which day the first liberation fighter attained martyrdom in the cause of Tamil Eelam, will be commemorated as National Heroes Day". In regards to the National Heroes Day, PRABHAKARAN gave a speech and said "Today is a very important day in the history of our liberation struggle. We have proclaimed this day as the National Heroes Day to remember the 1307 martyrs who sacrificed their lives for the noble cause of liberating Tamil Eelam".

This information was obtained from my query done on January 8th, 2007, on page 20 of an article titled "Velupillai Pirabakaran: a profile" published on the www.tamilnation.org website. (10.3)

This event which is organized yearly by the WTM is in support of the LTTE.

10.1.1 Tamil publications

165. The Propaganda and Media section of the LTTE manual is subdivided in three categories:

- Propaganda for Tamils
- Propaganda for foreign residence
- Publication Division

In the propaganda for Tamils section, foreign branches are encouraged to:

- Encourage all of the Tamils to read our Tamil publications such as: Viduthalai Pulikal (Liberation Tigers), Erimalai (Volcano), Eelamurasu (Elam trumpet), Tamil Guardian, and Ulaka Thamilar (World Tamils);
- Make necessary arrangements, through the district in charge personal and volunteers that all of our publication to reach the general public.

This information was obtained from the LTTE Operations Manual, section 1-1-2, seized at 7720 Pie IX Boulevard, Unit 1, Montreal, on April 13th, 2006. (32)

I will show in the next paragraphs that the WTM followed the instructions dictated by the LTTE manual, even after the LTTE listing of April 2006.

166. A letter dated June 18th, 2005, sent by the Activists of the WTM to V. MANIVANNAN of the International Secretariat stated that the distribution of the newspaper called World Tamil (Ulaka thamilar) was increased from 900 to 1200 subscribers.

This information was obtained from the translation of the letter seized at 7720 Pie IX Boulevard, unit 1, Montreal. (45.2)

I believe that this is an example of how the World Tamil Movement reports to the LTTE in regards to fundraising methods.

167. On April 13th, 2006, during the search at 7720 Pie-Ix Boulevard, unit 1, Montreal, investigators located a computer diskette. On the diskette, a computer document was located. The document shows the area of collections (fundraising, contributions, and newspaper distributions) of the Montreal area. These areas are listed as M1 to M9. In each area there is an area leader assisted by the activists.

Area	Leader of Area	Number of Papers distributed	Activists
M1	KIRANCHI Previous fighter- A very strong activist (10 years)	160	Sutha, Sivakumar, Tharan
M2	DOUGLAS (15 years)	236	Nesan, Paramesh, and Eason
M3	VASANTHAN A very strong activist- was previously in Paris during 94-96	169	Thevar, Sathees, Devi akka, Arasu, Suman
M4	BASKARAN A very strong activist	206	Thirumal, Thevarasa, Thushi
M5	PURACHCHI MUTUR	41	None
M6	GANESH 3 years - Currently operates a store	79	Menan, Mohan
M7	CHANDRABALA (also known as CHANDRASEGARAM He is conducting the CD sales with the stores	57	Chandran, Thavarasa, Charles, Yoges -operating a store
M8	PUSHPA 17 years. Build the martyr's tomb on his own expenses.	58	None
M9	DHEVAN since 1985.	35	None

This information comes from the translation of pages of a document seized at 7720 Pie IX Boulevard, unit 1, Montreal. Police exhibit 2006-20, item 1.58 (94.10) On April 12th, 2006, investigators seized at 4162 Van Horne nine binders labelled M1 to M9, exhibit 2006-12, item 48. In these binders, newspapers contribution forms are found for individuals or businesses which are within the said area. Example of a form (92.1)

168. On April 8th, 2006, the LTTE was listed in Canada as a terrorist group. On April 11th, 2006, police officers established surveillance on the building at 4160 Van Horne Avenue, Montreal. They observed THURAIRATNAM and three other men remove material from

4160 Van Horne Avenue and load it into the van licensed 787 KAX. The men then drove to a recycling centre at 6925 Chemin Côte-des-Neiges, Montreal and disposed of the material that they had removed from the WTM office. Police officers maintained surveillance on the site and subsequently seized twenty-one Ulaka Thamilar (World Tamils) newspapers amongst other items.

This information was obtained from a report by Corporal Henrich NEUWIRTH of INSET, ("Cpl. NEUWIRTH"), dated April 19th, 2006 (47.2); and from Cpl. CLOUTIER's report dated April 11th, 2006. (47.1) (photo 7)

The newspapers have the same title in Tamil as the newspapers photographed in the basement of the World Tamil Movement on April 12th, 2006, as stated in the paragraph below.

169. On April 12th, 2006, during a Search Warrant executed at 4160 Van Horne Avenue, Montreal, pictures were taken of the basement by the Identification section member, Corporal Denis LEBLANC ("Cpl. LEBLANC"). Located in the basement were piles of Tamil newspapers. The titles of all the newspaper were the same, World Tamil (Ulakathamilar).
The information was obtained from the pictures taken by Cpl. LEBLANC and later translated by the translator. (48.1) (Photo 8)
170. On September 3rd, 2008, INSET executed a special Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, five Erimalai magazines were seized. The magazines are dated February, April and May 2006.
This information comes from a review by Corporal Steve DUBREUIL ("Cpl. DUBREUIL") of exhibit 2008-11, item F219. (51) (Photo 12)
Erimalai (volcano) is a Tamil publication that the LTTE Operational Manual asks their foreign branches, such as the World Tamil Movement, to: "Encourage all of the Tamils to read Tamil publications such as Erimalai". (33)
171. On September 3rd, 2008, INSET executed a special Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, investigators seized several piles of ULAHATHAMILAR newspapers dated 2008.
This information comes from a review by Cpl. DUBREUIL of exhibit 2008-11, items J142, J143 and J144 (74) (photos 34.1, 34.2, 34.3)
I believe that Ulahathamilar and Ulakathamilar are two acceptable spellings for the same newspaper.

10.1.2 The Martyr's Day 2003

172. Ravindrarajah SANGARAPILLAI, a known member of the WTM, signed the rental agreement with the Mont-Royal High School for the above mentioned event.
This information was obtained from Constable Claude RIOUX ("Cst. RIOUX"), as stated in his reports dated December 1st, 2003 (52.1) and December 17th, 2003 (52.2); and from Constable David PETIT ("Cst. PETIT") as stated in his report, dated November 24th, 2003. (52.4)
173. Ravindrarajah SANGARAPILLAI was also one of the administrators and the secretary of the Tamil Eelam Soccer Association ("TESA"). The address provided for this association was 4160 Van Horne Avenue, Montreal. This organization is no longer

registered as a company since 2004.

This information was obtained from a report by investigative assistant Richard RONDEAU's of INSET, ("Mr. RONDEAU"), dated February 20th, 2008 (54.2); and as per CIDREQ search made by Cpl. DUBREUIL on February 25th, 2009. (38.14)

174. I have read a surveillance report dated November 29th, 2003, where police officers of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on November 29th, 2003, in and around the city of Montreal:

"The WTM held the event to celebrate Martyr's Day. The event was held at Mont Royal High School, 50 Montgomery Street, Mont-Royal. A very prominent "sign" was set up outside at the entrance of the school, displaying the area of Sri Lanka that is being claimed by the LTTE, and the logo of the organization (head of a tiger surrounded by bullets and two rifles)."

This information was obtained from the observations made by Cst. RIOUX, as stated in his report dated December 1st, 2003 (52.1); and from Cpl. BOUDREAU's report dated December 3rd, 2003. (52.6)

175. During the event, the President of the WTM, SITHAMPARANATHAN, was observed sitting at a table at the entrance of the school, manipulating funds derived from the tickets sale. Two women were sitting with him. At one point, one of the two women took a bundle of bills and folded them in two, before putting them inside of a small plastic bag. She then placed the plastic bag inside of a black purse that she kept behind the table. There were approximately 700 people in attendance for the event.
This information was obtained from the observation of Cst. RIOUX, as stated in his reports dated December 1st, 2003 (52.1) and October 26th, 2004. (52.3)
176. Inside of the gymnasium of the school, 50 look-alike tombstones were positioned on the floor, each associated with the picture of an individual dressed in military or civilian clothing. A montage made of small plastic pieces of different colours was placed on the floor of the gymnasium which depicted a combatant dressed in military fatigues, carrying in his arms a bleeding combatant. The LTTE logo was visible inside the gymnasium.
This information was obtained from the observations of Cst. RIOUX, as stated in his report dated December 1st, 2003. (52.1)
177. A 4' X 8' table was set up to the right of the entrance of the gymnasium. A number of paraphernalia items such as CDs, DVDs, VHS films and small LTTE flags were for sale. According to a participant of the event, those items were related to "freedom fighters". In the aisle leading to the gymnasium, a 4' X 8' table was set up with burning candles. Two women were standing at both ends of the table each holding a tray. People from the public were placing bills on the trays as they went by. Twenty dollar denominations were observed on a silver tray held by one of the two women.
According to a member of the public in attendance, there was not a specific entry fee, but people can give \$20, \$50, etc. Paying only \$2 would not be well perceived.
This information was provided to Cst. RIOUX by an unknown male, as stated in his report dated December 1st, 2003. (52.1)
178. On April 11th, 2006, Investigators of the Montreal INSET seized tickets that were for sale

for the Martyr's Day Celebration, dated November 29th, 2003. On the ticket, one can see a picture of PRABHAKARAN and a picture of Lt. MALATHY, the first female martyr. Also on the ticket was the location of the event as being the Mont Royal Secondary High School, located at 50 Montgomery, Montreal. As stated on the ticket, it was for sale for \$2 each. Also located on the ticket was a drawing of several tombstones.
This information was obtained from my review of the above ticket seized at the Eco-centre located at 6925 Côte-des-Neiges, exhibit 20006-13, item 31. (53)

10.1.3 The Martyr's Day 2004

179. The Martyr's Day event took place on November 26th, and 27th, 2004, at a High School located at 500 Dollard Street, Montreal.
This information was obtained from Informant [REDACTED], as referred to by [REDACTED] in his report dated [REDACTED]. (127.1)
180. I have read surveillance reports in regards to surveillance operations conducted on November 26th, 2004, where police officers of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on November 26th, 2004, in and around the city of Montreal:
- At 4:20pm, a white cube truck licensed L212991, registered to Jesuthasan EMANUEL, was observed parked facing out in the driveway of the WTM building at 4160 Van Horne Avenue, Montreal. At 6:30pm, the vehicle was removed from the driveway and a van licensed FN80820, registered to Jeyatharan KARUNAKARAN, proceeded to back in and take its place. A garage door located on the south-east side of the building gives access to the end of the driveway. A WTM administrator, KARUNANANTHASWAMY, was present at 4160 Van Horne Avenue;
This information was obtained from Sergeant/Detective Isabelle LEGAULT of the Sûreté du Québec, ("Sgt./Det. LEGAULT"), as stated in her surveillance report dated February 8th, 2005. (55.2)
 - At 6:46pm, the van licensed FN80820 arrived at the "École pour Adultes Outremont", 500 Dollard Street, Montreal, and parked near the delivery door. People proceeded to unload the vehicle and bring the material inside of the school. Shortly after, the white cube truck licensed L212991 also arrived at the school. The vehicle backed up to the delivery door. Approximately six individuals proceeded to unload the vehicle and bring the material inside of the school. KARUNANANTHASWAMY was present at the school;
This information was obtained from a report by Constable Marcel HENRI, ("Cst. HENRI"), dated November 26th, 2004. (55.1)
 - At 7:00pm, the van licensed FN80820 returned to 4160 Van Horne Avenue. At 7:46pm, the van is seen backed into the driveway. At 7:58pm, the vehicle left in direction of the school at 500 Dollard Street. At 8:04pm, the vehicle arrived and parked near the delivery door;
This information was obtained from the observations made by Sgt./Det. LEGAULT, as stated in her surveillance report dated February 8th, 2005

- (55.2); and from Cst. HENRI's report dated November 26th, 2004. (55.1)**
- At 8:05pm, the white cube truck licensed L212991 returned to 4160 Van Horne Avenue and proceeded to back in the driveway. At 8:30am, the cube truck left 4160 Van Horne Avenue and returned to the school at 500 Dollard Street; **This information was obtained from Sgt./Det. LEGAULT, as stated in her surveillance report dated February 8th, 2005. (55.2)**
 - At 8:28pm, the van licensed FN80820 returned to 4160 Van Horne Avenue where carton boxes were loaded into the vehicle. At 8:38pm, the van licensed FN80820 arrived at the school at 500 Dollard Street; **This information was obtained from Sgt./Det. LEGAULT, as stated in her surveillance report dated February 8th, 2005 (55.2); and from Cst. HENRI's report, dated November 26th, 2004. (55.1)**
181. I have read a surveillance report dated November 27th, 2004, where police officers of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on November 27th, 2004, in and around the city of Montreal:
- At 1:30pm, five individuals worked in front of the school at 500 Dollard Street, Montreal, at installing a large sign depicting the logo of the LTTE. A Tamil title inscribed underneath the LTTE logo said "Day of the Brave Soldiers" after translation. The sign was erected at a place where people driving south bound on Dollard Street would arrive directly in front of it. When darkness arrived at approximately 4:30pm, parts of the set up were illuminated so that the title and the bullets around the head of the tiger were lit up with orange lights; **This information was obtained from the observations made by Cst. HENRI, as referred to in Cpl. CLOUTIER, dated November 27th, 2004. (55.3) (photo 13)**
I believe that "Day of the Brave Soldiers" is a reference to the Martyr's Day.
 - At 3:52pm, CHANDRASEGARAM came out of the delivery door of the school transporting 3 large carton boxes using a dolly. He stopped behind the van licensed FN80820, where an individual placed the boxes inside the back of the van. **This information was obtained from a video taken by Sgt. HAMEL and from his observations of the video taken on November 27th, 2004. (video 1)**
It shows that the co-owner of 4160 Van Horne, CHANDRASEGARAM, is implicated in the preparation of the Martyr's event.
 - At 4:18pm, KARUNANANTHASWAMY left the school, driving the van licensed FN80820. **This information was obtained from a video taken by Sgt. HAMEL and from his observations of the video taken on November 27th, 2004. (video 1)**
182. Under a hyperlink dated November 27th, 2004, photographs of the Martyr's Day event were posted on the Internet website www.tamilnaathan.com. Among the pictures seen, Mayor Michael APPLEBAUM ("Mayor APPLEBAUM") was observed while he was attending the event. Some members of the WTM that appeared on some of the pictures

are:

- KARUNANANTHASWAMY, an administrator of the WTM;
- SITHAMPARANATHAN, the WTM president;
- BALENDRA, the Canadian Tamil Congress ("CTC") president, and in charge of political contacts for the WTM.

This information was obtained this information from Sgt. HAMEL, as stated in his report dated April 8th, 2005. (55.5)

183. Under a hyperlink dated November 30th, 2004, photos of the 2004 Martyr's Day event described above were posted on the Internet at address www.tamilnaatham.com. The photo named PICT5688.jpg showed the LTTE sign mentioned above (paragraph 181) that was installed outside of the school at 500 Dollard Street.
This information was obtained this information from Sgt. HAMEL, as stated in his report dated April 8th, 2005. (55.5) (photo 14)
I believe that the date of November 30th, 2004, posted on the Internet site indicates the date that the information was uploaded. The pictures show the event that took place on November 27th, 2004, at 500 Dollard Street.
184. The Internet photo named PICT5696.JPG showed a general view of the decor installed in the gymnasium of the school. On the floor near the centre of the gym, there was a large flat surface object resembling a carpet or a giant jigsaw puzzle. It portrayed a combatant dressed in combat fatigues carrying a bloodied combatant. At one end of the gymnasium, on both sides, at least 30 look-alike tombstones were disposed as they would be in a cemetery. Four very large wall size banners were hanging at the front. The first on the left portrayed 2 soldiers raising weapons in the air. The second one portrayed a cemetery with the photo of a person in the middle. The third one showed a portrait of the Black Tigers logo. And the last one on the right showed the same portrait that is found on the floor (fighter carrying bloodied fighter), but with the island of Sri Lanka in the background. Two LTTE flags were hung in the wall at the centre of the gymnasium.
This information was obtained from my observations of the photo named PICT5696.JPG (photo 15)
The large flat surface object described above is similar to what Cst. RIOUX observed in the gymnasium during last year's Martyr's Day celebration (see paragraph 176). It was described as a montage made of small plastic pieces.
185. The Internet photo named PICT5944.JPG showed KARUNANANTHASWAMY positioned at a podium equipped with a microphone, as if he was addressing the public. The side of the podium that faced the public was covered with the LTTE flag. Placed above the flag was a yellow sign with Tamil language written on it. The red colour writing said "Heroes Day 2004". The blue colour writing below said "Quebec Branch".
This information was obtained from my observations of the photo named PICT5944.JPG (photo 16); and from Sgt. HAMEL as stated in his report dated January 24th, 2008. (55.7)
186. The Internet photo named PICT5851.JPG showed a decorated set-up consisting of a hanging coffin painted in military colours, with wings attached to it similar to a plane. Placed on top of the "coffin" are flowers, picture frames (photo of one male is visible), and small LTTE flags.

This information was obtained from my observations of the photo named PICT5851.JPG. (photo 17)

187. On April 12th, 2006, Montreal INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. An object identical to the hanging coffin as described above was stored outside behind the building.
This information was obtained from my observations of the photo named 03740009.JPG, taken by Cpl. LEBLANC. (Photo 18)
188. The internet photo named PICT5713.JPG showed a woman raising the LTTE flag.
This information was obtained from my observations of the photo named PICT5713.JPG. (photo 19)
189. The Internet photo named PICT5929.JPG showed young girls performing a dance dressed in traditional clothing. The decor on the stage behind them displays a large red banner with yellow writing in Tamil that says; "Heroes Day - November 27th". Two yellow logos of the LTTE are printed at each end of the banner. Below the banner, on the stage, a large painted decor shows burning candles and the photo of two soldiers dressed in combat uniforms of the LTTE. The Tamil writing on top of the decor says "Dormitory of Heroes".
This information was obtained from my observations of the photo named PICT5729.JPG (photo 20)
190. The Internet photo PICT5701.JPG depicts a man in LTTE uniform in a decoration resembling a shrine. The man is Lieutenant SHANKAR. He is believed to be the first LTTE fighter to die in combat on November 27th, 1982.
This information was obtained from Sgt. HAMEL's report, dated January 24th, 2008. (55.7) (photo 21)
191. The WTM issued a cheque of \$1,000 to the Commission Scolaire Marguerite Bourgeoys as a security deposit for the Martyr's Day event. Dated November 14th, 2004, the cheque number 1111 was written from the WTM TD bank account #4336-0928569. The following comment is handwritten in the "Re" portion of the cheque: "For Maveer Hall Security". The cheque has been cashed by the school.
This information was obtained from my review of the cheque number 1111, seized at 4162 Van Horne, Montreal. (56)
This demonstrates the use of the WTM TD bank account #4336-0928569 for the Martyr's Day event.
192. The WTM recorded in details the various source of revenues collected during the 2004 Martyr's Day event. The handwritten information on a document seized at 4162 Van Horne Avenue, Montreal, states the following:
- | | | | |
|----|-------------------------------------|------|----------|
| 1. | <i>Envelopes with name</i> | = \$ | 1,578 |
| 2. | <i>No name</i> | = \$ | 386 |
| 3. | <i>On tray</i> | = \$ | 1,040 |
| 4. | <i>Sales of flowers</i> | = \$ | 214.30 |
| 5. | <i>Found in the hall</i> | = \$ | 10 |
| 6. | <i>No name in envelopes</i> | = \$ | 1,692.75 |
| 7. | <i>Ticket sales at the entrance</i> | = \$ | 734 |

Total = \$5,855.05

This information was obtained from my review of documents seized at 4162 Van Horne Avenue, Montreal. (57)

This information also corroborates the observations made by Cst. RIOUX (paragraph 177) during the 2003 Martyr's Day event regarding women with trays receiving money, ticket sale, flowers, etc.

193. The WTM printed tickets for the Martyr's Day event of November 27th, 2004. The picture on the tickets shows many tombstones in a cemetery. The information on the tickets contains English and Tamil writings, it indicates the following:

- Conducted by World Tamil Movement of Quebec;
- HEROES DAY 2004;
- 27.11.2004;
- Saturday evening at 05:00 o'clock
- Adultes High School
- \$2 donation
- Info: (514) 735-9984
- 500 Dollard, Outremont (Van Horne & Dollard) near Outremont Metro.

This information was obtained from my review of the ticket seized on April 11th, 2006, exhibit 2006-13, item 53. (58)

194. The phone number 514-735-9984 printed on the ticket is registered to the WTM at 4160 Van Horne Avenue, Montreal. (59)

This information was obtained from Mr. RONDEAU's investigative report, dated March 20th, 2007 (59.1); from Cpl. BOUDREAU's investigative report, dated January 22nd, 2004 (59.2); and from Cst. PETIT's investigative report dated November 24th, 2003 (59.3).

10.1.4 The Martyr's Day 2006

195. The WTM entered into an agreement with the Montreal School Board for the rental of spaces inside of Polyvalente Lucien Pagé at 8200 Boulevard St-Laurent, Montreal. The details on the contract were under the name of WTM at 4160 Van Horne Avenue, Montreal. The person responsible was Mr. Ravi. The telephone number was 735-9984. The duration of the rental was for November 26th, 2006, between 2:00pm to 7:00pm and for November 27th, 2006, between 5:00pm to 1:00am. The cost was \$652.03, and it was paid by cheque on November 8th, 2006.

This information was obtained from a copy of the rental agreement dated November 23rd, 2006. (60)

196. I have read a surveillance report dated December 20th, 2006, in regards to a surveillance operation on November 26th, 2006, where members of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on November 26th, 2006, in and around the city of Montreal:

- At 1:00pm, a Plymouth van licensed 787KAX, registered to KARUNANANTHASWAMY, was removed from the driveway of 4160 Van Horne

Avenue to allow a green Honda Accord licensed 615HBC, registered to CHANDRASEGARAM, to take its place in the driveway.

This information was obtained from a report by Sergeant/Detective Sylvain BENJAMIN of INSET, ("Sgt./Det. BENJAMIN"), dated December 20th 2006. (61)

- At 1:14 pm a VIA ROUTE cube van licensed FDD9692 arrived at 4160 Van Horne and backs up into the driveway.
This information was obtained from Sgt./Det. BENJAMIN's report, dated December 20th, 2006. (61)
- At 1:28pm, two males are observed taking boxes out of 4160 Van Horne and placing them in the black VIA ROUTE van.
This information was obtained from Sgt./Det. BENJAMIN's report, dated December 20th, 2006. (61)
- At 2:29pm, the VIA ROUTE van licensed FDD9692 left 4160 Van Horne Avenue. It arrived at the Polyvalente Lucien Pagé, 8200 boulevard, St-Laurent. At 2:47pm, the VIA ROUTE van licensed FDD9692 arrived at the school. The Honda Accord licensed 615HBC also arrived at the school, along with three other vehicles. Seven males entered the school. Several of these individuals are seen unloading material from the VIA ROUTE truck into the school.
This information was obtained from Sgt./Det. BENJAMIN's report, dated December 20th, 2006. (61)

197. I have read a surveillance report dated November 27th, 2006, where the members of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on November 27th, 2006, in and around the city of Montreal:

- At 4:40pm, some individuals proceeded to install lights and decorations outside the school's main entrance.
This information was obtained from Sgt. HAMEL, as stated in his report dated December 5th, 2006. (62.1)
- At 6:05pm, two males are seen placing balloons and posters near the school. One of those posters was seized by investigators. The poster contained the information in either Tamil or English:
 - Important notice;
 - Tamil National Remembrance Day;
 - 27-11-2006;
 - Change of Venue;
 - The above event supposed to be held at St. Marie High School 100 Sauvé East, Montreal;
 - On the same day;
 - Will take place at 06:00 p.m.;
 - At Lucien Pagé Polyvalente, 8200 St. Laurent Boulevard, (Metro de Castelnau, Bus #55).

This information was obtained from Sgt. HAMEL, as stated in his report dated December 5th, 2006; and from exhibit 2006-28, item 4. (62.1) (photo 22) I believe that the wording "Tamil National Remembrance Day" refers to the National Heroes Day (or Martyr's Day) as designated by the leader PRABHAKARAN.

- At 7:17pm, during the course of the event inside of the auditorium of the school, a thirty-five minute speech in Tamil of PRABHAKARAN was projected on the stage. The LTTE logo was visible on the podium that PRABHAKARAN used to convey his speech.

This information was obtained from Constable David MANCINI's report ("Cst. MANCINI") dated November 27th, 2006. (62.2)

As said earlier, the LTTE was listed as a terrorist group in April 2006. It is interesting to see that the WTM continued with the events in support of the LTTE and in accordance with the Manual regardless of the LTTE's terrorist group designation in Canada.

10.1.5 The Martyr's Day 2007

198. I have read a surveillance report dated January 17th, 2008, in respect to a surveillance operation on December 1st, 2007, where police officers of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on December 1st, 2007, in and around the city of Montreal:

- At 10:10am, a white Econoline van licensed 264SGK was parked on the street near the driveway of 4160 Van Horne Avenue. The vehicle was loaded with material;

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 11:17am, THURAIRATNAM, the leader of the WTM, arrived at 4160 Van Horne Avenue in a red Toyota Corolla licensed 121SGK. He entered 4160 Van Horne Avenue accompanied by a female and two children;

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 12:09pm, the Ford Econoline van licensed 264SGK finally arrived at the "Centre d'éducation des adultes Outremont" at 500 Dollard Street, Montreal, after experiencing some mechanical problems. The Ford Econoline parked directly in front of the main entrance. At least 6 individuals proceeded to remove the material from the van and carry it inside of the school. Amongst the large quantity of material observed, some of the things would be described as follows:

- A 4' X 8' sign showing combatants in uniform holding weapons; (photo 25)
- A 4' X 8' sign showing two people standing in a cemetery holding burning torches; (photos 23.1 et 23.2)

- A large sign containing the drawing of combatants holding weapons with a round logo showing PRABHAKARAN as a younger combatant. (photo 24)

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008 (63); and of the observations of Cpl. DUBREUIL made on January 29th, 2009, when reviewing the surveillance photos taken on December 1st, 2007. (Photo 42 for sample of surveillance photos)

- At 12:32pm, the Ford Econoline licensed 264SGK left the school and returned to 4160 Van Horne Avenue. MANICKAM assisted by two other males proceeded to remove material from 4160 Van Horne Avenue and placed it inside of the van. Among the material observed, some of the things would be described as followed:

- A commercial size ventilator;
- A blue plastic container and a yellow plastic container;
- A flag base;
- An ornamental gold piece of approx 4' long with a rooster at the end;
- A second ventilator;
- Wooden benches;
- A CD or DVD player;
- A red plastic tool box;
- A carton box containing yellow and red triangle pieces (flags).

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 12:51pm, the Ford Econoline licensed 264SGK left 4160 Van Horne Avenue. A minute later, THURAIRATNAM, the WTM leader, and SITHAMPARANATHAN, the WTM president, came out of 4160 Van Horne Avenue and left in a red Toyota Corolla licensed 121SGK.

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 12:59pm, the Ford Econoline licensed 264SGK returned to the school and parked directly in front of the main entrance. A number of individuals proceeded to unload the material listed above (loaded at 12:32 pm) and carry it inside of the school.

This information was obtained from Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 1:03pm, THURAIRATNAM and SITHAMPARANATHAN arrived at the school. They entered into the school through the front entrance.

This information was obtained Sgt. HAMEL's investigative report, dated January 17th, 2008. (63)

- At 1:39pm, the Honda Accord licensed 615HBC of CHANDRASEGARAM arrived at the school and parked near the front entrance. CHANDRASEGARAM removed a large box from the passenger side of his vehicle and carried it inside of the school.

This information was obtained from the observations made by Sgt. HAMEL as stated in his report, dated January 17th, 2008. (63)

- At 3:22pm, SIVARAMAN arrived at the school near the delivery entrance in an older model vehicle which looked like a Dodge Caravan. He retrieved from this van electrical type equipment such as an extension cord, heavy duty wires, booster cables, etc. and brought them inside of the school. Ten minutes later, he returned to the vehicle and retrieved a large electrical panel which he brought inside through the delivery entrance.

This information was obtained from the observations made by Sgt. HAMEL as stated in his report, dated January 17th, 2008. (63)

CHANDRASEGARAM and SIVARAMAN, co-owners of 4160-4162 Van Horne, were involved in the 2007 Martyr's Day event preparation.

199. The following observations were made by investigators who were present inside and outside the school to monitor the event:

- At 5:55pm, a male is seen filming the audience which consisted of mostly adults. By 8:00pm, more than 600 people were present;
- At 6:10pm, the LTTE flag was solemnly raised;
- At 6:49pm, a speech given by the LTTE Leader PRABHAKARAN was projected on the stage. It ended at 7:22pm;
- At 7:22pm, a caucasian male was observed giving a speech to the 600 and more participants from the Tamil community. The male praised Maxime BERNIER, who at the time was Minister of Foreign Affairs for the Conservative Party of Canada, and spoke about the position of the government which is to favour the non-violence, diplomatic solutions to the conflict, etc;
- At 7:29pm, the caucasian male exited the school and drove away in a Mercedes Benz licensed 333RBJ. Subsequent verification of the ownership revealed that the vehicle was registered to Maurice BROSSARD of 786 Houde Street, Laprairie.

This information was obtained from Sgt. HAMEL's report, dated December 1st, 2007 (63); and from Cst. MANCINI's report dated December 5th, 2007. (64)

200. On December 4th, 2007, an Internet query revealed that Maurice BROSSARD is a Conservative Party of Canada candidate for the Quebec riding of Laprairie/Brossard. **This information was obtained from Édith JACQUES, civilian employee of Montreal INSET, ("Mrs. JACQUES"), as stated in her report dated December 6th, 2007. (65)**
201. On February 4th, 2008, Cpl. BOUDREAU met with Mr. Maurice BROSSARD ("Mr. BROSSARD") to inquire about his presence at the Martyr's Day event on December 1st, 2007. Mr. BROSSARD explained that he was first approached by someone representing the CTC during the federal by-election of Outremont in the fall of 2007. Subsequent to that meeting, he received invitations via electronic mail to attend meetings or events. One such invitation came in a letter titled Quebec Tamil Women Association. Mr. BROSSARD advised that the CTC asked for his political support should he be elected as a Member of Parliament during the next federal elections. The CTC wanted Mr. BROSSARD to pressure the Canadian Government to support a

political solution to the Sri Lankan crisis.

This information was obtained from Cpl. BOUDREAU, as referred to in his report dated April 1st, 2008. (80)

The WTM followed the directives of the LTTE Operations Manual which dictates that the foreign branches must establish contact with parliamentarians and political figures at all levels of Government, in order to advance their cause. (32)

The political contact aspect of the WTM will be further examined in this Affidavit in 10.1.12.

202. On December 4th, 2007, further Internet queries of the Pro-LTTE website www.tamilnaatham.com showed that the December 1st, 2007, Martyr's Day event had been published on the Internet. Twenty-four pictures of the event were posted. The following is a brief description of some of them:

- Picture no 1: Shows the LTTE flag raised on a flagpole;
- Picture no 2: Shows the backdrop decor on the stage, depicting the portrait of the first female Black Tiger who had died next to the portrait of the first LTTE combatant who had died. Behind them is a cemetery with many tombstones. The LTTE flag is seen floating on a post in the middle. Above of the drawing Tamil writing says: "Dormitory of the Heroes";
- Picture no. 4: Shows the crowd at the event waiting in line with a flower in their hand;
- Picture no. 5: Shows a lookalike tombstone with flowers placed on it;
- Picture no. 6: Shows Mr. BROSSARD addressing the crowd on a podium. The yellow sign in Tamil attached to the podium says: "Remembrance Uprising Day 2007";
- Picture no.11: Shows a male apparently reading at the podium. WTM President SITHAMPARANATHAN and WTM member MANICKAM are seen standing behind the podium. MANICKAM holds a microphone in his hand;
- Picture no. 14: Shows a musical group on the stage;
- Picture no. 15: Shows dancers in traditional clothing;
- Picture no. 17: Shows a small coffin draped with the LTTE flag. The picture of a female is attached to the end of the coffin. Some people in the crowd hold the small coffin in the air;
- Picture no. 18: Shows 5 young children wearing white t-shirts with the LTTE Logo on them, apparently performing a dance along with a woman. Two of the children are waving small LTTE flags;
- Picture no. 19: Shows the same performance as Picture 18, but 2 older children are holding full size LTTE flags;
- Picture no. 22: Shows a play where a boy is holding a "weapon" wearing military coloured clothing. A young woman standing next to him also holds a handgun type weapon;
- Picture no. 23: Shows a priest of South-Asian appearance holding a microphone in his hand either speaking or singing;
- Picture no. 24: Shows a play where 3 males dressed in military uniforms are addressing a male dressed in civilian clothing, in a seemingly unfriendly way.

This information regarding the photographs mentioned above was obtained from Cst. MANCINI, as stated in his report dated December 4th, 2007, and from my own observations of the pictures. (66)

203. On September 3rd, 2008, INSET executed a Special Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, investigators seized a poster with the date 01.12.2007. Translation of the poster indicates that it was to promote the December 1st, 2007, Martyr's Day celebration.
This information comes from a review by Cpl. DUBREUIL of exhibit 2008-11, item K323. (69) (photo 27)

10.1.6 The Martyr's Day 2008

204. A review of www.tamilnaatham.com website on December 3rd, 2008, reveals pictures taken from the 2008 Martyr's Day celebration which took place in Montreal. Along with photos, the following text appears:

"Yesterday, the Saturday afternoon at about 2:30 in the afternoon at the city of Montreal in Canada, the national Remembrance Day celebrations were commenced with the lighting of a traditional lamp. The event was celebrated in a high spirit, combined together with music and dance events pertained to motherland. Many obstacles have caused in various ways, even though, it was very efficiently planned and a successful event. The people crossed over numerous obstacles, arrived as huge waves, paid their floral salute to the martyrs and up to the conclusion of the event such as until 9:30 in the evening, the auditorium was fully packed with the crowd. They caused to create this event as a huge uprising and established the validity of their endearment on the motherland."

This information was obtained from the www.tamilnaatham.com website on December 3rd, 2008. (15.2)

The original black and white photos from Internet used for translation have been replaced by a color copy of the same photos obtained on March 26th, 2009, by Constable Jean MADORE of INSET ("Cst. MADORE").

10.1.7 The Black Tigers Day 2004

205. "The Tamil Tigers pioneered the art of suicide bombing with scores of assassinations of prominent politicians in Sri Lanka, as well as former Indian Prime Minister Rajiv Gandhi. More than 240 Tamil men and women have carried out suicide attacks for the Tigers. At sea, the Tigers have sent suicide bombers to ram boats packed with explosives into naval vessels, a tactic they believe other armed groups around the world are now copying from them. And on land they are notorious for detonating suicide belts full of explosives in front of prime ministers and presidents."
This information was obtained on January 30th, 2009, from the BBC on-line news service (8.9); and from the website www.tamilnation.org website. (10.5)
206. The Tamil Tiger rebels remember their suicide bombers each year on Black Tigers Day on July 5th. This is the day when Tamils everywhere remember the Black Tigers who sacrificed themselves as live weapons in the war. The first Black Tiger attack was by Captain MILLER on July 5th, 1987. On July 5th, 2007, PRABHAKARAN participated in a special commemoration event marking Black Tigers Day with several hundred Black Tiger cadres. Since the death of Captain MILLER on July 5th, 1987, until June 30th,

2007, there have been 322 Black Tigers who died in action. This information was obtained on January 13th, 2009, from the Internet website www.spur.asn.au in the web page "Chronology of Suicide Bomb Attacks by LTTE Tamil Tiger Terrorists in Sri Lanka" (27.2); on January 30th, 2009, from the BBC on-line news service (8.8); and on January 30th, 2009, from the website www.tamilnet.com. (13.5)

207. I have read a surveillance report dated July 10th, 2004, where police officers of the surveillance team observed the activities of members of the WTM. I believe that the following are accurate observations made during that surveillance on July 10th, 2004, in and around the city of Montreal;
- At 1:32pm, KARUNANANTHASWAMY and 3 unidentified males removed material from the garage of the WTM building, located at 4160 Van Horne Avenue, and loaded it into his van licensed 787KAX. Among the things loaded, there was a long pole, yellow and red in colour, sticking out of the front right passenger's window of the vehicle. This information was obtained from Sgt. HAMEL's report dated July 14th, 2004. (67.1)
 - At 1:54pm, the van licensed 787KAX left 4160 Van Horne Avenue and arrived at the "Polyvalente Lucien Pagé", 8200 St-Laurent Boulevard, Montreal, at 2:09pm. This information was obtained from Sgt. HAMEL's report dated July 14th, 2004. (67.1)
 - The following WTM members were among the people who helped prepare the auditorium for the event: KARUNANANTHASWAMY, THURAIRATNAM and PERAMPALAM. This information was obtained from Cst. MANCINI as referred to in his report dated July 12th, 2004. (67.2)
 - In the entrance hall, hundreds of pictures of soldiers dressed in black bearing the Tigers' uniform were exhibited. Near the auditorium were two tables where people could purchase tickets from a woman and two men. Approximately 140 people attended the event. This information was obtained from Cst. MANCINI as referred to in his report date July 12th, 2004. (67.2)
208. On April 12th, 2006, investigators seized at 4162 Van Horne Montreal an invoice number 3861 made out to WTM by a printing company in Montreal by the name of Amalaa. The bill contains the following information:

Sold to: World Tamil Movement

Date: 10/06/04

Quantity:	Description:	Amount:
3000	Black Tigers Remembrance Day	150
700	tickets	90
1500	Nadesan	75

1000	Sports flyers 2 side free	315
1000	Form free	
Balance		<u>120</u>
		435

This information was obtained from the copy of the invoice seized at 4162 Van Horne Avenue on April 12th, 2006, exhibit 2006-12, item 01, 7/28 (113.6); and from Sgt. HAMEL's report dated January 31st, 2008. (67.3)

209. Also seized was an internal accounting document of the WTM which reports an expense for the above-mentioned invoice. The document signed by THURAIRATNAM, who became the WTM leader in 2005, is dated July 19th, 2004. The name listed is "Amalaa". The reason is "Printing". The amount is "\$435.00". The date is "19/07/04". A handwritten comment said: "Received in hand during the month of August".
This information was obtained from the translation of the internal accounting document seized at 4162 Van Horne Avenue on April 12th, 2006, exhibit 2006-12, item 01, 7/28, page 31. (67.4)
210. Also seized was another internal accounting document of the WTM dated July 30th, 2004. It reports an expense of \$600 for a sound system during the Black Tigers Day event. The document was also signed by THURAIRATNAM.
This information was obtained from the translation of the internal accounting document seized at 4162 Van Horne Avenue on April 12th, 2006, exhibit 2006-12, item 01, 7/28, page 28. (67.5)
211. On July 6th, 2004, at 09:30am, Cst. HENRI attended the Montreal School Board at 3700 Rachel East, Montreal, and obtained a copy of the rental agreement. On the rental agreement, it states that the school premises at the Polyvalente Lucien Pagé used for the Black Tigers Day celebration was rented by the Thamilar Olli Association, 7290 Hutchison Street, unit 302, Montreal, Quebec. K.S. RAVINDRARAJAH is mentioned as the representative with a telephone number of 278-3574. The rental cost was paid in cash.
This information was obtained from my review of the rental agreement, dated June 28th, 2004. (67.6)
I believe that K.S. RAVINDRARAJAH is Ravindrarajah SANGARAPILLAI. As explained earlier, the reversing of the given name with the surname is common practice for persons of that ethnic group.
A check on the Quebec Enterprise Registrar indicates that Ravindrarajah SANGARAPILLAI was one of the administrators of The Eelam Tamil Soccer Association ("TESA"). The TESA gave its address as being 4160 Van Horne Avenue, Montreal. On May 7th, 2004, TESA was struck off the Registrar's list as a registered business. (38.14)
I believe that TESA is an auxiliary organization of the WTM as dictated by the LTTE in section 3.7 of the LTTE Operations Manual. (32)
212. The telephone number (514) 278-3574 is subscribed to by the Thamilar Olli Association located at 7290 Hutchison, Montreal, Quebec.
This information was obtained from a query conducted by Cpl. BOUDREAU on the Internet website of www.canada411.ca online directory services on May 2nd, 2005. (67.7)

Thamilar Olli is a registered business in Quebec formed of 15 administrators. It lists as its main activity to help new arrival refugees, give language classes and perform cultural activities. The president is Siva KANAGARATNAM. (38.19)

As later indicated in subsection 12.2, KANAGARATNAM is also in charge of the WTM's women's association.

I believe that Thamilar Olli is a sub-organization of the WTM.

10.1.8 The Black Tigers Day 2005

213. On a WTM activity report dated August 21st, 2005, CHANDRASEGARAM reported to the Canada Branch the activities for the month of July 2005. CHANDRASEGARAM identifies himself as the Deputy Responsible person of the Quebec Branch. The translation of the report states the following: "On Saturday the 9th day of the month of July, the remembrance of Black Tigers took place. It began with flower worship followed with many events such as: light worship, "Kavatha" event, hymns about Black Tigers, speeches... and everyone has achieved a memorable conclusion of the ceremony, by singing the song of "Believe in Tamil Eelam". Even though it was a short ceremony, however it is to be mentioned that all events were performed well".

This information was obtained from my review of the activity report, dated August 21st, 2005, seized at 4162 Van Horne Avenue, Montreal. (67.9); and pages 12-13 of a report by Cpl. BOUDREAU dated October 19th, 2006. (67.8)

In a section called "The qualifications and duties of Person in charge" of the LTTE manual, the following is indicated on page 18 under the heading "The Branch-in-charge personnel":

"Compose the monthly activity report for the Branch and submit before the 10th day of the following month."

I believe this report shows that the WTM follows the instruction set out in the LTTE manual and that CHANDRASEGARAM, co-owner of the building at 4160 and 4162 Van Horne, is an active member of the WTM.

214. An electronic document found in a USB key seized at 7720 Pie-IX Boulevard, unit 5 refers to the number of martyrs who died as Black Tigers. The translation of the document is as follows:

Details	Male	Female	Total
The inland Black Tigers	61	18	79
The Sea Black Tigers	135	51	186
The total of Black Tigers	196	69	265
The Heroes of auxiliary forces	274	5	279

The affectionate citizens who lost their lives until 31 - 03 - 2006

Affectionate citizens

Male 413

Female 21

Total 434

At the Heroes office

Signature: A. Pon Thiyagam

The chief servant

The Heroes' secretariat of Tamil Eelam

Political Division

The Liberation Tigers of Tamil Eelam

Tamil Eelam

This information was obtained from my review of the translated document obtained from the USB key seized at 7720 Pie IX Boulevard, unit 5, Montreal (67.11); and from page 1 of Cpl. CLOUTIER's report dated October 10th, 2006. (67.10)

10.1.9 15th Anniversary of the "TRO" - October 7th, 2006

215. The Tamil Rehabilitation Organization ("TRO") was formed in 1985. Regarding its necessity, PRABHAKARAN the leader of the LTTE explained: "People of Tamil Eelam are facing two battle fronts. One front is the liberation of our homeland from the invading Sinhalese armed forces. The other front is the reproduction of food to counter the tyrannical economic blockade of the Sinhalese chauvinistic government. Just as the heart regulates the blood circulation and helps the body to conquer diseases, so also should increase the food production which is the life-blood and foundation for the final victory of Tamil people."
This information was obtained from researching the Internet on page 24 of an article entitled: "Velupillai PIRABAHARAN: a profile" by WTM, published on the www.tamilnation.org website. (10.3)
216. The mission of the TRO is to provide much needed relief, rehabilitation and development for the people of the North-East of Sri Lanka. The headquarters of the TRO is located in Kilinochchi, Sri Lanka which is within the area controlled by the LTTE. The organization also has an office in the Sri Lankan capital, Colombo.

This information was also obtained from Internet research done by Ms. BERNARD as referred to in her report dated November 6th, 2006 (68.1); from the www.troonline.org website (68.2); and from the www.trocanada.org website (68.3).

217. The Central Bank of Sri Lanka has pressured the various commercial banks in Sri Lanka to freeze all the accounts of the TRO. According to the TRO, the amount held by the Central Bank is approximately \$750,000 US. According to a press release by the Sri Lankan Ministry of defence, the bank accounts were cancelled and seized because the TRO is suspected of assisting the military activities of the LTTE.
This information was obtained from Internet research done by Ms. BERNARD on www.troonline.org, as referred to in her report dated November 6th, 2006. (68.1)
218. Foreign LTTE activists attending the training with the International Secretariat in Sri Lanka were taken on a field trip to visit the head office of the Tamil Rehabilitation Centre in the town of Kilinochchi.
This information was obtained from a review of the document titled *The Workshop for the Foreign Activists, seized at 7720 Ple IX Boulevard, unit 1, Montreal. (33)*
A check of the website address www.trocanada.org shows that the TRO head office is located at 254 Jaffna Road, in Kilinochchi. Therefore, I believe that the Tamil Rehabilitation Centre visited by the activists is in fact the TRO. (68.3)
219. The TRO (Canada) is registered since 1995 in the Province of Ontario as a no-capital company, Ontario corporation #1126956. The office of the TRO is located at 2390 Eglinton Avenue East, Suite 203A, Toronto, Ontario.
This information was obtained from Mr. RONDEAU, as referred to in his report dated December 30th, 2004 (68.6); from Cpl. BOUDREAU's report dated April 5th, 2005 (68.7); and from the Ontario Corporation Profile Report obtained by Cpl. DUBREUIL by e-mail on February 2nd, 2009. (68.8)
220. In a letter dated June 1st, 2006, the Canada Customs and Revenue Agency ("CCRA") advised the President of TRO Canada that their application as a registered charity was denied. In its concluding remarks, the CCRA mentions among the reasons for the refusal that:
- TRO (Canada) appears to function as a fundraising agent for its parent organization TRO (Sri Lanka);
 - TRO (Canada) appears to operate within the overall structure of the LTTE;
 - And TRO (Canada) has not demonstrated with any reasonable degree of certainty that the organization operates exclusively for charitable purposes and activities.

In order to come up to its final decision, CCRA refers to many sources of information such as websites, the Immigration and Refugee Board of Canada as well as Human Rights Watch reports.

This information was obtained from a CCRA report dated June 1st, 2006, found on the *National Post* website on March 30th, 2009. (133)

221. A cultural event was organized by the TRO on October 7th, 2006, to commemorate its 15th anniversary. Advertisement posters were distributed in the Montreal Tamil community announcing this event to be held at Marie Anne School, located at the corner

of Sauvé Street and St-Laurent Boulevard, Montreal. The posters advised that the TRO was responsible for this event and supplied 4 telephone numbers for contacts. One of these phone numbers, (514) [REDACTED], given by the TRO in Montreal is registered to SIVARAMAN of [REDACTED]. SIVARAMAN is the co-owner of 4160-4162 Van Horne Avenue, Montreal.

This information was obtained from Informant [REDACTED] as referred to by [REDACTED] in his report dated [REDACTED], 2006 (127.3); and from Cpl. BOUDREAU's research and verification as referred to in his report dated October 13th, 2006. (127.4)

222. SIVARAMAN is a representative of the TRO in Quebec.
This information was obtained from Informant [REDACTED] as described in [REDACTED] report, dated [REDACTED], 2006. (134)
223. The school premises, for the October 7th, TRO event, were rented in the name of the Thamilar Olli Association of Montreal. The rental agreement with the school board was signed by an activist of the WTM, Ravindrarajah SANGARAPILLAI. The address for the Thamilar Olli Association is 7290 Hutchison Street, unit 504, Montreal.
This information was obtained from Cpl. BOUDREAU's investigation report dated October 3rd, 2006 (128.1); and from a query I conducted on CIDREQ. (38.19)
224. On November 15th, 2007, the U.S. Department of the Treasury designated the TRO as a proscribed entity under the executive order 13224 - blocking property and prohibiting transactions with persons who commit, threaten to commit, or support terrorism. The U.S Department of the Treasury also named the Canada branch of the TRO at 2390 Eglinton Avenue East, unit 203A, Toronto, Ontario, in their list.
This information was obtained from the Department of the Treasury of the United States Internet website at www.treas.gov. (68.4, 68.5)

10.1.10 Local fundraising events associated to the WTM and LTTE

225. The LTTE Operations Manual dictates the following guidelines in section 1-1-3 in regards to the "Important events of Tamil Eelam":

"The personnel in charge for propoganda activities must emphasize the clear understanding of the impotency to Tamil Eelam within the events and performances in producing and staging by the creative art club, by the woman's federation and by educational institutions."

This information was obtained from the LTTE Operations Manual, section 1-1-3, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

Examples of cultural events will be shown later in this Affidavit, mostly in the fundraising section.

10.1.11 Exhibitions and Special publications

226. The LTTE Operations Manual dictates the following guidelines in regards to the "Exhibitions and special publications":

"The exhibitions must provide the actual concept (fairness) of our freedom struggle. For that reason and to explain the history of our freedom struggle, exhibit pictures, drawings and for viewing, televise the victories of our battles."

"When speaking about the special publication, and to be known about our battle, according to the specific countries: produce and give out watches, stickers, and other articles of souvenirs."

This information was obtained from the LTTE Operations Manual, section 1-1-4, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

227. The following items were seized at 4160 Van Horne Avenue, Montreal on April 12th, 2006:

- 29 hats with the embedded LTTE logo;
- 76 shirts and t-shirts with the logo of the LTTE;
- 65 posters of the LTTE leader, PRABHAKARAN;
- 222 framed photos of PRABHAKARAN;
- 2 coffee mugs with the LTTE logo;
- 206 books with a picture of PRABHAKARAN;
- 1677 different types of multi media paraphernalia (CD, VHS, DVD and audio cassettes) were found. The majority (1531) of these items are related to the LTTE, by having pictures, writing or logo's linked to the LTTE. The other 146 have no links to the LTTE.

The above mentioned items were seized at different locations inside 4160 Van Horne, Montreal as seen on the exhibit report of 4160 Van Horne Avenue, Montreal (Appendix 1); and from Cst. MADORE's Investigative report, dated January 22nd, 2008. (70)

228. On September 3rd, 2008, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. Some of the items seized include:

- A 2008 calendar with the leader PRABHAKARAN's picture on it. The calendar shows the date April 11th, 2008, which corresponds with the date that the building was restrained with Order #DES-9-08 granted April 10th, 2008. The calendar has the LTTE logo in the bottom right corner and is published by "The Publication Division International Secretariat Tamil Eelam".
This information comes from my review of exhibit 2008-11, item K293. (Photo 38)
This calendar was exhibited in plain view near the main desk on the first floor.
- Other items include: 146 photographs of PRABAKHARAN and or LTTE; 439 posters and signs; 359 audio cassettes; 49 flags; 21 hats and t-shirts; 110 stickers, pins, cups, key rings and clocks; and 1089 books, magazines and newspapers.
This information was obtained from the report of investigative assistant Mrs. JACQUES dated February 7th, 2009. (125)

10.1.12 Political contacts

229. In the "goal of the activities for foreign branches" section of the LTTE Operations Manual, the LTTE dictates the following:
"Engage in political and friendly level contacts with structures such as: foreign governments, liberation organizations, non governmental institutions, human rights organizations, political parties, and trade unions."

Furthermore, in paragraph 1-2-4 of the LTTE Operations Manual, the LTTE dictates the following:

"Establish contacts with the local municipal councils' members, the parliamentarians, the ministers and with the ministry of foreign affairs, provide them with information supporting the opinions about the freedom struggle for our motherland and provide them with the simultaneous opinion of the political situations. If necessary, communicate with the International Secretariat, to obtain guidance."

This information was obtained from the LTTE Operations Manual seized at 7720 Ple IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

As previously mentioned in this Affidavit, some of the Canadian political figures have been seen at the Martyr's Day event.

230. A letter addressed to V. MANIVANNAN, the representative for the International Secretariat, was located at 4162 Van Horne Avenue, Montreal, during the execution of the Search Warrant on April 12th, 2006. This letter was from CHANDRASEGARAM. The letter describes the 15th annual athletic meet in August 2005. In the second paragraph of the letter, there is the honourable mention of the guest, the mayor of the NDG Borough, Mayor APPLEBAUM. The letter states that Mayor APPLEBAUM, amongst other things, distributed awards to the winners.

This information comes from the translation of the letter seized in a box at 4162 Van Horne, Montreal. Police exhibit 2006-12 item 1, 27/28. (37.3)

This letter also makes reference to SITHAMPARATHAN and describes him as "Iyyah", the leader of the WTM. Although THURAIRATNAM replaced MANIVANNAN as leader in 2005, I believe that the designation in this letter of "Iyyah" leader of the WTM is more a respectful indication of the leadership that SITHAMPARANANTHAN, the WTM president, has inside the WTM.

231. Under a hyperlink dated October 21st, 2004, photographs of a ceremony held at 4160 Van Horne Avenue, Montreal, were posted on the Internet website www.tamilnaathan.com. Among the pictures seen, the Mayor of the Côte-des- Neiges and Notre-Dame-de-Grâce borough, Mayor APPLEBAUM, was observed while he was attending the ceremony. WTM members and associates appeared on some of those pictures, notably:

- KARUNANANTHASWAMY;
- CHANDRASEGARAM;
- SIVARAMAN;
- ANTONY;
- SANGARAPILLAI;

➤ and BALENDRA.

This information was obtained from Sgt. HAMEL's report dated April 8th, 2005. (55.5) (photo 29)

232. With respect to SIVARAMAN's participation in the unveiling of the monument, SIVARAMAN can be seen on several pictures both inside the WTM and outside, during the flag raising ceremonies.
This information was obtained from Sgt. HAMEL's investigative report dated December 19th, 2007 (136.2); and from photographs obtained from the website www.tamilnaathan.com. (photo 29)
233. Furthermore, not only has SIVARAMAN participated in this ceremony, he was also an integral part in building the said monument. During a surveillance operation on June 15th, 2004, members of the RCMP Special O surveillance team observed SIVARAMAN and two other unidentified males attend a Home Depot store on St-Antoine in Montreal where they rented a cement mixer and purchased some cement glue. SIVARAMAN was then seen working on the monument in front of 4160-4162 Van Horne. This is the same monument that bears the name World Tamil Movement and supports three flag poles, one of which is the LTTE flag.
This information was obtained from a surveillance report by Constable François LEBEL dated June 15th, 2004 (136.1); and from Sgt. HAMEL's investigative report dated December 19th, 2007. (136.2)
234. On February 26th, 2008, Cpl. BOUDREAU and Cst. MANCINI interviewed Mayor APPLEBAUM in regards to events which he participated in at the WTM. The interview took place at the Mayor's office located at 5160 Decarie Boulevard, unit 710, Montreal. Mayor APPLEBAUM confirmed attending some of the events prepared by the WTM, he also had different WTM documents requesting his participation to different activities or financial assistance. Mayor APPLEBAUM provided the RCMP members with the documents.
This information was obtained from Cst. MANCINI's report, dated February 26th, 2008. (75)
235. The WTM has a sub-organization called Canadian Tamil Congress (CTC) and is led by BALENDRA. This organization of the WTM was registered with the Quebec Enterprise Registrar on December 28th, 2001, as an association. The address given was 3810 Rachel East Street, Montreal. The association declared its primary activities as follow: "Diplomatic arm of Tamil people to local & international government & organization to assist Quebec Tamil community in their social, economic & cultural conditions." After failing to submit its annual report to the government, the CTC was struck off the CIDREQ list as an association on May 6th, 2005. On April 25th, 2006, the organization applied to regain its status as an association which was granted again on June 1st, 2006. BALENDRA is listed as the president/administrator for the association.
This information was obtained from a CIDREQ verification done on March 30th, 2009. (38.18)
Less than two weeks after the LTTE was listed as a terrorist group, the CTC applied to regain its status as an association.
THURAIRATNAM's address is [REDACTED]
236. BALENDRA and another member of the WTM participated in a press conference on

April 28th, 2006, to defend publicly the WTM following the RCMP searches of their offices in Montreal. She identified herself as being from the CTC of Quebec. They claimed that the WTM does not support directly or indirectly the LTTE. BALENDRA also confirmed that they support non-governmental organizations such as the Tamil Rehabilitation Organization (TRO) and the Social and Economical Development Organization for Tamils. As previously mentioned in this Affidavit, on November 15th, 2007, the U.S. Department of the Treasury designated the TRO as a proscribed entity under the executive order 13224 blocking property and prohibiting transactions with persons who commit, threaten to commit, or support terrorism.

This information was obtained from a newspaper article obtained on www.tamilcanadian.com, titled "We don't give money to the Tigers, Tamil community leaders say" from The Gazette, written by Jeff HEINRICH and dated April 29th, 2006 (12.4); and from the Department of the Treasury of the United States internet website at www.treas.gov. (68.4, 68.5)

237. On April 12th, 2006, during the search of 4162 Van Horne Avenue, Montreal, an income statement of the New Year Gala Dinner of May 1st, 2004, was located. This report is printed with the letterhead of the Canadian Tamil Congress (Quebec). The report lists the revenues, the expenses and profits for the Gala Dinner. The document states that the Dinner took place at the Days Inn. The net income identified is \$168.77.
This information was obtained from my review of a document seized at 4162 Van Horne Avenue, Montreal. (129.2)

I believe that the fact that the income statement was located in the accounting books of the WTM demonstrates that the WTM controls the finances of the CTC. I believe the CTC to be a sub-organization of the WTM.

238. On December 1st, 2007, members from INSET conducted surveillance during the Martyr's Day celebration at the "Centre d'éducation des adultes Outremont", located at 500 Dollard Street, Montreal. In attendance was the Conservative candidate for the Quebec riding of Laprairie/Brossard, Mr. BROSSARD. At this event, Mr. BROSSARD gave a speech to the Tamil community who attended the Martyr's Day celebration. A video of PRABHAKARAN giving a speech was also shown during the festivity. Also present at this event were:

- MANICKAM
- SITHAMPARANATHAN

This information was obtained from Cst. MANCINI's investigative report, dated December 5th, 2007. (64)

239. On September 3rd, 2008, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal, and seized an electoral publicity board for Pierre BOURQUE.

This information comes from a review by Cpl. DUBREUIL of exhibit 2008-11, item Y73. (Photo 36)

Pierre Bourque was the mayor of Montreal, Quebec from 1994 to 2001. He attempted to enter provincial politics in 2003 but was defeated. He returned to municipal politics, but lost for a second time to incumbent-mayor Gérald Tremblay on November 6th, 2005.

240. The LTTE Operations Manual dictates the following guidelines in regards with the Publication Division:

"In each country, within the structure of the branch, create a Publication Division and through this division publish the publications";

"Of that specific country's publications with regard to our freedom struggle, this Publication Division must keep a file of record";

"Maintain a contact with the publication unit in France and receive the necessary copies of publications, by making the payments immediately or in advance for those publications. Provide the necessary help and support to the central publication unit to function";

"Prepare and publish the hand bills and posters for the events that will take place through the branches of that specific country".

This information was obtained from the LTTE Operations Manual, section 1-3, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

241. On April 11th, 2006, investigators seized numerous items from a recycling centre at 6925 Chemin Côte-des-Neiges, Montreal, including:

➤ 41 invoices from the WTM which have the following header on them: "WTM Vanikam", the address "39 Cosentino Drive Scarborough, Ontario. These invoices are made out to local Montreal businesses which have bought ad space in the directory. The following is also written at the bottom of each invoice: "Please make cheque payable to WTM";

This information was obtained from the seizure at the recycling bin on April 11th, 2006. (71.1)

The address 39 Cosentino Drive Scarborough, Ontario is the address for the Toronto WTM.

This information was obtained from Ms. BERNARD's report, dated November 7th, 2006. (72)

Vanickam are local business reference directories (similar to yellow pages) destined for the Tamil community.

➤ 23 invoices from "Eelamurasu Publication and Printers" located at 2380 Eglinton Avenue East, unit 230 Toronto, Ontario. These invoices are also in reference to ads from Montreal area businesses;

This information was obtained from the seizure at the recycling bin on April 11th, 2006. (71.1)

➤ One postal waybill from France. The expediter on the waybill is "Imprimerie" located at 3 Bis rue du Pont Baille, Mont Sault, France. The postal parcel linked to the waybill is addressed to WTM at 4160 Van Horne Avenue, Montreal. The description of the postal parcel says that it contains 50 magazines weighing 6 kilos. The date is handwritten as being "4/5/05".

This information was obtained from the seizure at the recycling bin on April 11th, 2006. (71.2)

The LTTE Operations Manual states to: "Maintain a contact with the publication unit in France". I believe that the WTM follows the guidelines of the LTTE, since a postal waybill from a publication company in France was located in the items seized from the recycling bin.

In addition, it is interesting to note that the members of the WTM got rid of these items after the LTTE was listed as a terrorist group on April 8th, 2006.

242. On April 12th, 2006, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal, and seized the following items:
- A copy of a fax dated February 20th, 2005, from the Toronto WTM at 39 Cosentino, Scarborough, Ontario. The copy of the fax is an invoice for 600 "rec. book" for a total of \$1,774.45;
This information comes from the faxed invoice seized at 4162 Van Horne, Montreal, exhibit 2006-12, item 01, 22/28. (73.2)
 - Literature promoting PRABHAKARAN;
This information comes from the magazines seized at the WTM at 4160 Van Horne Montreal. Police exhibit 2006-11 Item 84. (78.1)
 - Literature titled "PRABHAKARAN, A leader for all seasons". The cover of the books contains photos of PRABHAKARAN and LTTE soldiers;
This information comes from the books seized at the WTM at 4160 Van Horne Montreal. Police exhibit 2006-11 Item 72. (78.2)(photo 37)
 - A large amount of VHS, CD's and DVD's that promote the LTTE and have the photo of PRABHAKARAN on them.
This information comes from the items seized at the WTM at 4160 Van Horne Montreal: exhibit 2006-11 item 3 (photo 30); item 2 (photo 31); and item 25 (photo 32).
243. On September 3rd, 2008, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. Investigators seized eight full boxes of Vanikam business directories. Inside the directories, we find on adjacent pages a picture of the LTTE flag while on the opposite page is a picture of the Canadian flag.
This information comes from a review by Cpl. DUBREUIL and subsequent translation of exhibit 2008-11, item J145. (Photo 33)

10.2 Fundraising

244. The LTTE Operations Manual dictates the following as a goal of the activities for foreign branches:

"Raise necessary funds for the liberation struggle."

This information was obtained from the LTTE Operations Manual, seized at 7720 Pie IX Boulevard, unit 1. (32)

245. The LTTE Operations Manual dictates the following guidelines in regards to Fundraising from the public.

"Make all necessary steps to receive monthly financial donations from each one of the Tamils of those who are living in every country. These donations may be received through banks or in person."

"The monthly financial collections will be made through the in-charge personnel, in-charge personnel for finance, regional in-charge personnel and through the in-charge personnel of the volunteer organizations."

"If monthly financial collection proceeds correctly, a large fundraising campaign shall be abandoned. However, under the special fundraising campaign, the following may take place":

- I) "By charging a fee to entertain the public through music, dance, drama and sports events to help raise funds."
- II) "By conducting the intellectual exhibitions, liberation battle exhibitions, and Tamils' ancient history exhibitions will wake up the public and it will be easier to raise funds."
- III) "By publishing the delighted reading for people in minor publications of liberation battles, histories of Tamils, and on intellectual readings will wake up the public and it will be easier to raise funds."

"Consequently, when there is a special fundraising campaign, according to the necessity to proceed with the fundraising, the personnel in charge for finance must get help from the auxiliary organizations."

This information was obtained from the LTTE Operations Manual, section 2, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

The following pages will demonstrate that through a number of fundraising methods the WTM fulfills the second main objective of the LTTE Operations Manual which is to raise funds from the public, the first one being Propaganda and Media, as seen in subsection 10.1.

10.2.1 Bank Accounts of the WTM

The WTM TD bank account #4336-0928569 (account sought to be forfeited)

246. The WTM has an active commercial bank account #4336-0928569 held at the TD Canada Trust Bank located at 8200 Decarie Boulevard, Montreal. This is the primary bank account of the WTM which was opened on May 24th, 1994. At that time, the WTM administrators were the following:

- President: SITHAMPARANATHAN KATHIRAVELUPPILAI;
- Secretary: THURAIRAJAH AMUTHAKUMAR;
- Treasurer: ANTON MANICKAM.

The WTM TD bank account #4336-0928569 required two signatures to make a transaction. The co-signers named by the WTM were MANICKAM and AMUTHAKUMAR.

This information was obtained from the banking records of the WTM held at the TD Canada Trust pursuant to Search Warrant #500-26-032700-043. (86.4)

247. On May 4th, 1999, the WTM subscribed to an Electronic Funds Transfer Debit Service ("EFT") with the TD Canada Trust Bank. This service is an electronic collection system provided by all Canadian chartered banks. The EFT service permits the WTM to collect pre-authorized payments from the accounts of any individual or company at its financial institution in Canada. The WTM designated MANICKAM to be their administrator for the EFT service.
This information was obtained from the banking records of the WTM held at the TD Canada Trust pursuant to Search Warrant #500-26-032700-43. (86.3)
248. On September 7th, 2004, the WTM advised the TD Canada Trust Bank of a change with one of its administrators having signing authority on the WTM TD bank account #4336-0928569. The WTM advised the bank in writing that Thurairajah AMUTHAKUMAR was replaced by KARUNANANTHASWAMY as co-signer of the WTM TD bank account #4336-0928569 at the TD Canada Trust Bank. An account signing authority enquiry done on November 15th, 2004, shows that KARUNANANTHASWAMY and MANICKAM are the two authorized signees.
This information was obtained from the banking records of the WTM held at the TD Canada Trust pursuant to Search Warrant #500-26-032700-43. (86.1) (86.2)
249. On November 15th, 2005, the WTM advised the TD Canada Trust Bank of a change with one of its administrators having signing authority on the WTM TD bank account #4336-0928569. The WTM advised the bank in writing that KARUNANANTHASWAMY was replaced by SITHAMPARATHAN as co-signer of the WTM TD bank account #4336-0928569 at the TD Canada Trust Bank.
This information was obtained from the banking records of the WTM held at the TD Canada Trust pursuant to Production Order #500-26-043253-073. (106.1)
250. As of March 14th, 2008, the balance in the WTM TD bank account #4336-0928569 is \$4,330.02
This information was obtained from the documents obtained from the TD Canada Trust on March 17th, 2008, exhibit 2008-06. (79.3)
251. On April 11th, 2008, the TD bank account was restrained pursuant to Order #DES-9-08 issued on April 10th, 2008, by a Federal Court Judge, the Honourable Mr. Justice François Lemieux. Since that day, there has been no activity in the account.
This information was obtained from restraint Order #DES-9-08 issued on April 10th, 2008. (23.15)

The Laurentian bank account #49255-3-01

252. On October 5th, 2004, the WTM opened a commercial account number #49255-3-01 held at branch #054 of the Laurentian Bank of Canada located at 4790 Van Horne Avenue, Montreal ("The Laurentian bank account #49255-3-01"). A \$25 administration fee was paid to the Laurentian Bank by the WTM to open the account. The Laurentian bank account #49255-3-01 activities started on October 13th, 2004, with a \$5,000 deposit. This is a secondary bank account for the WTM.
This information was obtained from a receipt of the Laurentian Bank of Canada seized at 4162 Van Horne Avenue, Montreal, exhibit 2006-12, item 01, 4/28 (118.4); from an account statement of the Laurentian Bank of Canada, dated from October 13th, 2004, to October 31st, 2004, seized at 4162 Van Horne Avenue, Montreal, exhibit 2006-12, item 8 (87.1); and from a Laurentian Bank deposit book seized at 4162 Van Horne on September 3rd, 2008, exhibit 2008-11, item F208 (photo 40).
253. On a WTM financial report, KARUNANANTHASWAMY is named as the person who paid the \$25 administration fee to open an account at the Laurentian Bank of Canada.
This information was obtained from a WTM financial report seized at 4162 Van Horne Avenue, Montreal. (118.5)
254. During the search of the WTM offices at 4160 and 4162 Van Horne Avenue, Montreal, on April 12th, 2006, the investigators seized the monthly statements for the Laurentian bank account #49255-3-01. The documents cover the transactions done on the account between October 13th, 2004, to November 30th, 2005.
This information was obtained from the accounts statements of the Laurentian Bank of Canada, dated from October 13th, 2004, to November 30th, 2005, seized at 4162 Van Horne Avenue, Montreal (87.1)
255. A review of the monthly statements for the Laurentian bank account #49255-3-01 held by the WTM was done by Isabelle GOURDEAU, CA, CFA, Forensic Audit and Accounting Representative with the Public Works and Government Services Canada ("Ms. GOURDEAU"). For the period of October 13th, 2004, to November 30th, 2005, a total of \$20,050 was deposited in the Laurentian bank account #49255-3-01 in three separate cash transactions: \$5,000 on October 13th, 2004; \$50 on October 21st, 2004; and \$15,000 on April 19th, 2005. The cheques issued from the Laurentian bank account #49255-3-01 and the cash withdrawals represent a total of \$11,669 for that time period. From this amount, \$9,500 was paid to SIVARAMAN as rent and city tax expenses.
This information was obtained from Ms. GOURDEAU, as referred to in her report dated January 22nd, 2007. (89)
As per the accounting report, there was no pre-authorized payment received into the Laurentian Bank account #49255-3-01.

10.2.2 WTM financial reporting documents

256. In the LTTE Operations Manual, specific directives are enumerated concerning the activist who is designated as the person in charge of finance. The LTTE consider the fundraising by the foreign branches as one of the most important task:

"Consider that the finance is the most significant to win the Tamil Eelam battle and proceed consequently". "Give careful consideration for the significance value of finance, seek for various opportunities for fund raising and importantly implement them".

Therefore, it recommends that the position of the person responsible for the finances should be occupied by a full time member. The LTTE Operations Manual also stipulates that the monthly income and expenditure statements must be forwarded to the International Secretariat before the 10th day of the following month.

This information was obtained from page 19 of the LTTE Operational manual seized at 7720 Ple IX Boulevard, unit 1, Montreal, on April 13th, 2006. (32)

I believe that the expression Tamil Eelam battle is in reference to the fight between the Sri Lankan government and the LTTE in Sri Lanka.

257. A number of monthly financial reports covering a period from May 2004 to January 2006 were seized from the office of the WTM at 4162 Van Horne Avenue, Montreal, on April 12th, 2006. These monthly financial reports were prepared by the person in charge of finance, namely MURALI. Each report contains the expenses and revenues of the WTM. All these reports were contained in a cardboard box located in the office of the WTM. These documents are subdivided into 28 groups held in duo tang binders or into packs held by ribbons. From these 28 groups of documents, a total of 20 were found to be financial reports of the WTM and/or supporting documents for a specific month period. These financial reports detail the monthly revenues and expenses for the WTM. It is presented in a simple spreadsheet format with five columns identified as follows: No. (Line)/ Details/ Income/ Expenditure/ Notes.

The following is a list of some of the documents found within the above described groups of documents identified as financial statement:

- #1/28: Document containing 31 WTM Tamil Eelam Construction fund certificates of pledge;
- #2/28: Document titled: "Sivakumar, Publication Division". It contained the document titled "The Workshop for the Foreign Activists";
- #3/28: Document titled: "MURALI person responsible Finance Division Quebec branch, Mr. ADHI Coordinator- Canada Branch, financial statement for the month of December 2004"; (100.1)
- #4/28: Document titled: "MURALI person responsible, Finance Division Quebec branch, to the person responsible, financial statement for the month of November 2004"; (118.1)
- #5/28: Document titled: "MURALI person responsible, Finance Division Quebec branch, to the person responsible, financial statement for the month of October 2004"; (99.7)
- #6/28: Document titled: "MURALI person responsible, Finance Division Quebec branch, to the person responsible, financial statement for the month of September 2004"; (84.1)

- #7/28: Document titled: "MURALI person responsible, Finance Division Quebec, Revenue and Expenses statement for the month of August 2004"; (113.1)
- #8/28: Documentation in relation to the Tamil language competition of August 2004; (112.1)
- #9/28: Document titled: "MURALI person responsible, Finance Division Quebec, Revenue and Expenses statement for the month of July 2004"; (46.1)
- #10/28: Document titled: "MURALI person responsible, Finance Division Quebec, Revenue and Expenses statement for the month of June 2004";
- #11/28: Document titled: "Financial statement for the month of May, Organization: World Tamil Movement of Montreal, Telephone: (514)963-1944, Person responsible: Gobu, Period: May 2004"; (129.1)
- #12/28: Documentation in relation to donators of the tsunami help fund 2004;
- #13/28: Document titled: "Financial statement for the month of November 2005"; (102.1)
- #14/28: Document titled: "Six months financial reports from the month of May to October 2005"; (101.1)
I believe that this report was prepared to cover a six months period as no monthly reports were done for that period.
- #15/28: This group of documents is in a duo tang binder with the handwritten inscription "Sep-2005" and contains the supporting financial vouchers for the financial statement for the month of September 2005;
- #16/28: This group of documents is in a duo tang binder with the handwritten inscription "August 2005" and contains the supporting financial vouchers for the financial statement for the month of August 2005; (116.1)
- #17/28: This group of documents is in a duo tang binder with the handwritten inscription "July - 2005" and contains the supporting financial vouchers for the financial statement for the month of July 2005; (105.1)
- #18/28: This group of documents is in a duo tang binder with the handwritten inscription "June - 2006" (*I believe this is a typo mistake as it should be 2005*) and contains the supporting financial vouchers for the financial statement for the month of June 2005; (115.1)

- #19/28: This group of documents is in a duo tang binder with the handwritten inscription "May - 2005" and contains the supporting financial vouchers for the financial statement for the month of May 2005;
- #20/28: Document titled: "MURALI, Person responsible, Finance Division Quebec branch Mr. ATHI Canada branch, financial report for the month of April". This report and its supporting documents were found in a duo tang binder marked April 2005;
- #21/28: Document titled: "MURALI, Person responsible, Finance Division Quebec branch Mr. ATHI, Coordinator, Canada branch, financial report for the month of March". This report and its supporting documents were found in a duo tang binder marked March - 2005; **(135.1)**
- #22/28: Document titled: "MURALI, Person responsible, Finance Division Quebec branch, Mr. ATHI Coordinator-Canada branch, financial report for the month of February". This report and its supporting documents were found in a duo tang binder marked February - 2005; **(73.1)**
- #23/28: Document titled: "MURALI, Person responsible, Finance Division Quebec branch, Mr. ATHI Coordinator-Canada branch, financial report for the month of January". This report and its supporting documents were found in a duo tang binder marked January - 2005;
- #24/28: This group of documents contains a handwritten version of the financial report for May to October 2004 and the typed version of the monthly financial report for the months of May 2004 to January 2006. These versions do not have their respective supporting financial vouchers;
- #25/28: Documentation in relation to the The Tamil Eelam Economic Development Organization ("TEEDOR") contracts, which will be explained in paragraph 10.2.6; **(85.1)**
- #26/28: Computer spreadsheet concerning the Pre-Authorized Payment Plan, which will be explained in paragraph 10.2.3;
- #27/28: Financial documentation including wire transfer forms which will be explained in section 11; **(37.1)**
- #28/28: Documentation in relation to the funeral of a Montreal Tamil resident. **This information was obtained from Cpl. BOUDREAU's Investigative report, dated March 20th, 2008, and from my review of the said documents. (90)**
*I believe that MURALI is Muralee Karan THURAIRATNAM.
 Only the binders used as supporting exhibits in this Affidavit have been identified with a reference.*

258. The first monthly financial report of the WTM is dated May 2004. It appears to be the first report as no opening balance is reported. It is not known what reporting format the WTM was using prior to May 2004. The financial reports of the WTM were reviewed by Ms. GOURDEAU which she describes as monthly cash flow statements. **This information was obtained from section 5 and appendix 1 of Ms. GOURDEAU's report dated January 31st, 2008. (83)**
259. Also located with these reports, were "Financial Receivable Forms" and "Payment of Finance Forms". Both of these accounting vouchers have the WTM heading with its address and phone number for their office at 4160 Van Horne Avenue, Montreal. The "Financial Receivable Form" has been used to record cash inflow from its various methods of fundraising and from its sub-organizations. The "Payment of Finance Form" has been used to record any cash outflow related to the operation of the WTM. **This information was obtained from section 5 and exhibits 2 and 3 of Ms. GOURDEAU's report dated January 31st, 2008. (83)**

10.2.3 Fundraising method 1 – Pre-Authorized Payment Plan called Electronic Fund Transfers "EFT"

260. On the island of Sri Lanka, the LTTE controls a certain territory that they relinquish in their separatist cause. They have established check points at certain places where they control the people who arrive or leave "their" territory. People who have entered LTTE territory through those check points describe it as a place similar to a customs office. This customs office is described as a modern building equipped with a computer system. Tamil people living outside Sri Lanka who visit the area are stopped at this checkpoint and asked questions about their participation in the financing of the LTTE. LTTE members have access to a computer databank to determine if the person has made contributions to the WTM. Any person found not to have made contributions to the LTTE through the WTM is coerced into signing a document promising monthly donations to the LTTE. The document is titled Pre-Authorized Payment Plan - Form of Authorization. **This information was obtained from Informant [REDACTED] as referred to by [REDACTED] in his report dated [REDACTED], 2004. (127.2)**
261. In a March 14th, 2006, Human Rights Watch report entitled "Funding the final war LTTE Intimidation and extortion in the Tamil diaspora", it states on page 30:
- "Some people also provide funds because they have family or property in Sri Lanka and fear negative repercussions against family members or even confiscation of their property if they do not give. They also often want to maintain their ability to visit their families without encountering problems from the LTTE. Some Tamils are told that if they do not pay funds to the LTTE, they will not be allowed to return to Sri Lanka or will have "trouble" when they do. In other cases, the LTTE suggests that a refusal to give money will put family members in Sri Lanka at risk."
- This information was obtained from the Human Rights Watch report, Volume 18, No.1 (C). (26.3)**
262. Those authorization forms are subsequently sent to the WTM who will have the

responsibility of collecting the promised amount. KARUNANANTHASWAMY was personally responsible for collecting the promised contributions signed by returning Tamil tourists. There were approximately 150 names on his collection list. KARUNANANTHASWAMY received the authorization forms on a regular basis from the LTTE in Sri Lanka and had the mandate to enforce the collection.

This information was obtained from Informant [REDACTED] as referred to by [REDACTED] in his report dated [REDACTED], 2004. (127.2)

263. KARUNANANTHASWAMY and CHANDRASEGARAM have been visiting Tamil people in Montreal in order to collect from the persons who signed the Pre-Authorized Payment Plan forms mentioned above and also to collect from those who are reluctant contributors.

This information was obtained from Informant [REDACTED] as referred to by [REDACTED] in his report dated [REDACTED]. (127.2)

Informant [REDACTED] knows of one individual [REDACTED] Pre-Authorized Payment Plan - Form of Authorization while [REDACTED] travelling to Sri Lanka. Since returning to Canada, [REDACTED] in order to collect the amount promised to the LTTE.

264. The information provided by Informant [REDACTED] corroborates the Humans Rights Watch report as mentioned in page 35, stating: "Alternatively, they may be pressured to sign a pledge to pay a monthly amount once they return home".

This information was obtained from a Human Rights Watch report, Volume 18, No 1 (C) (26.3)

265. On November 12th, 2004, a Search Warrant was granted by Justice of the Peace Gilles MICHAUD in Montreal. The authorization was to obtain from the CBSA copies of all the documents pertaining to the customs verification of CHANDRASEGARAM on September 11th, 2004, upon his return from Sri Lanka. Amongst the numerous documents in CHANDRASEGARAM's possession, the customs inspector located 119 forms from a master copy titled Pre-Authorized Payment Plan - Form of Authorization. These "legal" forms have handwritten information in the "fill out" sections including a name, address, telephone number and banking information of persons with addresses in Canada. Amounts ranging between \$20 to \$50 dollars were written on each form. The form itself was to be addressed to a particular banking establishment referred to as the "Drawee". The account holder is referred to as the "Payee". The form represents an agreement by the account holder to have a specified amount withdrawn from his or her bank account. Each form also has notes handwritten in Tamil. The notes were translated and found to be instruction written by a third person stating that the person who signed the form promises to have a set amount taken from his bank account on a monthly basis.

This information was obtained from Cpl. BOUDREAU's Investigative report, dated November 23rd, 2004. (76.1)

266. A review of the 119 Pre-Authorized Payment Plan forms mentioned above was made [REDACTED] were identified as having name and address of persons in the Montreal area. The balance of the forms referred to persons living in the Toronto area. Each form is entitled Pre-Authorized Payment Plan - Form of Authorization. The form is reproduced below to provide a sample of the completed forms:

**Pre-Authorized Payment PLAN
FORM OF AUTHORIZATION**

TO: Name of Drawee's Financial Institution
(The "Drawee")

TO: User
(User)

You are hereby requested and authorized to pay and debit to the account of the undersigned mentioned below, whether it continues to be maintained at the branch below or is from time to time transferred to any other of the Drawee's branches or offices.

- (a) All cheques or order purporting to be drawn on the Drawee on behalf of the undersigned, or of any of the undersigned if more than one, and purporting to have been credited to the Payee and presented to the Drawee for payment, and
- (b) All amounts specified in debit slips or other media that, in either case are or purport to be directions to the Drawee to credit such amounts to the Payee and to debit such amounts to the said account. And the Payee is hereby authorized to draw and issued such cheques and orders and give such directions.

"Other media" as used in this letter means the data on a magnetic or computer produced paper tape that is written in accordance with regulations prescribed from time to time by the Canadian Bankers' Association. This authorization may be revoked on two days' written notice to the branch of the Drawee at which the said account is for the time being maintained.

In consideration of the Drawee acting as aforesaid, it is agreed that its rights with respect to the payment, debit and credit of the amount stated on the cheque or order or the amount specified in the debit slip or other media shall be the same as if such cheque, order or debit slip or other media were a written direction signed by the undersigned, or by each of the undersigned if more than one, personally authorizing and requesting the Drawee to pay and credit such amount to the Payee and to debit such amount in any such debit slip or in any such other media shall give rise to no liability on the Drawee's part if such failure results in a default in the fulfillment of any obligations of the undersigned or a forfeiture of insurance or loss or damage of any kind. Any delivery of this authorization to the Payee will constitute delivery by the undersigned to the Drawee as well as the Payee.

Delete the two of the below that are inapplicable:

- Current
- Personal Chequing
- Savings

Account standing in the name of

_____ (Print name(s) in which account stands in records of the Drawee)

now maintained at _____

(Name of branch where account is maintained)

Under No. _____

Date: _____ 200

Signature(s) of depositor(s) as

Shown in records of the Drawee

N.B. For a joint account, all the depositors must sign this authorization even though not all depositors may be required to sign cheques issues against such account.

Area Use Only

Name/Address: _____	Volunteer: _____
Phone #: _____	Area: _____
PIN#: _____	Notes: _____

This information was obtained from Cpl. BOUDREAU's investigative report, dated June 7th, 2005. (76.2) (76.3)

This blank form is a reproduction of the same one found on CHANDRASEGARAM upon his return to Canada at the Pierre-Elliott TRUDEAU airport on September 11th, 2004.

267. On September 3rd, 2008, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. Investigators seized a binder containing Pre-Authorized Payment Plan forms filled out by individuals, some dated in 1992. These forms are accompanied by void cheques.

This information comes from a review by Cpl. DUBREUIL and subsequent translation of exhibit 2008-11, item K297. (Photo 39) (Warrant 23.18)

This exhibit shows that this fundraising method has been ongoing for many years.

10.2.3.1 Procurement of WTM banking records

268. On November 9th, 2004, Search Warrant #500-26-032700-043 was granted to obtain copies of the banking documents relating to the WTM TD bank account #4336-0928569 held at the TD Canada Trust. The documents requested from the bank covered the period of February 2003 to November 2004.

This information was obtained the Warrant to search #500-26-032700-043 granted by Justice of the Peace Gilles MICHAUD on November 9th, 2004. (23.2)

269. On January 3rd, 2006, a Production Order by Justice of the Peace PAUL BENTLEY of the Province of Ontario was granted to Corporal DeAnna HILL ("Cpl. HILL") of the Toronto INSET, to obtain copies of the banking documents relating to the numerous accounts held by the Toronto WTM and more specifically the WTM TD bank account #4336-0928569. The documents requested from the bank covered the period of July 9th, 2002, to December 30th, 2005.

This information was obtained from the Production Order granted by Justice of the Peace PAUL BENTLEY on January 3rd, 2006, in Toronto. (23.4)

270. On February 21st, 2007, Production Order #500-26-043253-073 was granted to obtain copies of the banking documents relating to the WTM TD bank account #4336-0928569 held at the TD Canada Trust. The documents requested from the bank covered the period of December 2005 to February 2007.

This information was obtained from the Production Order #500-26-043253-073 granted by Justice of the Peace Gilles MICHAUD on February 21st, 2007. (23.9)

271. On March 17th, 2008, Production Order #500-26-048605-087 was granted to obtain copies of the banking documents relating to the WTM TD bank account #4336-0928569 held at the TD Canada Trust. The documents requested from the bank covered the period of February 17th, 2007 to February 14th, 2008.
This information was obtained from the Production Order #500-26-048605-087 granted by Justice of the Peace Gilles MICHAUD on March 14th, 2008. (2.17)
272. A review of the documents obtained from the TD Canada Trust in Montreal confirmed that the WTM has been using the EFT Debit Service to collect funds from Tamil persons in the Montreal community since May 4th, 1999. This banking service subscribed to by the WTM at the TD Bank permits the collection of pre-authorized payments from the donor's bank accounts on a monthly basis. The WTM supplies the TD Canada Trust Bank with the pre-authorized payment information from the donors and the payment schedule is organized by the bank. The donation amount is then debited from the donor bank account and credited to the WTM TD bank account #4336-0928569. The WTM is then supplied by the bank with a monthly report listing the transactions concerning the pre-authorized payments. Anton MANICKAM is listed as the WTM administrator of this program. The WTM was still using this banking service to collect funds in support of the LTTE as of February 2008.
This information was obtained from Cpl. BOUDREAU's report dated May 9th, 2005 (86.7); from Cpl. BOUDREAU's investigative report, dated March 17th, 2008 (79.1); and from my review of the TD Canada Trust report. (79.5)

10.2.3.2 Forensic accounting reports

273. I have reviewed a forensic accounting report prepared by Ms. GOURDEAU, dated January 31st, 2008. This report outlines the revenue from the EFT program into the WTM TD bank account #4336-0928569.

"EFTs were the most important source of funds deposited in WTM's TD bank account from February 2003 to February 2007 representing about 82% of total deposits (total EFTs of \$244,140 on total deposits of \$297,627)."

This information was obtained from paragraph 4.1.1 of Mrs. GOURDEAU's report dated January 31st, 2008. (83)

The remainder of the total deposits (18%) comes from other deposits, cheque deposits, wire transfers and interest.

274. I have reviewed the transaction history for the WTM TD bank account #4336-0928569 for the period of March 2007 to February 2008. This report outlined the revenue from the Pre-Authorized Payment Plan program into the WTM TD bank account #4336-0928569. For that period, the WTM received a total of \$50,005 which was credited to its account at the TD Bank. This represents the funds collected by way of Pre-Authorized Payment Plan. Below as identified in the following table is the total amount of pre-authorized payment during the period of March 2007 to February 2008.

Electronic fund transfers WTM TD Bank Account #4336-0928569/ March 2007-February 2008			
Monthly	EFT's authorized (All the amounts authorized)	EFT's authorized (not credited to the WTM account because of insufficient funds or account closed or payment stopped or recalled)	EFT's completed (EFT's authorized minus the EFT's not completed)
	(I)	(II)	(I)-(II)=(III)
March 2007	\$5,855	\$1,210	\$4,645
April 2007	\$4,965	\$250	\$4,715
May 2007	\$4,950	\$430	\$4,520
June 2007	\$4,840	\$425	\$4,415
July 2007	\$4,810	\$485	\$4,325
August 2007	\$4,700	\$580	\$4,120
September 2007	\$4,625	\$520	\$4,105
October 2007	\$4,485	\$535	\$3,950
November 2007	\$4,420	\$515	\$3,905
December 2007	\$4,420	\$505	\$3,915
January 2008	\$4,245	\$530	\$3,715
February 2008	\$4,150	\$360	\$3,790
Total	\$56,465	\$6,345	\$50,120

This information was obtained from the documents seized from the WTM TD Bank Account #4336-0928569 pursuant to Production Order #500-26-048605-087. (79.5)
It is interesting to observe that in spite of the listing in April 8th, 2006, and the various Search Warrants executed at the WTM office and residences linked to WTM members, there were still pre-authorized payments credited to the WTM TD Bank Account #4336-0928569 in 2007 and 2008.

10.2.3.3 The WTM reports to the LTTE via K. MANIVANNAN of the International Secretariat

275. I have reviewed a duo tang binder, exhibit 2006-12, item 01, 27/28, containing documents relating to fund transfers made by activists of the WTM to the LTTE via K. MANIVANNAN of the International Secretariat Tamil Eelam. The binder contained monthly reports prepared by the leader of the WTM or his delegate. As stated in the LTTE Operations Manual, the LTTE requires that they send monthly reports to the International Secretariat. The following describes some of those reports which mentioned fundraising activities:

- > Located on pages 36 and 37 is a typed document with the caption "Report for the month of November 2004". The author of the report is identified as KARUNANANTHASWAMY, Responsible person, Quebec Branch, dated December 17th, 2004. This report is addressed to the person responsible. In the last two paragraphs of this report, the WTM leader advised his superior that the

activists of his branch have been occupied with the Heroes Day events and were unable to spend their time for fundraising. KARUNANANTHASWAMY explained that their branch was unable to contribute to the international finance administrator for that month. Further that Mr. MURALI, the person responsible for finance for the Quebec branch, would forward a report in that regard; **This information was obtained from a document seized on April 12th, 2006, from the WTM office located at 4162 Van Horne Avenue, Montreal. (37.16)** *I believe that Mr. Murali is THURAIRATNAM. In 2004, the leader of the WTM was KARUNANANTHASWAMY.*

➤ Located on page 31 is a letter prepared by CHANDRASEGARAM of the WTM and dated July 22nd, 2005. The document is addressed to the International Secretariat, Tamil Eelam and the caption is INFORMATION. In his letter CHANDRASEGARAM advised of three Canadian Tamils who were visiting Tamil Eelam (LTTE controlled area in northern and eastern Sri Lanka). He enumerated the annual monthly donations received from each of them. He advised that all of them were contributing \$30 monthly; **This information was obtained from a document seized on April 12th, 2006, from the WTM office located at 4162 Van Horne Avenue, Montreal. (37.17)** *I believe in this report that CHANDRASEGARAM is advising his LTTE associates in Sri Lanka that those three persons were supporting their cause financially and need not to be collected from. The monthly contribution is a reference to the Pre-Authorized Payment Plan used to collect fund by the WTM in support of the LTTE.*

➤ Located on page 30 is a letter prepared by CHANDRASEGARAM of the WTM Quebec Branch and dated August 1st, 2005. The document is addressed to the International Secretariat, Tamil Eelam, and the caption is INFORMATION. In this report to the LTTE International Secretariat, CHANDRASEGARAM advised of 6 Canadian Tamils who were presently visiting or planning to visit Tamil Eelam. He enumerated the donations received from each of them. He reported that the first one is a long time contributor. This was in answer to a request for details from the International Secretariat regarding this individual. He reported that three of them just started to give monthly contributions with a promise to continue to support the cause. The fifth person is described as a regular contributor; however they took the opportunity to increase his monthly contribution by \$10. This last visitor is reported as a monthly contributor of \$50. CHANDRASEGARAM asked the LTTE to have this person instructed to pay his monthly contribution through a standing order; *I believe that this is a request made by CHANDRASEGARAM to have this person approached by the LTTE to have him sign a Pre-Authorized Payment Plan form for his contribution.*

The letter also indicates that a seventh individual, "presently in Canada, is willing to meet, with regards to his arrival in motherland and to work in the area controlled by us." And finally in regards to an eighth individual, CHANDRASEGARAM indicates that his house "belongs to the area controlled by us"; **This information was obtained from a document seized on April 12th, 2006, from the WTM office located at 4162 Van Horne Avenue, Montreal. (37.18)**

It is my belief that the mention of an area controlled by us means the area controlled by the LTTE, therefore, CHANDRASEGARAM, by using the pronoun us, is indicating an association between himself, the WTM and the LTTE.

- ✓ Located on page 25 is a letter prepared by CHANDRASEGARAM of the WTM Quebec Branch and dated September 6th, 2005. The document is addressed to the International Secretariat, Tamil Eelam, and the caption is INFORMATION. In this letter, CHANDRASEGARAM advised of 3 Canadian Tamils who were visiting Tamil Eelam. He enumerated the annual monthly donations received from each of them. He advised that two of them were already contributing \$30 monthly and that the third person had agreed to start making a monthly contribution of \$50. **This information was obtained from a document seized on April 12th, 2006, from the WTM office located at 4162 Van Horne Avenue, Montreal. (37.19)** *I believe that in this letter, CHANDRASEGARAM is advising his LTTE associates in Sri Lanka that those three individuals were supporting their cause financially and need not to be collected from. The monthly contribution is a reference to the Pre-Authorized Payment Plan used to collect fund by the WTM in support of the LTTE.*

I believe that the above reports from the WTM sent to the LTTE give a good inside view of the fundraising methods used by the WTM and the extent of the control the LTTE has over its foreign branches. Some of the persons mentioned in those reports were not regular contributors to the LTTE, but approached the WTM to make payment agreement with the organization prior to travelling to Sri Lanka. This is necessary for Canadian Tamils wishing to visit certain regions of Sri Lanka controlled by the Tamil Tigers. It also demonstrates how the WTM and the LTTE are using the same fundraising documents such as the Pre-Authorized Payment Plan form and that fundraising efforts are coordinated in both countries. It also demonstrates that some of the pre-authorized payments going into the bank account of the WTM were actually initiated by LTTE members in Sri Lanka.

10.2.4 Interviews with witnesses of pre-authorized payment scheme

276. *As a result of the seizure of the completed Pre-Authorized Payment Plan forms seized from the CBSA, investigators of Montreal INSET identified some of the victims. Further to their identification, the investigators selected five of them to conduct interviews. The following paragraphs set out the interviews conducted by the investigators of Montreal INSET.*
277. *I am also mindful to the fact that our investigation has revealed that the World Tamil Movement and the LTTE have been demonstrated to utilize pressure tactics to elicit funds and donations as well as to participate in veiled threats. Given earlier grounds, it is my belief that should members of the World Tamil Movement discover the contents of the vetted information in the paragraphs below, they would re-visit those witnesses to discourage their participation in future cooperation with the police. These witnesses have cooperated with the police at certain risk to themselves in an effort to provide accounts of the pre-authorized debit scheme. The contents of the vetted information in this Affidavit, if circulated in the public domain would likely discourage further cooperation from members of the Tamil community. Therefore some parts of their statements have*

been vetted in order to avoid any identification.

10.2.4.1 Witness "A"

278. On [REDACTED], 2006, [REDACTED] and [REDACTED] met [REDACTED] and obtained [REDACTED] statement concerning [REDACTED] trip to Sri Lanka in 200[REDACTED]. The following is a summary of the statement.

Note: Throughout the interview, [REDACTED] refers to the LTTE as "Tigers". [REDACTED] also refers to the WTM personnel in Canada as "Tigers". According to [REDACTED] they are one of the same.

In Sri Lanka

- [REDACTED] traveled with [REDACTED] to Sri Lanka [REDACTED];
- This leisure trip was planned to go and visit the family in Tamil Eelam region of Jaffna;
- [REDACTED] had heard from other Tamil people that [REDACTED] would be collected for cash money at Tamil checkpoints in Jaffna;
- [REDACTED] converted some traveller's cheque in cash money while in Colombo, Sri Lanka;
- Prior to entering Tamil territory near Jaffna, [REDACTED] went through a Sri Lankan military checkpoint, described as a routine custom check;
- Approximately, one kilometre further, [REDACTED] had to stop at the LTTE's checkpoint;
- Uniformed personnel identified to the LTTE and carrying weapons work at the checkpoint;
- [REDACTED] entered inside the checkpoint where a computer was used to control data on the travellers, similar to a regular custom's checkpoint;
- [REDACTED] produced [REDACTED] Canadian passport. Data written in the passport (name, etc.) was checked by LTTE personnel in the computer;
- Even though it was the first time that this Tamil person who lives in a foreign country passed through the LTTE check point, the LTTE knew a lot of information about this person; name, address, family members, relatives in Sri Lanka, financial contributions to the LTTE in their own country, etc. [REDACTED] described it by [REDACTED];
- [REDACTED] had not been contributors to the LTTE in Canada. [REDACTED] was asked to make a financial contribution equivalent to [REDACTED]. After explaining that [REDACTED] financial situation did not allow [REDACTED] to contribute such a large amount, [REDACTED] contributed the [REDACTED];
- [REDACTED] was explained that a P.I.N. (Personal Identification Number) was assigned to all LTTE contributors. [REDACTED] was never told the numbers of [REDACTED] P.I.N;
- The LTTE issued [REDACTED] a "passbook". It is similar to a passport but it is used solely for travelling within the LTTE territory in Sri Lanka. These "passbooks" are then kept by the LTTE once a traveller leaves the LTTE territory;
- The LTTE also collects an entry tax of approximately \$40 Canadian at that check point;

- ▼ The LTTE also collects taxes on goods being brought into LTTE territory. The amount of taxes differs depending on the nature of the goods;
- ▼ [redacted] not being a financial contributor to the LTTE was produced a blank Pre-Authorized Payment Plan - Form of Authorization by the LTTE personnel, at which time [redacted] was asked to engage in monthly donations to the LTTE;
- ▼ [redacted] was asked to engage for monthly contributions to the LTTE. Some fields (name, address, etc.) on the form were filled up in handwriting by a male LTTE personnel. [redacted] agreed to contribute [redacted] per month. [redacted] signed the form;
- ▼ [redacted] never received a copy of the agreement;

- ▼ [redacted] departed Sri Lanka on [redacted], and returned to [redacted];
- ▼ [redacted] was visited [redacted] a month at [redacted] residence by a Tiger known only to [redacted] as [redacted] delivered a Tamil newspaper approximately every 2 weeks. [redacted] paid \$40 for a year's subscription to that newspaper;
- ▼ [redacted] also asked for a financial contribution to the Tigers. On [redacted]

- ▼ [redacted]
- ▼ [redacted]
- ▼ Once a year [redacted] purchased the LTTE calendar for the sum of \$10 Canadian;

- ▼ [redacted]
- ▼ In [redacted] 2006, [redacted] received [redacted] telephone calls demanding that [redacted] contributes financially to a major fundraising effort;
- ▼ [redacted] men came to [redacted] residence to meet [redacted]. They were asking for the sum of [redacted];
- ▼ They were showing a book approximately 3/4 inches in thickness that contained complete pages of names of contributors, date and amount given. They were showing these names as examples of contributors in order to convince [redacted] to also give money;
- ▼ [redacted] the amount of [redacted] contribution to [redacted] Canadian.

- ▼ [redacted]
- ▼ [redacted] understanding of the reason for that major fundraising effort is linked to war;
- ▼ [redacted]

279. Witness "A" recognized the Pre-Authorized Payment Plan form that [REDACTED] had signed in Sri Lanka and confirmed to [REDACTED] that it was [REDACTED] signature on the form.

This information on Witness "A" was obtained from [REDACTED] report dated [REDACTED], 2006. (88.1)

10.2.4.2 Witness "B"

280. On [REDACTED], 2006, [REDACTED] and [REDACTED] met with [REDACTED] concerning [REDACTED] trip to Sri Lanka in 200[REDACTED]. The following is a summary in point form of [REDACTED] trip to Sri Lanka:

In Sri Lanka

- [REDACTED] arrived in Colombo, Sri Lanka in [REDACTED] and stayed [REDACTED] days [REDACTED]. The purpose of [REDACTED] trip was to visit [REDACTED] travelled by shuttle bus to Jaffna;
- [REDACTED] encountered a first check point controlled by the Sri Lankan army. [REDACTED] luggage were searched. [REDACTED] was identified with [REDACTED] passport and was asked the usual questions, such as final destination and reason for the visit;
- The second check point was under LTTE's jurisdiction, near the city of Varumya. All passengers had to exit the bus and luggage were fully searched;
- [REDACTED] escorted to a building near the check point and directed to [REDACTED];
- [REDACTED] noticed that all personnel worn the LTTE green uniform and were armed. The fact that [REDACTED] at a LTTE check point was confirmed by the bus driver and the passengers;
- The LTTE member who interviewed [REDACTED] inquired if in Canada, [REDACTED] was or not contributing financially to the official LTTE representatives. After some verifications, he insisted that [REDACTED] had no personal identification number PIN and would have to contribute. Furthermore, he had no data about [REDACTED] family, which indicated that [REDACTED] not supporting the cause;
- A tax of 1000 rupees (approximately \$12 Canadian) was requested before entering the LTTE zone. A Pre-Authorized Payment Plan form was presented to [REDACTED] and it was suggested that a monthly payment of \$[REDACTED] be given to the LTTE in Canada;
- If [REDACTED] refused this proposal, [REDACTED] would not be allowed to travel to Jaffna;
- [REDACTED] signed the Pre-Authorized Payment Plan form, but received no copies. [REDACTED] and bank account number. Since the LTTE representative was in possession of [REDACTED] Canadian passport [REDACTED] wrote [REDACTED] the remaining information;
- [REDACTED] received a LTTE document allowing [REDACTED] to freely travel in LTTE controlled area for a period of [REDACTED] months. This paper would be the equivalent of a visa;
- At the end of the interview, [REDACTED] was told that somebody would eventually visit [REDACTED] in Canada, in order to proceed with the pre-authorized payments;
- [REDACTED], on [REDACTED] way out of the LTTE controlled

zone, [REDACTED] had to return the LTTE papers (visas). [REDACTED] photo was then taken;

- [REDACTED] months later, 2 males of Tamil origin attended [REDACTED] residence and inquired about [REDACTED]. They identified themselves as [REDACTED] and said that they were from the [REDACTED] WTM;
- [REDACTED] had seen these persons in the past, at local community events;
- [REDACTED] had a leading role in the conversations. He wanted to speak [REDACTED], since [REDACTED] had signed the Pre-Authorized Payment Plan form.
- [REDACTED] showed the Pre-Authorized Payment Plan form to [REDACTED] and said that [REDACTED] had to pay;
- [REDACTED] and had made a promise to contribute, [REDACTED] signed a form authorizing the WTM to withdraw \$[REDACTED] monthly from [REDACTED] bank account;
- [REDACTED] advised that the money will be used for the orphans in Sri Lanka;
- [REDACTED] never received a copy of this agreement;
- [REDACTED] was advised by [REDACTED] that the form would be brought directly to [REDACTED] bank;
- Since [REDACTED] 200[REDACTED], pre-authorized payments of \$[REDACTED] were withdrawn from [REDACTED] bank account.

I believe that [REDACTED] is in fact [REDACTED].

281. Witness "B" recognized the Pre-Authorized Payment Plan form that [REDACTED] had signed in Sri Lanka and confirmed to [REDACTED] that it was [REDACTED] signature on the form. **This information on Witness "B" was obtained from [REDACTED] report dated [REDACTED], 2006. (88.2)**

10.2.4.3 Witness "C"

282. On [REDACTED] 200[REDACTED], [REDACTED] and [REDACTED] met with [REDACTED] concerning [REDACTED] trip to Sri Lanka in 200[REDACTED]. Here is a summary in point form of [REDACTED] trip to Sri Lanka as [REDACTED] travelled [REDACTED]:
- [REDACTED] arrived in Colombo, Sri Lanka on [REDACTED], and travelled [REDACTED] to Jaffna;
 - The first check point was controlled by the Sri Lankan army. Luggage were searched and basic passport verifications were conducted as well as general questions regarding the reason of travel;
 - The second check point was well identified by the LTTE with the tiger sign and the rifles. There were soldiers armed with AK47;
 - [REDACTED] was escorted to a small room in a building near the check point. [REDACTED] was asked to produce [REDACTED] Canadian passport and pay a tax of 1000 rupees (approximately \$12 Canadian);
 - Computer verifications were conducted and 10 minutes later, the LTTE representative provided the traveller with a document (visa type) allowing [REDACTED] to

- access the controlled area;
- General questions were covered, such as the intended time being spent in Jaffna and the number of years residing in Canada;
- On [REDACTED] 200[REDACTED] returned to Colombo [REDACTED];
- On [REDACTED] way out, at the LTTE check point, [REDACTED] had to return the papers, (visas) which had allowed [REDACTED] to travel freely within the controlled area;
- According to [REDACTED], several Tamils in the [REDACTED] area have been intimidated by the LTTE, and in order to live peacefully, have to participate in pre-authorized payments;
- The [REDACTED] WTM representatives are presently conducting a major money collection within the community and are requesting amounts ranging from \$2,500. to \$10,000;
- Every two weeks a Tamil newspaper entitled "World Tamil" is delivered to [REDACTED] residence;
- Three photo line-ups were presented to [REDACTED]. Every photo line-up had 10 pictures and one of them contained a subject of Project CRIBLE;
- The individuals to be identified are: KARUNANANTHASWAMY, CHANDRASEGARAM and THURAIRATNAM;
- [REDACTED];

Photos presented by [REDACTED] to [REDACTED]

- The photos containing the subject KARUNANANTHASWAMY were produced and the individual at photo #6, KARUNANANTHASWAMY, was recognized. [REDACTED];
- The photos containing the subject CHANDRASEGARAM were produced and the individual at photo #4 was recognized as being [REDACTED]. He has seen him at the Val-Morin religious festival in 2005. He represents the Tigers in Canada and presently works in Toronto;
- The individuals represented at photos #6 and #7 were seen by [REDACTED] in the past in the Montreal region but [REDACTED] does not know their names;
- No one from the set of photos containing the subject THURAIRATNAM was recognized;

Photos presented to [REDACTED] by [REDACTED]

- The photos containing the subject CHANDRASEGARAM were produced and the individual at photo #6, CHANDRASEGARAM, was recognized. [REDACTED]. He sold articles such as compact disks, books and other goods. He also collected money (from a jar) to help people in Sri Lanka. [REDACTED] believed that his name is CHAMDRABALAM and he works at the Decarie cinema;
I believe that the witness identified CHANDRASEGARAM when [REDACTED] says CHANDRABALAM.
- The photos containing the subject KARUNANANTHASWAMY were produced

and the individual at photo #6, KARUNANANTHASWAMY, was recognized.

- No one from the set of photos containing the subject THURAIRATNAM was recognized.

283. Witness "C" recognized the Pre-Authorized Payment Plan form that [REDACTED] had signed in Sri Lanka and confirmed to [REDACTED] that it was [REDACTED] signature on the form. This information on Witness "C" was obtained from [REDACTED] report dated [REDACTED], 2006. (88.2)

10.2.4.4 Witness "D"

284. [REDACTED], 200[REDACTED], [REDACTED] and [REDACTED] met with [REDACTED] concerning [REDACTED] trips to Sri Lanka in 200[REDACTED] and 200[REDACTED]. The following is a summary in point form of this interview:

Trip of [REDACTED]

- In [REDACTED] 200[REDACTED], [REDACTED] travelled [REDACTED] to Sri Lanka for a period of [REDACTED];
- [REDACTED] travel itinerary was as follow: [REDACTED] Colombo (Sri Lanka);
- [REDACTED] stayed at [REDACTED] place [REDACTED] and the next day travelled by bus north of [REDACTED];
- The first check point encountered was under Sri Lankan army control. They asked general questions about [REDACTED] final destination, verified [REDACTED] passports and searched [REDACTED] luggage;
- About 200 to 300 meters away was the LTTE check point;

LTTE check point

- [REDACTED] escorted to a building and into a small room where [REDACTED] asked if [REDACTED] would contribute. [REDACTED] told again that [REDACTED] had to help them;
- Even though at the time there was no pressure to sign any type of documents, [REDACTED] had to give 1000 rupees for tax purposes (approximately \$12 Canadian);
- [REDACTED] issued with a pass (type passport) which allowed [REDACTED] to travel within LTTE territory;
- [REDACTED] does not remember if the personnel at the LTTE check point was or not wearing uniform;
- When [REDACTED] came back to Canada, [REDACTED] had to return [REDACTED] pass at the LTTE check point;
- No one from the LTTE ever visited or called [REDACTED] for money collection purposes;

Trip of 200[REDACTED]

- [REDACTED] travelled to Sri Lanka from [REDACTED], to [REDACTED];
- [REDACTED] itinerary was as follows: [REDACTED] Colombo (Sri Lanka);
- [REDACTED] returned to [REDACTED] country to visit [REDACTED] family but mainly to take [REDACTED] to [REDACTED];
- The first check point under the Sri Lankan army's jurisdiction was passed without problems;
- At the second LTTE check point, [REDACTED] told to report to the city of Killinochchi;
- At that check point, also under LTTE control, there were no signs of weapons and the uniformed personnel looked like Canadian custom officers;
- [REDACTED] taken to a building and asked to sign a document (which [REDACTED] did) where [REDACTED] promised to contribute for \$[REDACTED] a month. It was subsequently required from [REDACTED] to pay a tax of 1000 rupees. The LTTE representative advised that someone would call [REDACTED] in Canada;
- [REDACTED] then issued with a pass (type booklet) which would be stamped every time [REDACTED] would go in and out of the controlled zone;
- When [REDACTED] returned to Canada, at the LTTE check point, no one asked to give [REDACTED] pass back. [REDACTED] did not keep it;
- [REDACTED] months after [REDACTED] return to [REDACTED] received a telephone call. The male caller who spoke Tamil, asked for [REDACTED] believed it was someone from "Tamil World". He did not mention the purpose of his call. He never called back since;

[REDACTED]

- [REDACTED] individuals of Tamil origin attended [REDACTED] apartment and asked for a \$2,500 contribution. [REDACTED] did not remember their names; however they specified that this money was not for the war in Sri Lanka but for the Tamil bank and the final achievement of a free country. [REDACTED] promised to pay [REDACTED] back with [REDACTED] interest by 2008;
- [REDACTED] signed a contract in which [REDACTED] promised to pay the proposed amount by the end of [REDACTED], but was never issued with a copy of the document;
- [REDACTED] will have to make a personal loan as they request cash payment;
- These [REDACTED] individuals mentioned that by way of war or by way of negotiation, Sri Lanka will become a free country by [REDACTED];
- If the payment was made, an access card was issued, allowing free travel into Sri Lanka's LTTE controlled territory;
- Finally, if people didn't pay, they will be on their own when they travel to their country.

285. Witness "D" recognized the Pre-Authorized Payment Plan form that [REDACTED] had signed in Sri Lanka and confirmed to [REDACTED] that it was [REDACTED] signature on the form. **This information on Witness "D" was obtained from [REDACTED] report dated [REDACTED], 200[REDACTED]. (88.3)**

10.2.4.5 Witness "E"

286. On [REDACTED], 200[REDACTED], [REDACTED] and [REDACTED] met with [REDACTED] concerning [REDACTED] trip to Sri Lanka in 200[REDACTED]. The following is a summary of the statement:

In Sri Lanka

- > [REDACTED] travelled to Sri Lanka [REDACTED] departed from [REDACTED] in [REDACTED] 200[REDACTED] and flew to Colombo, Sri Lanka. [REDACTED] visited for [REDACTED] with [REDACTED] in Colombo. [REDACTED] then travelled [REDACTED] going north to Jaffna to visit with the rest of the family. The purpose of [REDACTED] trip to Sri Lanka was [REDACTED]. The vehicle [REDACTED] travelling in was driven [REDACTED];
 - > [REDACTED] came up to a first checkpoint being held by the Sri Lanka army north of the town of [REDACTED] was able to point out the approximate location on a small photocopy of the map of Sri Lanka supplied to him by [REDACTED]. [REDACTED] checked and [REDACTED] asked questions about [REDACTED] destination. [REDACTED] permitted to pass without any problems;
 - > [REDACTED] proceeded north and came up to a second checkpoint. [REDACTED] advised that this checkpoint was LTTE. That [REDACTED] should answer all questions and co-operate to avoid problems;
 - > [REDACTED] told to get out of the vehicle;
 - > [REDACTED] luggage [REDACTED] searched;
 - > [REDACTED] passport and identification were checked;
 - > [REDACTED] escorted to a building where [REDACTED] questioned;
 - > [REDACTED] asked to sign a Pre-Authorized Payment Plan form [REDACTED];
 - > The PIN number system was not yet in place in Canada;
 - > [REDACTED] signed the form as [REDACTED] felt [REDACTED] had no choice. [REDACTED] stated that there was no freedom of speech in the Tigers controlled zone. Everybody must obey so [REDACTED] signed the form;
 - > LTTE members told [REDACTED] it was for the rehabilitation of the amputees;
 - > LTTE gave [REDACTED] a PASS to travel in LTTE controlled zone;
 - > [REDACTED] stayed for [REDACTED] in the Jaffna area visiting with family. On [REDACTED] way back [REDACTED] stopped at the LTTE checkpoint and returned the pass before leaving;
- [REDACTED]
- > After [REDACTED] return to [REDACTED] received the visit of [REDACTED] Tamil men around [REDACTED] 200[REDACTED]. At the time, [REDACTED] and [REDACTED] family were living in an apartment on [REDACTED]. The [REDACTED] individuals did not identify themselves but [REDACTED] believe they were from the Tamil Movement in [REDACTED]. They showed [REDACTED] the Pre-Authorized Payment Plan - Form of Authorization that [REDACTED] had signed at the LTTE checkpoint in Sri Lanka. The unidentified individuals advised [REDACTED] that [REDACTED] had to pay because [REDACTED] already had signed the form. [REDACTED] felt obliged to accept to make the monthly payment;
 - > They asked [REDACTED] for a VOID cheque and that they would take care of the arrangements with [REDACTED] bank for the \$ [REDACTED] monthly payment from [REDACTED] account;
 - > [REDACTED] supplied [REDACTED] with a photocopy of [REDACTED] latest bank statement for [REDACTED] account number [REDACTED]. The statement period is from [REDACTED]. An entry for a transaction dated [REDACTED], indicated a \$ [REDACTED] debit from [REDACTED].

the account with the description; [REDACTED]

This information on Witness "E" was obtained from [REDACTED] report dated [REDACTED], 2006. (88.4)

287. Witness "E" recognized the Pre-Authorized Payment Plan form that [REDACTED] had signed in Sri Lanka and confirmed to [REDACTED] that it was [REDACTED] signature on the form.
This information on Witness "E" was obtained from [REDACTED] report written on [REDACTED], 2006. (88.4)
288. All the Pre-Authorized Payment Plan forms signed by Witnesses "A" to "E" were brought back to Canada by CHANDRASEGARAM on September 11th, 2004, for future collection. As previously mentioned, these copies were obtained from a seizure executed by members of Montreal INSET and seized on November 15th, 2004.
This information was obtained from Cpl. BOUDREAU's investigative report, dated November 23rd, 2004. (76.1)

10.2.5 Fundraising Method 2 - Revenues through activists of the WTM

289. In sub-section 2-1 of the LTTE Operations Manual, the foreign activists are instructed to:

"Make all necessary steps to receive monthly financial donations from each one of the Tamils of those who are living in every country. These donations may be received through banks or in person."

This information was obtained from sub-section 2-1 of the LTTE Operations Manual. (32)

The collection received through the banks refers to the Pre-Authorized Payment Plan system which is described in previous paragraphs. The collection of donations by activists done in person is a reference to door to door visits by activists of Tamil residents and merchants in their respective fundraising area. These two methods complement each other and ensures that every Tamil person, family or business make monthly financial contributions to the WTM.

290. The revenues obtained from the collection done by the activists in person were recorded by the WTM in the monthly financial statement prepared by the person responsible for finance, THURAIRATNAM. This type of monthly reporting format to the LTTE appears to have started in May 2004. The WTM recorded the funds collected by its members as revenues through activists. The total monthly amount reported includes collection from Tamil residents and from Tamil merchants. This type of fundraising is complimentary to the Pre-Authorized Payment Plan system. An example of this can be found with exhibit 2006-12, item 1, 3/28. As for every monthly financial statement, line three of the statement indicates Revenues through activists. In this example, the revenue shown is \$4,335. Pages seven to eighteen of this binder represent WTM income vouchers for the various amounts collected by the activists. Each voucher gives: the name of the WTM activist who collected the money; the reason (which in many cases states contributions and in some cases the collection area); the amount; the date; a receipt number if money was a donation. All vouchers are signed by THURAIRATNAM.

This information was obtained from my review of exhibit 2006-12, item 01, 3/28 (100.1); and from Cpl. BOUDREAU's investigative report dated May 30th, 2006. (100.2)

291. In a forensic accounting report dated January 31st, 2008, a review was done for the revenues through activists as reported in the WTM monthly financial statements between May 2004 and January 2006 with the following results:

➤ 2004 (May to December)	\$23,830
➤ 2005	\$32,370
➤ 2006 (January)	\$2,461
➤ Total	\$58,661

This information was obtained from Section 5 of the report prepared by Ms. GOURDEAU, dated January 31st, 2008. (83)

10.2.6 Fundraising method 3- Tamil Eelam Economic Development Organization

292. Internet queries conducted in 2006 by INSET revealed that the Tamil Eelam Economic development Organization ("TEEDOR") had its own website under the domain address of www.teedor.org. A direct link to this website could also found on the website of the WTM, www.worldtamilmovement.com, along with other sub-organizations of the WTM. On its website, the TEEDOR had an advertisement for the Tamileelam Bank, which is the official LTTE bank in Sri Lanka.

This information was obtained from an Internet search done by Ms. BERNARD on October 31st, 2006 (81.5); and from her investigation report dated November 7th, 2006. (81.4)

Attempts made as late as March 30th, 2009, indicated that these two websites are no longer available.

293. The Tamileelam Bank was founded in Jaffna in 1994 by the Tamil Tigers but after the Sri Lankan army retook the peninsula at the northern tip of the island in 1995, the bank moved to Kilinochchi. The Tamileelam Bank has six branch offices and employs about 100 people. The Kilinochchi branch clears about 500 to 1000 cheques per day, offers no credit cards, and has no information technology and records transactions in paper ledgers. Many customers are farmers or work in one of the many LTTE companies. The bank does not release data on its total assets, profitability or ownership, but its rates are no secret. Depositors get 7.5% on 3 month saving accounts, going up to 10.5% for 24 month deposits, rates that are in line with most Sri Lankan banks. According to an article on the website www.forbes.com titled "Tamileelam Bank symbol of Sri Lankan rebel autonomy", the bank is not directly owned by the LTTE, however the LTTE controls it.

This information was obtained from an article found by Ms. BERNARD on October 31st, 2006, on the website www.forbes.com (14.2); and from an article on www.tamilcanadian.com, dated September 21st, 2005. (12.5)

294. During the search of the WTM office on April 12th, 2006, a total of 14 loan contracts from TEEDOR were located. Those TEEDOR fundraising forms were located amongst the WTM monthly financial statements and other documents relating to funds transfers. An

additional TEEDOR loan contract was located during the search at 7720 Pie-IX Boulevard, unit 1, Montreal, on April 13th, 2006. These loan contract forms stated that the money loaned to TEEDOR would be used for the improvement of the medical facilities in their motherland ("Tamil Eelam"). To be reimbursed, the lender needed to give one month notice. Further, the reimbursement could be done by instalments or in a single payment.

This information was obtained from Mr. RONDEAU's investigation report, dated October 16th, 2007. (81.2)

295. The TEEDOR loan contract forms were located in the WTM office. All these loan contract forms had handwritten notes on them indicating that they were repaid. The funds collected using the TEEDOR loan contracts were received by members of the WTM. The dates on those fundraising contracts are 2001, 2003 and 2004. **This information was obtained from Cpl. BOUDREAU's investigation report, September 19th, 2006. (81.1)**

296. I have reviewed the forensic accounting report prepared by Ms. GOURDEAU on January 31st, 2008, concerning the Tamil Eelam Economic Development Plan loan contracts seized from the WTM. A total of 15 Tamil Eelam Economic Development Plan contracts were reviewed and found to represent \$67,000 in loans granted to the WTM in 2001, 2003 and 2004. Two loan contracts representing a total amount of \$6,000 were not dated and no loan contract was found for the years 2002, 2005 and 2006. **This information was obtained from subsection 6.4 and Appendix 6 of the accounting report of Ms. GOURDEAU dated January 31st, 2008. (83)**

297. On April 12th, 2006, investigators executed a Search Warrant at 4162 Van Horne Avenue, Montreal. Among the items seized, there was:

➤ A WTM financial report for September 2004 was found. On page 23 of this report, there is a WTM expense voucher dated September 21st, 2004, for \$17,000. The name on the voucher is GOBU. The reason stated is International Secretariat. The voucher states that the amount was provided by three WTM activists:

- \$7,000 from Mani, who I believe is Manivannan KARUNANANTHASWAMY;
- **\$5,000 from S. BALAN who I believe is CHANDRASEGARAM;**
- \$5,000 from Ganesh who I believe is Ganeswaran Sockanathan.

I believe GOBU to be Nanthagobal THAVALCHELVAM, a WTM member who lived in Ottawa before being deported by Canada Immigration on December 6th, 2004. THAVALCHELVAM has worked for the WTM in Montreal. (98)

A handwritten note on the document indicates "sent by Royal Bank to WTM Toronto, account 06222 1276294."

In the remarks portion of the voucher, the funds provided were noted as follows:

- | | |
|---|----------------|
| • Paid by Mani for Indran's funeral expenses | \$7,000 |
| • Ganesh (M6) | \$5,000 |
| • <u>S. BALAN (elder brother) [Sivananthan Master (teacher)]</u> | \$5,000 |

This information was obtained from my review of a WTM financial report for

September 2004, exhibit 2006-12, item 01, Sector 8, 2nd floor, 6/28. (84.3)

Although the third amount seems to have been provided by S. BALAN, I believe that the notation on the expense account indicates that the funds were provided by Sivananthan Master (teacher), as I will explain in the following paragraphs.

- ✓ A \$5,000 TEEDOR loan, contract #0320, dated September 22nd, 2004. The contract indicates the money came from **Sivananthan MUTHUKUMARU**. The contract indicates that the money was received by T. MURALI (Muralee Karan THURAIRATNAM). The contract also states that, on March 7th, 2005, MUTHUKUMARU "received the amount paid as loan"; **This information comes from exhibit 2006-12, item 01, Sector 8, 2nd floor, 25/28 (85.3)**
- ✓ A T.D. Canada Trust cheque, number 1138, dated March 5th, 2005; paid to **S. MUTHUKUMARU**; Cheque header indicates: World Tamil Movement, 4160 Van Horne Avenue., Montreal, PQ, H3S1S1; The reference indicates **Sivananthan Master**. The account associated with the cheque is 0928569; **This information comes from exhibit 2006-12, item 08, 1 of 1. (91.12)**
Therefore, I believe that Sivanathan Master, or Sivanantham Master, is Sivananthan MUTHUKUMARU.
- ✓ A T.D. Canada Trust statement for account #0928569, for the period of February 28th, 2005, to March 18th, 2005. The 10th line indicates a cheque/debit entry dated March 09 for cheque #1138 in the amount of \$5,000; **This information comes from exhibit 2006-12, item 08, 1 of 1. (91.2)**
- ✓ A financial sheet listing nine cheques issued in March. The fifth entry indicates: Sivanantham master Loan paid, Che No:1138 = 5000. **This information comes from exhibit 2006-12, item 01, Sector 8, 2nd floor, 21/28. (135.2)**
I believe that the sequence of events shown above indicates that individuals fronted money to WTM leaders by way of a TEEDOR loan. WTM leaders themselves indicate on a financial voucher that the money received is destined for the International Secretariat, which is directly under the control of the LTTE (as shown previously in sub-section 6.10).

10.2.7 Fundraising Method 4 - The WTM distributes newspapers for the benefit of the LTTE

- 298. On February 3rd, 2004, at 4:35pm, KARUNANANTHASWAMY arrived at 4160 Van Horne Avenue, Montreal, in a green Acura Integra licence 835LLK, registered to him, and left in the same vehicle at 5:17pm. At 5:25pm, he left what appears to be a newspaper at 3355 Barclay Avenue, Montreal. At 5:30pm, he delivered a newspaper to an individual who was working at a business named "Textiles Kanés". **This information was obtained from the surveillance report prepared by Cst. RIOUX on February 4th, 2004. (130.1)**
- 299. On March 1st, 2004, at 12:11pm, KARUNANANTHASWAMY delivered newspapers to a store called "Marché AMR" located at 1150 Decarie Street, Montreal.

This information was obtained from the surveillance report prepared by Cst. MANCINI, on March 2nd, 2004. (130.2)

300. On April 15th, 2004, at 7:35pm, KARUNANANTHASWAMY left the office of the WTM in a Plymouth Voyager licensed 787KAX, registered to him. He stopped to take an unidentified male and at 7:54pm, arrived at a residence located at 8793 St-Hubert Street, Montreal. He backed his van near a Ford Econoline bearing Ontario licence plate number BL2282. The unidentified male took newspapers that were in the back of the Ford Econoline and transferred them into the Plymouth Voyager. From then on, KARUNANANTHASWAMY drove the Plymouth Voyager while the unidentified male delivered the newspapers to different businesses, in the Montreal area.
This information was obtained from a report made by Constable Yves PIETTE, a member of the Montreal Special "O" Section, dated April 15th, 2004. (130.3)
301. During the search of the WTM office located at 4160 and 4162 Van Horne Avenue, Montreal, on April 12th, 2006, 669 subscription forms for the WTM newspaper ULAHATHAMILAR (World Tamils) were located. These forms have the heading of the WTM and contain the names and addresses of the Montreal Tamil residents who were sold a newspaper subscription by the WTM activists. The price for a subscription to the WTM newspaper is \$40 for a year and \$75 for two years when the newspaper is delivered at the door by the WTM volunteers. Most of the subscriptions appear to be for one year. Under the heading, the following text is written:
- "The international Tamil's newspaper, the World Tamils, for the past fifteen years, have been internationally encouraging among the Tamils, in order to build up the liberation and the inner feelings of self emotions, is proud to join you as its subscriber."
- This information was obtained from my review and the translation of Exhibit 2006-12, item 48, 2nd floor, 8/10, page 25. (92.1)**
302. The subscriptions located in the WTM office in April 2006 were dated from 2002 to 2005 and represented an income of \$25,975. The revenues from the newspapers were broken down by year as follows:

Year of subscription	Revenues obtained by newspapers
2002	\$200
2003	\$11,450
2004	\$480
2005	\$10,890
No date/illegible	\$2,955
Total	\$25,975

This information was obtained from paragraph 6.2.1 of Ms. GOURDEAU's report dated January 31st, 2008. (83)

Considering the important variations from one year to the other, it is believed that not all the forms were located and seized by the police in the WTM office on April 12th, 2006.

303. On September 3rd, 2008, INSET executed a Special Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, several receipt booklets were seized. The booklets indicated for example: who the receipt was made out to; the region (in this case M-5); the amount (\$40); the period (2007); and the date of the receipt (10/06/2007). These booklets are in relation to the weekly newspaper ULAHATHAMILAR.
This information comes from my review of exhibit 2008-11, item K252. (Photo 9)
*I believe that the spelling of the newspaper Ulahathamilar and Ulakathamilar are in reference to the same newspaper.
 The regions (i.e. M-5), which refers to geographical separations of the Montreal area, were explained in paragraph 10.1.1.
 I believe that these receipts show that the activities of the WTM, in this case the sale of newspapers as indicated in the LTTE Operational Manual continued in 2007, even after the LTTE was listed as a terrorist entity in April 2006.*
304. On September 3rd, 2008, INSET executed a Special Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, a receipt booklet was seized. The booklet was in reference to selling, to a Montreal business, ad space in the weekly newspaper Ulahathamilar for an amount of \$600. The date of the receipt is 01/2008.
This information comes from my review of exhibit 2008-11, item K265. (50) (Photo 11)
I believe that this is another example of how the fundraising activities of the WTM, in this case the sale of newspapers, continued in 2008, even after the LTTE was listed as an entity in April 2006.
305. On September 3rd, 2008, INSET executed a Special Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. During the search, investigators seized various folders containing documentation related to WTM. Among the items seized was a statement dated 29-Jun-2007 from the newspaper Ulahathamilar made out to Montreal branch. The statement shows various amounts starting December 31st, 2006, to June 29th, 2007. The total amount indicated on the statement is \$1,806. The address listed for the newspaper is 39 Consentino Drive, Toronto, the address of the Toronto WTM.
This information comes from my review of exhibit 2008-11, item K258 (Photo 35)
These latest examples clearly show that the activities of the WTM, notably the sale of newspapers, as dictated in the LTTE Operational Manual, continued in 2007 and 2008, well after the LTTE was listed as an entity in April 2006.

10.2.8 Fundraising Method 5- Large Fundraising Campaign by the LTTE - Tamils Savings Fund

306. On December 5th, 2005, Toronto INSET advised Montreal INSET about a new fundraising initiative by the WTM in Canada. This fundraising activity called "Tamils Savings Fund" had been established to accumulate \$100 million worldwide by the end of June 2006. The method used is to demand loans ranging from \$2,500 to \$50,000 from families, businesses and prominent members in the Tamil community.
This information was obtained from Sergeant John MACDONALD, a member of Toronto INSET, ("Sgt. MACDONALD"), as related in his investigation report dated

December 5th, 2005. (131.1)

307. On March 29th, 2006, Sgt. MACDONALD supplied Montreal INSET with a copy of the contract the WTM was using to collect the money from the Tamil community as mentioned in the above paragraph.
This information was obtained from Sgt. MACDONALD on March 29th, 2006, as referred to in Cpl. BOUDREAU's investigative report, dated March 29th, 2006. (131.2)
308. On April 13th, 2006, the Montreal RCMP executed a Search Warrant at a residence located at 7720 Pie-IX Boulevard, unit 1, Montreal. The search of the residence was successful in locating some documents relating to the Tamils Savings Plan fundraising. Among the items seized by the investigators was Tamils Savings Plan information forms identical to the document described in the above paragraph, exhibits 2006-20, items 6.1 to 6.6. These items were then supplied to Ms. GOURDEAU. A total of 676 of the Tamils Savings Plan donation contracts were filled with donator's information.
This information was obtained from the forensic accounting report of Ms. GOURDEAU, dated October 26th, 2007. (93)
The total amount received for these 676 contracts is \$194,900, which will be explained later in this section.
309. A translated version of a blank Tamils Savings Plan contract can be found below.

Tamilis' Savings Plan Tamil Elam Information Form		
Full Name:-----		
Address of Residence:-----		
Telephone:-----		
E-mail:-----		
Date of Birth:-----		
Address in Tamil Elam:-----		
Amount of Loan:-----		
Date of issuing the loan:-----		
Coordinator:-----		
First beneficiary:		
Full Name:-----		
Address:-----		
Second beneficiary:		
Full Name:-----		
Address:-----		
(Only in the absence of first beneficiary, it will be paid to the second beneficiary.)		
<p>After the 30th of July 2008, not more than 10 % of the amount will be reimbursed in rupees from the accumulated amount of the loan, with 6% interest annually. If wish to receive in the currency of the country of residence, it will be made according to the countries' rate of that day. The recipient of the reimbursement will be chosen through the draw. The interest rate will be calculated from the date of the loan.</p>		
The Creditor	Date	Coordinator
For office use:		

This information comes from my review of exhibit 2006-20, item 6.2. (94.1); and from Tamilis Savings Plan contract #7347. (94.2)

310. Also located during the search at 7720 Pie-IX Boulevard, unit 1, Montreal, were Tamils Savings Plan temporary receipts. These receipts were used to record the payment made by the donators towards the amount they pledged to donate to the LTTE. The serial number of the Tamils Savings Plan form was written on the receipt of the donator to keep track of how much was paid. While the Tamils Savings Plan form was used to collect the pledges and commit the donator to this fundraising scheme, the temporary receipts were used when collecting the money.
This information was obtained from Mr. RONDEAU as referred to in his investigation report, dated December 14th, 2006. (94.5)
A copy of a blank translated receipt (94.3) and of an actual receipt with translation is attached. (94.4)
311. In her October 26th, 2007, report, Ms. GOURDEAU explained that the Tamils' Savings Plan Information Forms indicate the amounts loaned to the WTM while the Tamils Savings Temporary Receipts indicate the amounts received by the WTM. On 676 Information Forms reviewed, 661 forms presented the amount of the promised loan for a total amount loaned of \$2,081,700. The loans ranged from \$1,000 to \$50,000, but the majority of the loans were for the amount of \$2,500. As indicated at the bottom of the Form, most loans were dated from October 2005 to April 2006. In addition, 15 of the Information Forms reviewed indicated that they were donations. In the beneficiary section, some of the donators chose to enter the name of PRABHAKARAN, the leader of the LTTE.
This information was obtained from section 3 and table 1 of Ms. GOURDEAU's report dated October 26th, 2007. (93)
312. In her report Ms. GOURDEAU summarized the findings with regards to the Tamils' Savings Plan Information Forms and Temporary Receipts as follows:

Tamils Savings Plan Information Forms			Corresponding Tamils Savings Temporary Receipts		
# of Forms	Amount	Note	# of Receipts	Amount	Note
676	\$2,081,700	Reviewed*	100	\$194,900	Reviewed*
162	\$292,900	Not Reviewed**	10	\$12,800	Reviewed*
Unknown	Unknown	Not Reviewed***	4	\$5,500	Reviewed*
838 (Total)	\$2,374,600 (Total)		114 (Total)	\$213,200 (Total)	

- * We have reviewed the paper copy and scanned copy of the documents.
 ** These forms appear to exist based on WTM's internal documentation and on corresponding receipts reviewed.
 *** These forms appear to exist based on the receipts reviewed.

This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)

313. In her report, Ms. GOURDEAU noted the unusual terms of loans made under the Tamils Savings Plan as indicated in the Information Form:
- > First, they stated that reimbursements are determined by draw;
 - > Second, that a maximum of only 10% of the loan will be reimbursed in July 2008, nothing is mentioned in regards to the other 90%.
- The report also indicates that considering the high risk of such an investment, the promised annual interest rate of 6% seems low.
- This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)**
314. In her report, Ms. GOURDEAU noted that according to the Temporary Receipts reviewed, a total of \$213,200 was collected between October 2005 and April 2006.
- This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)**
315. Several documents were located on a USB memory key seized on April 13th, 2006, at 7720 Pie-IX Boulevard, unit 1, Montreal. One of the documents found on this USB key is a spreadsheet used to keep track of the Tamils Savings Fund progress and to keep weekly tally of this fundraising. The document gave amounts starting at week 43 to week 52 and then from week 01 to week 14. Transposed on the 2005 and 2006 calendar, week 43 corresponds to the week of October 23rd, to 29th, 2005, and week 14 corresponds to the week of April 2nd, to 8th, 2006. That period of time corresponds to the date entered on the Tamils Savings contract forms filled with donators' information. For each week on the spreadsheet, amounts are entered for the following 4 categories:
1. Total no. of units written:
I believe this refers to the numbers of Tamils Savings Fund contracts filled with donators' information;
 2. Total amount written:
I believe this refers to the total amount of the pledges written on the above fundraising contracts;
 3. Total amount received:
I believe this refers to the amount of money collected to date;
 4. Total amount sent to the country:
I believe this refers to the amount of money sent to the International Secretariat.

The total amount for each of these four categories goes as follows:

1. Total no. of units written:	793
2. Total amount written:	2 414 200
3. Total amount received:	206 200
4. Total amount sent to the country:	137 000

The total amount sent to the country is compiled from four distinct entries on the spreadsheet:

This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)

313. In her report, Ms. GOURDEAU noted the unusual terms of loans made under the Tamils Savings Plan as indicated in the Information Form:

- > First, they stated that reimbursements are determined by draw;
- > Second, that a maximum of only 10% of the loan will be reimbursed in July 2008, nothing is mentioned in regards to the other 90%.

The report also indicates that considering the high risk of such an investment, the promised annual interest rate of 6% seems low.

This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)

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This information was obtained from section 3 of Ms. GOURDEAU's report dated October 26th, 2007. (93)

315. Several documents were located on a USB memory key seized on April 13th, 2006, at 7720 Pie-IX Boulevard, unit 1, Montreal. One of the documents found on this USB key is a spreadsheet used to keep track of the Tamils Savings Fund progress and to keep weekly tally of this fundraising. The document gave amounts starting at week 43 to week 52 and then from week 01 to week 14. Transposed on the 2005 and 2006 calendar, week 43 corresponds to the week of October 23rd, to 29th, 2005, and week 14 corresponds to the week of April 2nd, to 8th, 2006. That period of time corresponds to the date entered on the Tamils Savings contract forms filled with donators' information. For each week on the spreadsheet, amounts are entered for the following 4 categories:

1. Total no. of units written:
I believe this refers to the numbers of Tamils Savings Fund contracts filled with donators' information;
2. Total amount written:
I believe this refers to the total amount of the pledges written on the above fundraising contracts;
3. Total amount received:
I believe this refers to the amount of money collected to date;
4. Total amount sent to the country:
I believe this refers to the amount of money sent to the International Secretariat.

The total amount for each of these four categories goes as follows:

1. Total no. of units written:	793
2. Total amount written:	2 414 200
3. Total amount received:	206 200
4. Total amount sent to the country:	137 000

The total amount sent to the country is compiled from four distinct entries on the spreadsheet:

➤	Week 48 (Nov. 27 th – Dec. 3 rd 2005):	37000
➤	Week 05 (Jan. 29 th – Feb. 3 rd 2006):	36000
➤	Week 08 (Feb. 19 th – Feb. 25 th 2006):	42000
➤	Week 11 (Mar. 12 th – Mar. 18 th 2006):	22000

This information was obtained from a review of Mr. RONDEAU's investigation report, dated January 30th, 2007 (94.6); and my review of exhibit 2006-20, item 2.12 page 16. (94.8)

It is interesting to note the closeness in numbers between the amount reported by Ms. GOURDEAU in her report in regards to her review of the temporary receipts (\$213,200) collected, and the number indicated in the spreadsheet found the USB key (\$206,200) as indicated in appendix 4 of Ms. GOURDEAU's report dated October 26th, 2007.

316. On April 13th, 2006, investigators executed a Search Warrant at 7720 Pie-IX Boulevard, unit 1, Montreal. Of the items seized, a red folder, containing numerous Tamils Savings Plan receipts and four financial vouchers, was located. The total amount indicated on the four vouchers indicates 137 000. The four vouchers are described as follows:

- Voucher 1
 - Reason: Saving – External Expenses (Montreal)
 - Amount: 37,000
 - Date: 1-12-05
 - Signature: S. BALAN
- Voucher 2
 - Name: S. BALAN
 - Reason: Saving – (External Expenses)
 - Amount: 36,000
 - Date: 24-1-06
 - Signature: S. BALAN
 - Signature at bottom: T. MURALI
- Voucher 3
 - Name: S. BALAN
 - Reason: Saving – External Expenses (Montreal)
 - Amount: 42,000
 - Date: 19-02-06
 - Signature: S. BALAN
 - Signature at bottom: T. MURALI
- Voucher 4
 - Name: S. BALAN
 - Reason: Saving
 - Amount: 22,000
 - Date: 15-03-06
 - Signature: S. BALAN
 - Remarks: 0128, 0126, 0050, 0049, 0019, 0069, 0068, 0067, 0066, 0065, 0046, 0048, 0080, 0081.

These numbers corresponds to the Tamils Savings Plan receipts found

with the vouchers.

This information was obtained from my review exhibit 2006-20, item 2.14c, seized at 7720 Pie IX apt. 1 on April 13th, 2006. (31.1)

I believe S. BALAN is CHANDRASEGARAM as seen on some financial reports signed by CHANDRASEGARAM, the owner of 4160 and 4162 Van Horne Avenue. I also believe that T. MURALI is Muralee Karan THURAIRATNAM, the leader of the WTM.

I believe that the expressions "External Expenses" and "sent to country" are in reference to money sent to the LTTE's International Secretariat.

317. Also located on the USB key were 2 weekly reports prepared by THURAIRATNAM concerning the fundraising activities with the Tamils Savings Fund.

- The first report, dated March 28th, 2006, is from the Quebec Branch in Canada and is addressed to "Kannan". It is signed by THURAIRATNAM. It states the following:
 - The total forms written: 14;
 - The total no. of units written: 14.2;
 - The total no. of units received 4.8.
- The second report dated April 4th, 2006, is from the Quebec Branch in Canada and is addressed to "The Administrator Thamilar savings, Tamil Eelam". The caption of the report is Thamilar Saving Weekly Report and it is signed by THURAIRATNAM. It states the following:
 - The total number of units written for the week is 20;
 - The total amount written is 50,000;
 - The money received is 15,300;
 - The money sent is 0;
 - Cash in hand is 68,200.

This information was obtained from my review of exhibit 2006-20, item 2.12, pages 15 and 51. (94.9)

In the first letter, the name Kannan has been seen on other financial documents of the WTM. In exhibit 2006-12, item 01, 3/28, page 33 is an expense voucher. The name indicated on the voucher is Toronto Kannan (publication) and the reason indicated is Wannu (external expense). (100.4)

Kannan is also found on cheque 1133 from WTM to an individual named Panchalingam PARAMANATHAN for \$1,774.45. In the reference section it is indicated Kannan WTM Toronto.

The second letter is intended for the administrator of the Thamilar Savings in Tamil Eelam, the area controlled by the LTTE. I believe that these two letters show that some importance is attached to this fundraising method because updates are sent by THURAIRATNAM.

318. On April 12th, 2006, investigators seized a black binder from 4160 Van Horne Avenue, Montreal. In this binder, a handwritten document was found with numbers relating to Montreal, Toronto and Ottawa. Part of the information on this document states:
- Form – 20
 - Total amount – 50,000 20 units
 - Received – 15,300 – 6.12

Under the heading Montreal, the following numbers are written:

- 1.12.05 - 37,000
- 24.1.06 - 36,000
- 19.02.06 - 42,000
- 9.3.06 - 22,000

This information was obtained from a document found at 4160 Van Horne on April 12th, 2006, exhibit 2006-11, item 96. (94.11)

I believe that the sequence of events in the previous paragraphs shows the direct involvement of CHANDRASEGARAM and THURAIRATNAM in the Tamils Savings Plan fundraising initiative. It is also interesting to note that documentation in relation to the amount of \$137,000 "sent to the country" was located at 4160 Van Horne, WTM office, and at 7720 Pie-IX Boulevard, unit 1.

10.2.9 Fundraising method 6 – Collection through tills

319. *Tills are collection jars that are placed at different cultural and social events held by the WTM as well as in temples. Tills are in most cases plastics boxes where individuals can put money into them through a small opening at the top. The amounts generated by these collection jars are included in monthly financial statements as revenues in a category called "other income".*
320. On April 12th, 2006, investigators seized at 4160 Van Horne Avenue, Montreal, several financial documents related to the WTM's monthly activities. In a binder identified as exhibit 2006-12, item 01, 7/28, a document titled "Revenue and expenses statement for the month of August 2004" was found. Line 06 of the revenues indicates *other income* for an amount of \$3,153.35. WTM income vouchers located on pages 11 to 14 explain the origin of this source of income:
- Page 11 is a voucher for \$653.35 for funds collected through cafeteria at the sports meet;
 - Page 12 is a voucher for \$1,410.75 for money collected at the Muruga Temple through tills, dated August 25th, 2004, signed by THURAIRATNAM;
 - Page 13 is a voucher for \$592.50 for money collected at three temples on New Year day in April, signed by THURAIRATNAM;
I believe that this amount was also collected through tills at the three temples.
 - Page 14 is a voucher for \$496.75 for money collected at Our lady of Potato Church in Rigaud through tills, dated August 1st, 2004.
- This information was obtained from the August 2004 monthly financial statement found at 4162 Van Horne (113.2); and from the WTM income vouchers found on pages 11 to 14. (113.7)**
321. In April 2006, INSET investigators executed Search Warrants at 4160 and 4162 Van Horne Avenue, as well as 7720 Pie-IX Boulevard, unit 1, and [REDACTED]. A total of 15 plastic containers (tills) were seized along with an amount of

\$2,607.37. On September 3rd, 2008, INSET investigators executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal, the office of the WTM. A total of 110 plastic containers (tills) were seized. While many of these tills were empty, an amount of \$3,086.64 was seized from these tills.

This information was obtained from an investigative report by Cst. MANCINI dated March 12th, 2009. (121)

322. Of the 110 plastic containers (tills) seized on September 3rd, 2008, six of them were located in the main office area behind the front desk. Three of them contained small change, mostly pennies which totaled \$76.01. A closer look at these tills showed that five of them had a similar sticker logo on them. The sticker has a five digit number on top. In the centre of the logo, we see LTTE logo. At the bottom of the sticker, it is indicated Tamil Eelam Relief Development and Medical Fund. The sixth till has a piece of paper wrapped around it. On the paper it states in French: Help for Tsunami victims, please donate generously. The message is from the College and University Tamil students of Montreal. At the bottom, it indicates that all contributions will be sent to the TRO.

This information was obtained from my review of exhibit 2008-11, K287. (Photo 2)

I believe that the five digit number on most tills is for record keeping reasons.

As shown throughout this Affidavit, I believed the TRO to be an organization working on behalf of the LTTE.

10.2.10 Fundraising method 7 - Revenues through social and sporting events

323. The LTTE Operations Manual dictates the following fundraising initiatives under sub-section 2-2:

"If monthly financial collection proceeds correctly, a large fundraising campaign shall be abandoned. However, under the special fundraising campaign, the following may take place:

- l) By charging a fee to entertain the public through music, dance, drama and sports events help to raise funds.

This information was obtained from the LTTE Operations Manual, sub-section 2-2. (32)

Examples of this type of fundraising will be explained in section 12 for each of the sub-organizations of the WTM.

11 FUND TRANSFERS FROM THE WTM TO THE LTTE VIA THE INTERNATIONAL SECRETARIAT

324. *The money collected by the WTM in Montreal is forwarded to the LTTE through the WTM Canada branch, in Toronto, or via wire transfers by members of the WTM in Montreal to a bank account in Kuala Lumpur, Malaysia, as well as money transfer services, such as Sindi Financial. The WTM members refer to fund transfers as external expenses for the International Secretariat, or for "Vanni". In the following paragraphs I will describe some of the fund transfers to the LTTE International Secretariat, done by*

the WTM.

11.1 Other related bank accounts

325. *As explained previously and in the following paragraphs, evidence has been found in regards to fund transfers between the WTM and the WTM in Toronto, as well as with the World Tamil Relief Fund bank account in Malaysia. I believe that both these accounts are used to fund the LTTE in Sri Lanka.*

11.1.1 WTM Ontario

326. During Toronto INSET's investigation, investigators have identified 20 accounts in Canada related to WTM Ontario and its sub-organizations: 10 with Toronto Dominion financial group; 1 with Bank of Nova Scotia; 4 with Canadian Imperial Bank of Commerce; 2 with the National Bank of Canada; and 3 with the Royal Bank of Canada. Of these three with the Royal Bank, one in particular is related to the WTM in Montreal: account #06222-1276294, at 650 Danforth Avenue, Toronto. I have obtained that information from Tab 2 of a report by Cpl. HILL entitled "Report on financial document World Tamil Movement of Ontario" dated May 08th, 2007. (96.2)

11.1.2 [REDACTED]

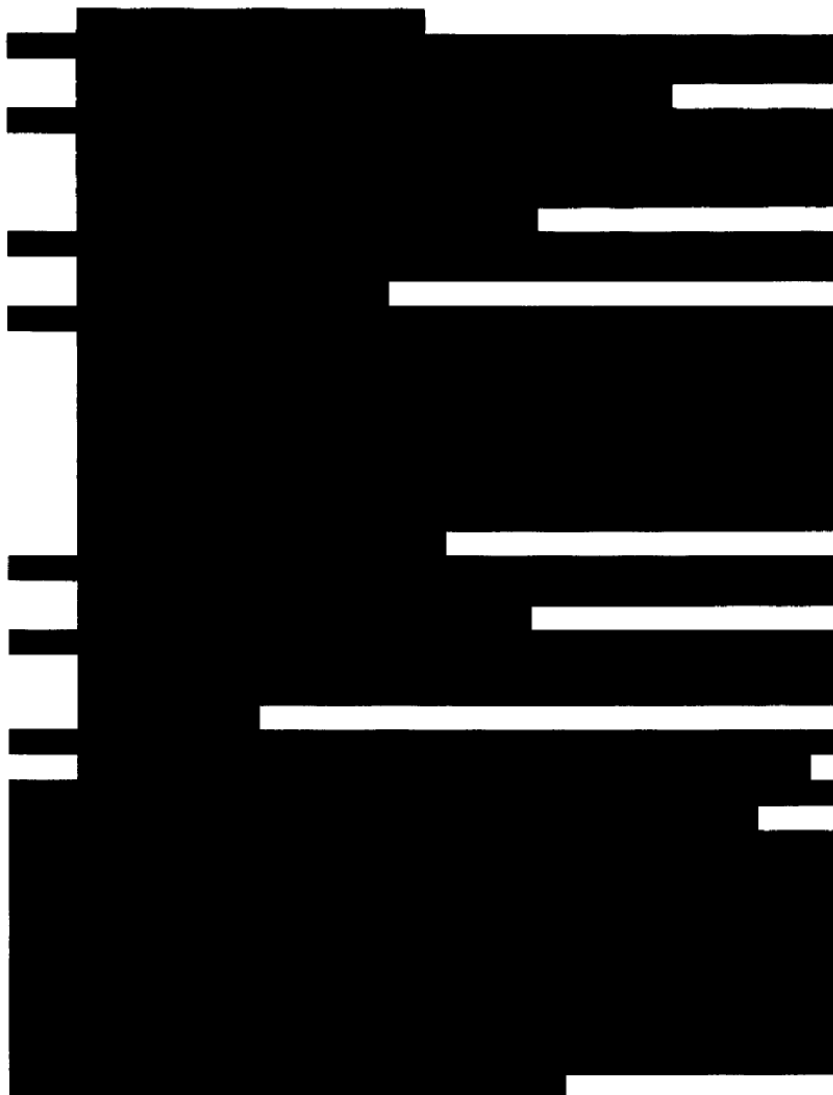
327. [REDACTED]

328. [REDACTED]

[REDACTED]

329.

[REDACTED]



11.2 Fund transfer - September 2004 - \$24,000

330. On April 12th, 2006, police investigators seized financial documents from 4162 Van

Horne Avenue, Montreal. One of the documents seized was the WTM financial report for the month of September 2004. The one-page report is contained in a duo tang binder along with 36 pages of source documents relating to the transactions mentioned in the financial report. The report was prepared by Murali, identified as the person responsible for the Finance Division, Quebec Branch in 2004. Murali is the present leader of the WTM and was the bookkeeper for the organization in 2004. On line 8 of this report, an amount of \$24,000 is reported as external expenses for September 2004. The reason provided on the report indicates the LTTE International Secretariat. This fund transfer to the LTTE was done in two different groups of transactions which are described in paragraphs 11.2.1 and 11.2.2.

This information was obtained from a WTM financial report for the month of September (84.2) and from Cpl. BOUDREAU's investigative report, dated July 13th, 2006. (84.3)

11.2.1 Transfer of \$7,000 via WTM Toronto to the International Secretariat in September 2004

331. On page 24 of the financial report for September 2004 is a WTM expense voucher dated September 13th, 2004, made in the name of GOBU and the reason for the expense given is International Secretariat. The amount written is \$7,000 and the document is signed by T. MURALI. A note at the bottom portion of the document states that "In order to send money, withdraw from the bank". This note indicates that the \$7,000 transfer involved banking transaction(s).

This information was obtained from the WTM expense voucher dated September 13th, 2004 (84.6) and from Cpl. BOUDREAU's investigative report, dated July 13th, 2006. (84.3)

I believe T. MURALI to be THURAIRATNAM.

I believe GOBU to be Nanthagobal THAVALCHELVAM.

332. On page 9 of the Montreal WTM monthly financial report for September 2004 is a list of the cheques written on the WTM TD bank account #4336-0928569 for the month of September 2004. Although they were made payable to cash, cheques #1095 and #1096 in the amounts of \$3,500 each are listed as having been issued to the Toronto WTM. The report mentions that cheque #1096 was returned when, in fact, it was cheque #1095 that was returned for non sufficient funds. Cheque #1102 is listed as having been issued to the Toronto WTM to replace the returned cheque. The endorsement on the cheques indicates that they were deposited into account #1276294, at the Royal Bank located at Pope and Danforth in Toronto. This account is held by the Toronto WTM.

This information was obtained from page 9 of the WTM monthly report ((84.7); the cheque numbered #1095 (95.1); from cheque #1096 (95.2); cheque #1102 (95.3).

333. The bank statements for the WTM TD bank account #4336-0928569 indicate a \$7,030 debited from the account for a wire transfer on September 7th, 2004. This wire transfer of \$7,030 includes a \$30 service fee from the bank. The funds were debited from the WTM TD bank account #4336-0928569 and credited to the bank account of the World Tamil Relief Fund at the Bumiputra Commerce Bank in Kuala Lumpur, Malaysia. The above described \$7,000 wire transfer was returned and credited to the WTM TD Canada

Bank, on September 23rd, 2004. The bank document relating to this transaction states that this was done upon the request of the WTM. It is unknown why the wire transfer to the World Tamil Relief Fund in Malaysia was cancelled by the WTM.

This information was obtained from the WTM TD bank statement (91.3); and from the wire payment service receipt (95.4).

Therefore, the WTM sent \$7,000 to the World Tamil Relief Fund via wire transfer in Malaysia and then cancelled the transfer. Two cheques totalling \$7,000 were then sent from WTM Montreal to WTM Toronto. One of these cheques was returned for non-sufficient funds, and a third cheque was written to the WTM Toronto to replace it.

11.2.2 Transfer of \$17,000 via WTM Toronto to the International Secretariat in September 2004

334. As stated earlier in this Affidavit, on April 12th, 2006, investigators executed a Search Warrant at 4162 Van Home Avenue. Among the items seized, there was:

➤ A WTM financial report for September 2004. On page 23 of this report, there is a WTM expense voucher dated September 21st, 2004, for \$17,000. The name on the voucher is GOBU. The reason stated is International Secretariat. The voucher states that the amount was provided by three WTM activists;

- \$7,000 from Mani, who I believe is Manivannan KARUNANANTHASWAMY;
- \$5,000 from S. BALAN who I believe is CHANDRASEGARAM;
- \$5,000 from Ganesh who I believe is Ganeswaran Sockanathan.

A handwritten note on the document indicates "sent by Royal Bank to WTM Toronto, account 06222 1276294".

In the remarks portion of the voucher, the funds provided were noted as follows:

- | | |
|---|---------|
| • Paid by Mani for Indran's funeral expenses | \$7,000 |
| • Ganesh (M6) | \$5,000 |
| • S. BALAN (elder brother) [Sivananthan Master (teacher)] | \$5,000 |

This information was obtained from my review of a WTM financial report for September 2004, exhibit 2006-12, Item 01, Sector 8, 2nd floor, 6/28. (84.3)

Although the third amount seems to have been provided by S. BALAN, I believe that the notation on the expense account indicates that the funds were provided by Sivananthan Master (teacher).

335. This \$5,000 credit from Ganeswaran SOCKANATHAN was repaid by the WTM on March 16th, 2005. The banking records of the WTM TD bank account #4336-0928569 show that cheque #1141, dated March 14th, 2005, in the amount of \$5,000, was made payable to Ganeswaran. The note on the cheque states that the cheque was in order to repay Ganesh's loan.

This information comes from a T.D. Canada Trust statement for account #0928569, for the period of February 28th, 2005, to March 18th, 2005 (91.2); and from cheque 1141 found in exhibit 2006-12, item 08, 1 of 1. (91.14)

336. The \$5,000 identified to Sivananthan Master comes from the TEEDOR loan, contract #0320, dated September 22nd, 2004. The contract states that, on March 7th, 2005,

MUTHUKUMARU "received the amount paid as loan".

This information comes from exhibit 2006-12, item 01, Sector 8, 2nd floor, 25/28 (85.3)

This transaction was explained in details in section 10.2.6.

This fund transfer was made by using the Toronto WTM bank account # 06222-1276294 at the Royal Bank. This fund transfer to the Toronto WTM was recorded by the Quebec branch of the WTM as going to the International Secretariat. Therefore, I believe that the above described two transactions totalling \$24,000 represent fund transfers from the WTM to the International Secretariat through Toronto WTM.

11.2.3 Related transactions of the Toronto WTM September 2004 - \$30,000

337. On April 11th, 2006, during a police surveillance of the office of the WTM located at 4160 and 4162 Van Horne Avenue, Montreal, investigators observed people carrying boxes of documents outside the building and placing them in a vehicle. THURAJIRATNAM, the leader of the WTM was observed along with unidentified males, bringing boxes of documents from the WTM to a municipal recycling depot located at 6925 chemin Côte-des-Neiges, Montreal. The documents were dumped into a recycling bin by the leader of the WTM and his associates. Several of those documents were recovered and seized by police investigators.
This information was obtained from Cpl. NEUWIRTH's report, dated April 19th, 2006 (47.2); and from Cpl. CLOUTIER's report dated April 11th, 2006. (47.1)
338. Located among these documents was a Royal Bank fund transfer form for a wire transfer in the amount of \$30,000, dated September 16th, 2004. The funds were sent by the Toronto WTM and the amount was debited from the Toronto WTM account #06222-127-629-4 at the Royal Bank. The beneficiary of the transfer was the World Tamil Relief Fund, account #14020175670050 at the Bumiputra Commerce Bank in Kuala Lumpur, Malaysia.
This information was obtained from a copy of the Royal Bank fund transfer, dated September 16th, 2004 (71.3); and from Cpl. CLOUTIER's investigative report, dated August 18th, 2006. (71.4)

11.3 October 2004 - \$15,000 transfer from the WTM to the LTTE via the International Secretariat.

339. The financial report of the WTM for October 2004 was seized at 4162 Van Horne Avenue, Montreal. The first two pages represent the Financial Statement for the month of October and the remaining pages are the source of documents associated to the revenues and expenses for the month of October 2004. The report was prepared by MURALI, identified as the person responsible for Finance Division, Quebec Branch. On line 8 of the financial statement is an amount listed as \$15,000 and described as being external expenses.
This information was obtained from the financial statement for the month of October, exhibit 2006-12, item 01, Sector 8, 2nd floor, 5/28 (94.2); and from Cpl. BOUDREAU's investigative report, dated July 12th, 2006. (94.1)
I believe MURALI to be THURAJIRATNAM.

340. On page 26 of that same report is a WTM expense voucher made out to External expenses Gobu. The reason for this external voucher is given as Vanni and the amount is \$15,000. The term Vanni is a reference to the northern central area of Sri Lanka, which is under the military control of the LTTE. This document was used by the WTM in Montreal to register operating expenses and fund transfers. The voucher is dated October 31st, 2004, and is signed by CHANDRABALAN who is CHANDRASEGARAM. On the bottom part of the document, the following notations are handwritten;

- (a) Sent to Gobu;
- (b) 18-10-04 2,500 (S. Balan);
- (c) Tills 5,000 Kumar
- (d) (Mani) Bank 5,000 Das
12,500
- (e) (2,500)Debt

The above notations can be explained as follows:

- (a) Gobu was identified as Nanthagobal THAVALCHELVAM who is a Sri Lankan citizen of Tamil descent. This person was in Canada in 2004 on a visitors Visa and working with the WTM branches across Canada until his deportation on December 6th, 2004;
This information was obtained from Cpl. CLOUTIER's investigative report, dated January 22nd, 2007. (98)
- (b) This notation corresponds to a bank deposit slip located on page 23 of the WTM financial statement for October 2004. This bank document indicates that on October 18th, 2004, an amount of \$2,500 was deposited into bank account #0622-003-127-629-4 held by the Toronto WTM at the Royal Bank. The deposit slip had the account number pre-printed on them which indicates that they were supplied by the Toronto WTM. The funds were deposited in a Montreal branch of the Royal Bank and the depositor's initial are T.C. Those letters correspond to the initial of CHANDRASEGARAM of the Quebec branch of the WTM. The name S. BALAN has also been identified as being CHANDRASEGARAM;
This information was obtained from a Royal Bank Deposit Slip seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006. (99.4)
- (c) According to the WTM monthly statement for October 2004, an amount of \$5,000 was borrowed from Kumar, a member of the WTM. This transaction was recorded on a WTM income voucher, dated October 6th, 2004. The document is signed by T. Murali who was identified as THURAIRATNAM. The following notation is handwritten at the bottom of the form under the caption "For office use only and Remarks": "Through till sent to Toronto by CHANDRABALAN". This loan to the WTM by Sebastiampillai THOMAS, a WTM administrator, is also recorded on a TEEDOR loan contract #321 also dated October 6th, 2004;
This information was obtained from a WTM external expense report, dated October 6th, 2004 (99.3); a TEEDOR contract 0321, 2006-12, item 01, Sector 8, 2nd floor, 25/28 (85.4); and from a WTM income voucher. (99.5)
*I believe that Kumar is Sebastiampillai THOMAS.
I believe this transaction is another example of how the TEEDOR loans are just*

another fundraising initiative of the LTTE as it is controlled by the WTM in Canada. CHANDRABALAN is in fact CHANDRASEGARAM.

- (d) This \$5,000 amount with the name Das and the name Mani in brackets represents another loan made by the WTM. The name Mani refers to KARUNANANTHASWAMY, the WTM leader in 2004. This transaction is referred to in the WTM monthly financial statement for October 2004. A WTM Montreal income voucher states that \$10,000 was received on credit from a person identified as Subramaniadas:

- 5000 Toronto Bank;
- 5000 (Mani for funeral expenses of Indran)

The "\$5,000 Toronto Bank" notation corresponds to a bank deposit of \$5,000 made into the Royal bank account #0622-003-127-629-4 held by the Toronto WTM on October 13th, 2004;

This information was obtained from a WTM external expense report, dated October 6th, 2004 (99.3); from an income voucher for \$10,000 (99.6); and from a TEEDOR contract 0322, 2006-12, Item 01, Sector 8, 2nd floor, 25/28 (85.5)

As for the other \$5,000 deposit, it is interesting to note that there is a \$5,000 TEEDOR loan contract #0322 dated the same day, October 13th, 2004.

- (e) There is no supporting documentation for this \$2,500 amount other than it was borrowed as indicated by the notation "debt".

11.4 December 2004 - \$10,000 transfer from the WTM to the LTTE via the International Secretariat

341. The financial statement for the month of December 2004 of the WTM was prepared by THURAIRATNAM, identified as the person responsible for Finance Division, Quebec Branch. The 33 page document is contained in a duo tang binder with December 2004 written on the cover (exhibit 2006-12, item 01, sector 8, 3/25).

This information was obtained from: a financial statement for the month of December 2004, page 1 of exhibit 2006-12, item 01, Sector 8, 2nd floor, 3/28, (100.3); and from Cpl. BOUDREAU's investigative report, dated May 30th, 2006. (100.2)

342. On line 8 of the financial statement of December 2004, an amount of \$10,000 is reported as external expenses. Attached to the report are the WTM internal documents, justifying the reported transactions. A WTM expenses voucher, located on page 33 of the report, states that \$10,000 was forwarded to "Toronto Kannan" for "Wanni" as external expenses. The source of the money is written down at the bottom of the expenses voucher as follows:

- (a) Anton \$5,000 cheque
- (b) Murali \$1,000 cash
- (c) Heroes fund \$580 cash

- (d) Flood relieve \$740 cash - Area 7
- (e) Flood relieve \$2,130 cash - Area 7
\$9,450
- (f) Carrols \$550 - Area 7
\$10,000

This information was obtained from: a financial statement for the month of December 2004, page 1 of exhibit 2006-12, item 01, Sector 8, 2nd floor, 3/28, (100.3); from a WTM expense voucher, page 33 of exhibit 2006-12, item 01, Sector 8, 2nd floor, 3/28 (100.4); and from Cpl. BOUDREAU's investigative report, dated May 30th, 2006. (100.2)

As explained earlier, I believe that the term Wannai (or Vanni) is used by Tamils to refer to the northern central area of Sri Lanka, which is under the military control of the LTTE. I also believe that every mention of expenditures going to external expenses is in fact going to the International Secretariat in Vanni, the area controlled by the LTTE at that time.

- (a) TD banking records of the WTM show that cheque #1121, dated December 22nd, 2000 (should be 2004), in the amount of \$5,000, was made payable to the WTM. The WTM monthly report for December 2004 refers to cheque #1121 for \$5,000 as given to the Toronto WTM. The cheque was deposited by MANICKAM into account #6704018 of the Toronto WTM, held at the Canadian Imperial Bank of Commerce, located at 939 Lawrence Avenue East, North York, Ontario;
This information was obtained from the TD Canada Trust bank statement from December 20th, 2004, and December 31st, 2004 (91.9); and a financial sheet listing 5 cheques in December 2004. (100.5)
 - (b) There is no explanation as to the origin of this \$1,000 in cash attributed to THURAIRATNAM.
 - (c) *I believe that "Heroes fund" refers to revenues from propaganda events held by the WTM, every 27th of November, in honour of LTTE dead fighters considered as martyrs by the LTTE;*
This information was obtained from the WTM external expenses. (100.4); and from a note entitled payment (100.7)
 - (d) *I believe that the amount from the Flood relief represents cash donations collected from the public after the Tsunami of December 26th, 2004;*
This information was obtained from the WTM external expenses. (100.4)
 - (e) Same as above;
This information was obtained from the WTM external expenses. (100.4)
 - (f) A document located on page 29 of the financial statement accounts describes the source of this money as "Carrol in Montreal Area 07".
This information was obtained from the WTM external expenses. (100.7)
343. On page 32 of the WTM financial statement for December 2004, there is a financial voucher titled "Certificate of Money Received", Receipt #1908. This document gave a cash money count for the \$5,000 listed above (b to f) and for the \$5,000 cheque (a). The document states that the money was paid by THURAIRATNAM from the Finance

Division of Quebec, through the Quebec Branch (external expense) Medical Fund. The document is dated December 26th, 2004.

This information was received from financial voucher titled "Certificate of Money Received". (100.6)

11.5 \$3,000 transfer from the WTM to the Toronto WTM

344. On April 12th, 2006, police investigators seized financial documents of the WTM from 4162 Van Horne Avenue, Montreal. One of the item seized was a binder containing the bank statements and cheques written on the WTM TD bank account #4336-0928569. The item includes the original copies of the monthly statements and of the processed cheques by the banking system for the period of March 31st, 2004, to November 30th, 2005. One of these statements dated April 29th, 2005, to May 20th, 2005, shows that cheque #1154 was debited on May 19th, 2005.
This information was obtained from a TD bank monthly statement TD bank. (91.4)

345. Cheque #1154, dated May 17th, 2005, for \$3,000 was drawn from the WTM TD bank account #4336-0928569 and made payable to the Toronto WTM. The cheque was deposited into account #327-520-3094 at the TD Canada Trust Bank, located at 26 William Kitchen Road, Scarborough, Ontario, on May 18th, 2005. This account is held by the WTM of Ontario. There is no justification for this cheque in the WTM financial reports. "Paper Kamal" was written in the remarks portion of the cheque.
This information was obtained from the review of cheque #1154, exhibit 2006-12, item 08 (91.5); and from Tab 2 of a report by Cpl. HILL entitled "Report on financial document World Tamil Movement of Ontario" dated May 08th, 2007. (96.2)
I believe that the above described transaction represents a clear cut fund transfer from the WTM to the Toronto WTM.

11.6 May to October 2005 - \$105,000

346. I have completed a review of the financial report for the months of May to October 2005 of the WTM. The report was prepared to cover the 6 month period as no monthly reports were done. An amount of \$105,000 is reported as external expenses which, I believe, is a reference to the amount of money transferred to the International Secretariat from the WTM during that period. I also completed a review of a handwritten financial report. In this version, they also reported \$105,000 as external expenses and they listed the transfer payments under the heading "Country" which, I believe, is a reference to Tamil Eelam. The payments included in the external expenses are as follows:

>	June 21 st , 2005	Mathy	\$10,000
>	June 30 th , 2005	Mathy	\$10,000
>	July 8 th , 2005	Mathy	\$25,000
>	July 25 th , 2005	Mathy	\$10,000
>		Mathy	\$32,000
>		<u>To Yogamalar</u>	<u>\$18,000</u> (as instructed by Mathy)
		Total	\$105,000

This information was obtained from the review of a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, item 01, Sector 8, 2nd floor, 14/28 (101.3); and from a handwritten financial report found on page 29 of exhibit 2006-12, item 01, 13/28 (102.3).

347. The name Mathy is the abbreviation for MATHIYARASAN, who is mentioned in WTM correspondence, as the person responsible for finance matter of the LTTE. The funds, as stated in the correspondence, were being sent to MATHIYARASAN. The name Yogamalar refers to Mrs. Yogamalar SRIRANJAN of 5111 Barclay Avenue, unit 6, Montreal. This person was given \$18,000 by CHANDRASEGARAM on August 31st, 2005, upon the request made by MATHIYARASAN of the LTTE International Secretariat. **This information was obtained from a letter dated August 21st, 2005, page 34, exhibit 2006-12 item 1, 27/28 (37.5); from a letter dated July 27th, 2005, page 45, exhibit 2006-12 item 1, 27/28(37.4); and from Cpl. BOUDREAU's Investigative report, dated October 19th, 2006. (37.2)**
348. *I have completed a review of the documents representing the above described fund transfers in the financial reports of the WTM. Those documents are enumerated in the following paragraphs:*

11.6.1 June 21st, 2005, Mathy \$10,000

349. A document titled "Wire payment services TD Canada Trust", dated June 21st, 2005, in the amount of \$10,000 plus \$30 service fees, was reviewed. The ordering customer was CHANDRASEGARAM of [REDACTED] CHANDRASEGARAM holds a bank account at the TD Canada Trust Bank located at 8200 Decarie, Montreal. The bank account number is #359-6270618 ("CHANDRASEGARAM's TD Canada bank account"). The beneficiary was Aramex International Exchange of Singapore and the beneficiary bank was the United Overseas Bank, head office in Singapore. The beneficiary account number was #35-29-00-46-70. The amount was paid in cash by the ordering customer.
This information was obtained from a wire transfer dated June 21st, 2005, page 20, exhibit 2006-12 item 1, 27/28(37.6); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)
In a financial report, the WTM referred to this transfer as being sent to the country which I believe is the International Secretariat. (102.3)
Aramex International Exchange will be explained in an upcoming paragraph.
350. A review of the banking records for CHANDRASEGARAM's TD Canada bank account 6270618 identified the following transactions related to the wire transfer of June 21st, 2005:
- On June 20th, 2005, at 10:21am, CHANDRASEGARAM made a \$6,000 cash deposit into his account;
This information was obtained from a bank record dated June 20th, 2005, exhibit 2007-09(103.1); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)
 - On June 20th, 2005, at 4:31pm, CHANDRASEGARAM made a \$4,000 cash

deposit into his account;

This information was obtained from a bank record dated June 20th, 2005, exhibit 2007-09 (103.2); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

- On June 21st, 2005, at 02:17am, CHANDRASEGARAM ordered and paid for a \$10,000 wire Transfer. He identified himself with his Quebec drivers licence #C5368-201072-07. Then, \$10,030 was transferred from CHANDRASEGARAM's TD Canada Trust bank account to the TD Canada Trust wire payment services account to cover the fund transfer to Aramex International Exchange and the \$30 bank fees.

This information was obtained from a bank record dated June 21st, 2005, exhibit 2007-09 (103.3); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

The Aramex account #35290046 in Singapore is also listed as a related bank account of the WTM Ontario as indicated in tab 2 of a report by Cpl. HILL entitled "Report on financial document World Tamil Movement of Ontario" dated May 06th, 2007. (96.2)

I believe that the two cash deposits made on June 20th, 2005, by CHANDRASEGARAM were to avoid being questioned by the bank staff as to the purpose of the transfer if a deposit of the amount of \$10,000 in cash was made.

351. Aramex International Exchange is listed as a money changer company in the business directory of the Singapore Mirror website. The company gives its address as 1 North Bridge Road, #01-20, High Street Centre, Singapore 179094. Telephone #6338 0444, Fax #6338 2444.

This information was obtained from a website query conducted by Cpl. BOUDREAU on August 10th, 2006. (104)

11.6.2 June 30th, 2005, Mathy \$10,000

352. A document titled "Wire payment services TD Canada Trust", dated June 30th, 2005, in the amount of \$10,000 plus \$30 service fees was reviewed. The ordering customer was CHANDRASEGARAM of [REDACTED]. The beneficiary was Aramex International Exchange of Singapore and the beneficiary bank was the United Overseas Bank, head office in Singapore Beneficiary account #35-29-00-46-70. The amount was paid in cash by the ordering customer.

This information was obtained from a wire payment receipt (37.7) and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

In a financial report the WTM referred to this transfer as being sent to the country which I believe is the International Secretariat. (102.3)

353. A review of the banking records for CHANDRASEGARAM's TD Canada bank account, exhibit 2007-09, identified the following transactions as related to the wire transfer of June 30th, 2005:

- On June 29th, 2005, at 4:06pm, CHANDRASEGARAM made a \$4,000 cash deposit into his account;

This information was obtained from a bank record dated June 29th, 2005, exhibit 2007-09 (103.4); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

- On June 30th, 2005, at 12:04pm, CHANDRASEGARAM made a \$6,000 cash deposit into his account;
This information was obtained from a bank record dated June 30th, 2005, exhibit 2007-09 (103.5); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

I believe that the two cash deposits made on June 29th, and June 30th, 2005, by CHANDRASEGARAM were to avoid being questioned by the bank staff as to the purpose of the transfer if a deposit of the amount of \$10,000 in cash was made.

- On June 30th, 2005, at 12:30pm, CHANDRASEGARAM ordered and paid for a \$10,000 wire Transfer. He identified himself with his Quebec drivers licence #C5368-201072-07. Then, \$10,030 was transferred from CHANDRASEGARAM's TD Canada bank account to the TD Canada Trust wire payment services account to cover the fund transfer to Aramex International Exchange and the \$30 bank fees.
This information was obtained from a wire payment receipt dated June 30th, 2005, exhibit 2007-09 (103.6); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

11.6.3 July 8th, 2005, Mathy \$25,000

- 354. On April 12th, 2006, a duo tang binder containing 64 pages of documents relating to fund transfers to the LTTE via International Secretariat was seized at 4162 Van Horne Avenue, Montreal (exhibit 2006-12, item 01, sector 8 27/28):

- On page 18 of this duo tang binder is listed a fund transfer document from the Royal Bank of Canada located at the intersection of Van Horne Avenue and Victoria, Montreal. This document refers to a wire transfer dated July 8th, 2005, in the amount of \$25,000 with a \$45 service fee. The ordering customer was CHANDRASEGARAM of [REDACTED]. The beneficiary was Aramex International Exchange of Singapore, and the beneficiary bank was the United Overseas Bank, head office in Singapore. The beneficiary account number was #35-29-00-46-70. The amount was paid in cash by the ordering customer. In their financial report for the months of May to October 2005, the WTM referred to this transfer as part of their External expenses. The wire payment services form located with the WTM fund transfer documents had the name Murali handwritten on the top front of it;

This information was obtained from a review of the Royal funds transfer, dated July 8th, 2005 (37.9); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

Murali is known in this investigation as Muralee Karan THURAIRATNAM, the leader of the WTM since early 2005.

- On page 15 of the above described duo tang binder is found a handwritten

document dated August 14th, 2005. This document lists 4 amounts which are described as "Sent to Mathy including the cost of sending". The fourth amount is \$25,045 with the corresponding date of 08-08-2005. It appears that the author of this handwritten document made an error with the date and wrote 08-08-2005 instead of 08-07-2005 as stated in the Royal Bank wire transfer dated July 8th, 2005. The amount (\$25,045) corresponds to the wire transfer made by CHANDRASEGARAM to Aramex International Exchange on July 8th, 2005, and as described in the above paragraph.

This information was obtained from as review of a WTM document (37.10); from a review of a Royal Bank statement from June 21st, 2005, to July 27th, 2005 (97.2); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)

Because all related money transfers were located in this same binder and that no money transfer was found for August 8th, 2005, I believe that the above noted money transfer was done on July 8th, 2005, and that the handwritten note was in fact an error.

355. On June 28th, 2005, Cheque #1159 and #1158 were issued to CHANDRASEGARAM from the WTM TD bank account #4336-0928569. Both cheques were in the amount of \$6,000 each.
This information was obtained from a review of cheque #1158, exhibit 2006-12, item 08 (91.6); from my review of cheque #1159, exhibit 2006-12, item 08 (91.8); and from my review of a TD account statement from June 30th, 2005 to July 20th, 2005. (91.7)
356. A review of the banking records for CHANDRASEGARAM's Royal bank account, identified the following transactions related to the wire transfer of July 8th, 2005:
- On June 30th, 2005, the above described cheques from the WTM totalling \$12,000 were deposited by CHANDRASEGARAM into his account #06301-8230864 held at the Royal Bank. The cheques were part of a \$12,158.88 deposit. The account balance prior to this deposit was \$1,664.21;
This information was obtained from a review of a Royal Bank statement from June 21st, 2005, to July 27th, 2005 (97.2); and from an RBC transaction receipt dated June 30th, 2005. (97.3)
 - On July 7th, 2005, CHANDRASEGARAM made a \$9,000 cash deposit at the Royal Bank. He used \$100 from that amount to pay a bill and deposited the remaining \$8,900 into his account #06301-823086. Prior to this transaction, the account balance was \$14,858.65 and the deposit brought the account balance up to \$23,758.65;
This information was obtained from a review of a Royal Bank statement from June 21st, 2005, to July 27th, 2005 (97.2); and from an RBC transaction receipt dated July 7th, 2005. (97.4)
 - On July 8th, 2005, CHANDRASEGARAM made a deposit of \$3,264 in his account #06301-823086 held at the Royal Bank. This deposit included \$3,000 in cash and a cheque for \$264. This transaction brought the account balance to \$26,459.36;

This information was obtained from a review of a Royal Bank statement from June 21st, 2005, to July 27th, 2005 (97.2); and from an RBC transaction receipt dated July 7th, 2005. (97.5)

- On July 8th, 2005, CHANDRASEGARAM ordered a \$25,000 fund transfer from his account #06301-8230864 held at the Royal Bank. The funds were transferred to account #35 29 00 46 70 held by ARAMEX International Exchange at the United Overseas Bank in Singapore. Although they were smaller deposits made to the bank account of CHANDRASEGARAM since June 28th, 2005, the majority of the funds used for this transfer to Singapore was provided by the WTM and by cash deposits. The banking fee for this transfer was \$45 which brings the total amount debited from the account of CHANDRASEGARAM to \$25,045;

This information was obtained from a review of a Royal Bank statement from June 21st, 2005 to July 27th, 2005 (97.2); from a review of the Royal funds transfer, dated July 8th, 2005 (37.9); and from an RBC fund transfer dated July 8th, 2005. (97.6)

- The above described \$25,000 fund transfer was recorded in the WTM financial report for the period of May to October 2005 as External expense. The transaction is listed with the date of 8-07-05 and the name "Mathy annai". The WTM recorded the full amount of the wire transfer, including the cost of sending the money, in their financial record.

This information was obtained from a WTM financial report for the period of May to October 2005, exhibit 2006-12, item 01, 14/28. (101.3)

This demonstrates that part of the amount of the transfer was supplied by the WTM through CHANDRASEGARAM and was sent to the Aramex International Exchange, in Singapore.

11.6.4 July 25th, 2005, Mathy \$10,000

357. On April 12th, 2006, a duo tang binder containing 64 pages of documents relating to fund transfers to the International Secretariat by the WTM was seized at 4162 Van Horne Avenue, Montreal (exhibit 2006-12, item 01, sector 8 27/28). The following relevant documents related to this transaction were found in this binder:

- On page 22 of this duo tang binder is a wire payment document from the TD Canada Trust branch 4336, located at 8200 Decarie Boulevard, Montreal. This document refers to a wire transfer dated July 25th, 2005, in the amount of \$10,000 plus \$30 service fees. The ordering customer was CHANDRASEGARAM of [REDACTED]. The beneficiary was Aramex International Exchange of Singapore and the beneficiary bank was the United Overseas Bank, head office in Singapore. The beneficiary account number was #35 29 00 46 70. The amount was paid in cash by the ordering customer. In their financial report for the months of May to October 2005, the WTM referred to this transfer as part of the External expenses. The wire payment services form located with the WTM fund transfer documents had the name Murali handwritten on the top right corner;

This information was obtained from a wire payment receipt (37.8) and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)
Murali is known in this investigation as THURAIRATNAM, the leader of the WTM since early 2005.

- On page 15 of the above described duo tang binder is a handwritten document dated August 14th, 2005. This document lists 4 amounts which are described as "Sent to Mathy including the cost of sending". The third amount is \$10,030 with the corresponding date of 25-07-2005. The amount and the date correspond to the wire transfer made by CHANDRASEGARAM to Aramex International Exchange on July 25th, 2005, and as described in the above paragraph;
This information was obtained from a document dated August 14th, 2005 (37.10); and from Cpl. BOUDREAU's investigative report, dated October 19th, 2006. (37.2)
 - On page 14 of the duo-tang binder is a WTM income voucher. This document is a form used by the WTM to register incomes for their accounting. The voucher is made to the name of Suresh and the reason for the income is given as Bank. The amount is \$5,432.85 and the date is 12-07-05. The document is signed by S. Balan who is CHANDRASEGARAM.
This information was obtained from the WTM incomes voucher. (37.11)
In the next paragraph, I will explain how the money from Ottawa (Suresh) destined to WTM was sent through CHANDRASEGARAM's account.
358. A review of the banking records for CHANDRASEGARAM's TD Canada bank account, #359-6270618 (exhibit 2007-09) identified the following transactions related to the wire transfer of July 25th, 2005:
- On July 12th, 2005, an amount of \$5,432.85 was transferred into CHANDRASEGARAM's account #359-6270618 at the TD Bank. The funds were transferred from account #3288-3121129 held by Suren T. S. at a TD Canada Trust branch in Ottawa. This amount is recorded in the financial statement of the WTM for the period of May to October 2005. The \$5,432.85 is listed as the income received from the Ottawa Branch in July 2005;
This information was obtained from the TD Bank account history (103.8); and from the review of a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, Item 01, Sector 8, 2nd floor, 14/28 (101.3).
I believe that Suren T.S. is Thamberajah SURENDRAN, the WTM leader for the Ottawa Branch. I also believe SURENDRAN to be known as Suresh.
 - On July 15th, 2005, at 1:57pm, CHANDRASEGARAM made a \$4,000 cash deposit into his account #359-6270618 held at the TD Bank;
This information was obtained from the bank transaction record dated July 15th, 2005 (103.9); and from TD Bank account history. (103.8)
 - On July 15th, 2005, at 2:22pm, CHANDRASEGARAM ordered a \$3,500 USD wire transfer. The amount of the transaction in Canadian dollars including bank fees was \$4,362.65 which was debited from CHANDRASEGARAM's account #359-

6270618. The beneficiary of the wire transfer was Viva Entertainment of 59A Murray Street, Rahway, New Jersey, USA. The wire transfer was credited to account #2000004675251 held at the Wachovia Bank - Colonia Financial Center located at 526 Inman Avenue, Colonia, New Jersey, USA;

This information was obtained from the bank transaction record dated July 15th, 2005 (103.10); and from TD Bank account history. (103.8)

➤ On July 25th, 2005, at 1:58pm, CHANDRASEGARAM made a \$5,000 cash deposit into his account #359-6270618 at the TD Bank;

This information was obtained from a bank statement record dated July 25th, (103.11); and from TD Bank account history. (103.8)

➤ On July 25th, 2005, at 2:18pm, CHANDRASEGARAM ordered a \$10,000 wire transfer. The amount of the transaction including the banking fees was \$10,030 which was debited from account #359-6270618. The beneficiary of the wire transfer was ARAMEX International Exchange as described in a previous paragraph.

This information was obtained from a bank transaction dated July 25th, 2005 (103.12); from a wire payment receipt (37.8); and from TD Bank account history. (103.8)

I believe that the above described transactions demonstrate a link between the Ottawa Branch of the WTM and WTM in Montreal. The Ottawa WTM leader transferred \$5,432.85 into the bank account of a member of the WTM who makes funds transfer to the LTTE International Secretariat. Before making the transfer to the LTTE, CHANDRASEGARAM made himself a \$4,000 cash deposit to cover a wire transfer to Viva Entertainment, a movie distribution company in the USA. The investigation has not linked this transaction to funds transfer for the LTTE but it shows that the money received from the Ottawa WTM, or part of the money received, was not used for that transaction. It was added to a \$5,000 cash deposit made by CHANDRASEGARAM on July 25th, 2005, to make another wire transfer of \$10,000 to Aramex International exchange in Singapore. This last transaction was recorded in the WTM financial report as external expenses being sent to MATHIYARASAN. I believe this represents a fund transfer to the LTTE.

11.6.5 July 27th, 2005, Mathy \$32,000

359. Banking records for account #06301-8230864 held by CHANDRASEGARAM at the Royal Bank (exhibit 2007-05) indicate that on July 27th, 2005, a \$15,620.56 deposit was made into this account. Prior to this deposit the account balance was \$1,434.65. The deposit made by CHANDRASEGARAM in his account #06301-8230864 included two cheques from the WTM TD bank account #4336-0928569. The Cheques were #1165 and #1166 dated July 26th, 2005, each in the amount of \$7,500, and were made payable to CHANDRASEGARAM. The cheques were drawn from the WTM TD bank account #4336-0928569.

This information was obtained from a transaction records from account #06301-8230864 (97.8); from Royal Bank statement from June 21st, 2005 to July 27th, 2005 (97.2)

This information was also obtained from a WTM TD Banking records (exhibit 2006-12, item 08) account statement (91.11); and cheques # 1165 and 1166. (91.10)

6270618. The beneficiary of the wire transfer was Viva Entertainment of 59A Murray Street, Rahway, New Jersey, USA. The wire transfer was credited to account #2000004675251 held at the Wachovia Bank - Colonia Financial Center located at 526 Inman Avenue, Colonia, New Jersey, USA;

This information was obtained from the bank transaction record dated July 15th, 2005 (103.10); and from TD Bank account history. (103.8)

- On July 25th, 2005, at 1:58pm, CHANDRASEGARAM made a \$5,000 cash deposit into his account #359-6270618 at the TD Bank;

This information was obtained from a bank statement record dated July 25th, (103.11); and from TD Bank account history. (103.8)

- On July 25th, 2005, at 2:18pm, CHANDRASEGARAM ordered a \$10,000 wire transfer. The amount of the transaction including the banking fees was \$10,030 which was debited from account #359-6270618. The beneficiary of the wire transfer was ARAMEX International Exchange as described in a previous paragraph.

This information was obtained from a bank transaction dated July 25th, 2005 (103.12); from a wire payment receipt (37.8); and from TD Bank account history. (103.8)

I believe that the above described transactions demonstrate a link between the Ottawa Branch of the WTM and WTM in Montreal. The Ottawa WTM leader transferred \$5,432.85 into the bank account of a member of the WTM who makes funds transfer to the LTTE International Secretariat. Before making the transfer to the LTTE, CHANDRASEGARAM made himself a \$4,000 cash deposit to cover a wire transfer to Viva Entertainment, a movie distribution company in the USA. The investigation has not linked this transaction to funds transfer for the LTTE but it shows that the money received from the Ottawa WTM, or part of the money received, was not used for that transaction. It was added to a \$5,000 cash deposit made by CHANDRASEGARAM on July 25th, 2005, to make another wire transfer of \$10,000 to Aramex International exchange in Singapore. This last transaction was recorded in the WTM financial report as external expenses being sent to MATHIYARASAN. I believe this represents a fund transfer to the LTTE.

11.6.5 July 27th, 2005, Mathy \$32,000

359. Banking records for account #06301-8230864 held by CHANDRASEGARAM at the Royal Bank (exhibit 2007-05) indicate that on July 27th, 2005, a \$15,620.56 deposit was made into this account. Prior to this deposit the account balance was \$1,434.65. The deposit made by CHANDRASEGARAM in his account #06301-8230864 included two cheques from the WTM TD bank account #4336-0928569. The Cheques were #1165 and #1166 dated July 26th, 2005, each in the amount of \$7,500, and were made payable to CHANDRASEGARAM. The cheques were drawn from the WTM TD bank account #4336-0928569.

This information was obtained from a transaction records from account #06301-8230864 (97.8); from Royal Bank statement from June 21st, 2005 to July 27th, 2005 (97.2)

This information was also obtained from a WTM TD Banking records (exhibit 2006-12, item 08) account statement (91.11); and cheques # 1165 and 1166. (91.10)

360. On August 4th, 2005, CHANDRASEGARAM obtained a \$15,000 bank draft made payable to Sindi Financial Services Inc. The funds used to pay for this bank draft were debited from the account #06301-8230864 held by CHANDRASEGARAM at the Royal Bank. There had been no large transactions made to this account since the deposit of the two cheques from the WTM totalling \$15,000. This \$15,000 bank draft was deposited to the credit of Sindi Financial into an account of a Bank of Montreal branch in Scarborough.
This information was obtained from Royal Bank statement from July 27th, 2005, to September 8th, 2005 (97.7); and from a Royal Bank transaction report dated August 4th, 2005. (97.1)
This demonstrates that the money transferred to Sindi Financial was provided by the WTM.
Sindi financial Services Inc. appears on the website www.tamilcanadian.com, in the business director. It is a money transfer institution located at 2425 Eglinton ave. east, unit 07, in Scarborough, Ontario.
361. This fund transfer of \$32,000 is detailed in two handwritten documents located on pages 17 and 19 of another duo tang binder located in the office of the WTM, exhibit 2006-12, item 01, 27/28. Page 19, dated August 1st, 2005, states that \$32,000 Canadian was given to "Mathy Anna" and that details will be provided later. This note was signed by CHANDRASEGARAM. Page 17, dated August 15th, 2005, states that \$15,000 came from the Quebec Branch, which is the WTM, another amount of \$16,905 came "through Suresh, Ottawa" and a note at the bottom indicating that the person that wrote the note will provide \$95 Canadian later. The total of these three amounts equals \$32,000.
This information was obtained from a handwritten note dated 2005/08/01 (37.13); and from a handwritten note dated 2005/08/15. (37.12)
The \$15,000 from the Quebec branch corresponds to the amount given by the WTM to CHANDRASEGARAM who then transferred it to Sindi Financial.
After speaking with a translator, I believe the expression Anna or Annai to be an expression of respect in Tamil.
362. The \$16,905 listed above is corroborated by a WTM income voucher, dated July 27th, 2005, found on page 12 of exhibit 2006-12, item 01, 27/28. The name on the voucher is SENTHIL. The reason indicated is Suresh Anna (Ottawa). Two signatures appear on the voucher: SENTHIL and S. BALAN (CHANDRASEGARAM).
This information comes from an income voucher dated July 27th, 2005, signed by CHANDRASEGARAM. (37.14)
363. In a letter dated July 27th, 2005, Iniyavan of the Ottawa Branch informs Mr. ADHI, coordinator of the Canada branch, that the amount of \$16,905 Canadian was forwarded through "mummy" from Ottawa Branch. At the bottom it is indicated "Copy to: Mathiyarasan".
This information was obtained from a letter dated July 27th, 2005, page 45, exhibit 2006-12 item 1, 27/28 (37.4)
I believe that the WTM has used CHANDRASEGARAM's personal accounts to make money transfers for several reasons: CHANDRASEGARAM is well respected and trusted having received training in the 2004 Workshop for the Foreign Activists and received his certificate from PRABHAKARAN himself; CHANDRASEGARAM is also the

co-owner of the building at 4160-4162 Van Horne, where the WTM has their office; and the use of a third party makes the tracking of money transfers more difficult and is a way for the WTM not to be involved directly in money transfers destined for the International Secretariat.

11.6.6 August 31st, 2005, Yogamalar \$18,000

364. The last fund transfer in the list mentioned in subsection 11.6 is \$18,000 and has the description of "To Yogamalar as instructed by Mathy".
This information was obtained from the review of a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, item 01, Sector 8, 2nd floor, 14/28 (101.3)
365. On August 21st, 2005, CHANDRASEGARAM, identifying himself as the Deputy Responsible person Quebec Branch, advised Mr. ADHI, coordinator for the Canada Branch, that Mathy "Anna" made a request that he needs \$18,000 from Montreal.
This information was obtained from a WTM handwritten document, exhibit 2006-12, item 01, Sector 8, 2nd floor, 27/28 (37.5)
366. In a letter dated August 31st, 2005, CHANDRASEGARAM indicates that he gave \$18,000 to Mrs. Yogamal SRIRANJAN. The document is signed by both. The letter has the WTM stamp on top.
This information comes from a handwritten letter, page 13 of exhibit 2006-12, item 01, 27/28. (37.15)
I believe that this amount was initially intended for the International Secretariat but at their request, that amount was given to a Montreal resident, SRIRANJAN. It is interesting to note that in the financial reports of the WTM, they include this amount in the \$105,000 of external expenses.

11.7 Fund transfer from the Tamil Rehabilitation Organization ("TRO")

367. Also located among the documents discarded by the WTM in Montreal on April 11th, 2006, were 2 donation receipts from the TRO. Both receipts are identified "donations to the LTTE in Kilinochchi, Sri Lanka" and indicate donations from Canada. Receipt #0287 dated July 8th, 2004, for \$33,000 indicates that the payment was made via the bank. Receipt 0290 dated February 6th, 2004, for \$50,000, indicates that the payment was made via the bank. These 2 receipts represent an \$83,000 amount transferred to the TRO located in the LTTE controlled area of Sri Lanka.
This information was obtained from Cpl. CLOUTIER's report, dated August 24th, 2006 (71.6); and from exhibit 2006-13, item 44. (71.5)

12 THE SUB-ORGANIZATIONS OF THE WTM

368. The LTTE Operations Manual dictates the following guidelines in regards to the creation of auxiliary organizations by the foreign branches. In the LTTE Operations Manual, the auxiliary organizations are divided as follows:

- (1) Students federations;
- (2) Women's federation;
- (3) Creative art club;
- (4) Chencholai, Arivucholai;
- (5) General organizations of Eelam Tamils;
- (6) Educational Institutions;
- (7) Sports Division.

This information was obtained from the LTTE Operations Manual, section 3, seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

369. The LTTE Operations Manual dictates the following guidelines in regards to the responsible personnel of auxiliary organizations:

- > "Must function under the control of the personnel in charge for the branch;
- > Must administrate their organization in order to generate strength for our movements' activities;
- > With regard to bring forth the strength to our freedom battle, coordinate all level of people, through the auxiliary organizations."

This information was obtained from the LTTE Operations Manual seized at 7720 Pie IX Boulevard, Unit 1, Montreal April 13th, 2006. (32)

I believe that these guidelines show how important auxiliary organizations are to the LTTE and their fight against the Sri Lankan government.

370. In a letter dated the 18th of June 2005, the activists of the World Tamil Movement of Quebec advise the In Charge Personnel (V.MANIVANNAN) of the International Secretariat in regards to any change in structure of the WTM. Among the events listed, the letter states the following:

"The associations such as: women's federation, sports division, youth federations, chencholai, and Tamil welfare' association was established."

This information comes from a letter seized at 7720 Pie IX apartment 1, exhibit 2006-20, item 4.12. (45.2)

12.1 Student Federations

371. The goals set by the International Secretariat for the Student federation are set to encourage the sub-organization to:

- > "Provide clear explanations to young Tamils with regards to their liberation battle;
- > In regards to their freedom battle, persuade young Tamils to visit the motherland, and to take direct participation in the current construction activities;
- > Encourage Tamil students to pursue their studies into the necessary fields for the process of developing Tamil Eelam;
- > Explain to foreign University students, through the use of Tamil student, about the idea of their freedom battle;
- > In order to have the better understanding among the Tamil students of foreign residence, conduct athletic and educational competitions."

This information was obtained from the LTTE Operations Manual. (32)

372. The WTM is linked to a Student Federation by the name of the Student Association of the World Tamil Movement ("SAWTM"). The administrator of this organization is MANICKAM. The SAWTM is registered with the Quebec Enterprise Registrar as an association since May 7th, 2004. The goal is to organize athletic and other sport activities. This organization gave its address as 4160 Van Horne Avenue, Montreal, which is the office of the WTM.
This information was obtained from certified copies of the Quebec Enterprise Registrar dated January 17th, 2008. (38.6)
I believe that the Student Association is a sub-organization of the WTM as dictated by the International Secretariat of the LTTE for the structure of their international foreign branches.
373. The WTM organizes annual sports events lasting several days. Those events, also known as the Tamil Olympics, are presented as being organized by the Student Association of the WTM. In fact, these events are organized and controlled by the activists of the WTM. On April 12th, 2006, a document was seized at the WTM at 4162 Van Horne Avenue, Montreal, referred to as exhibit 2006-12, item 01, 9/28. In this document, a financial report in regards to this event shows the summary of the revenues and expenses. It was prepared by MANICKAM, the treasurer of the WTM and administrator of the SAWTM.
This information was obtained from Cpl. BOUDREAU' investigative report dated July 19th, 2006 (46.2) and from the financial sheet "WTM Sports 2004 - Summary" seized at 4162 Van Horne Avenue, Montreal, exhibit 2006-12, item 01, 9/28. (46.3)
374. Also in this document, a financial sheet details the expenses of this event. The names of four WTM activists are listed: MANIVANNAN, MURALI (THURAIRATNAM), Anton MANICKAM and DOUGLAS.
This information was obtained from the financial sheet seized at 4162 Van Horne Avenue, Montreal, exhibit 2006-12, item 01, 9/28. (46.4)
This shows that finances relating to this event organized by SAWTM are controlled by the WTM; WTM's leader in 2004 and paid activist, Manivannan KARUNANANTHASWAMY; Anton MANICKAM, WTM treasurer and the co-signing officer for the WTM TD bank account #4336-0928569 held at the TD Canada Trust Bank in Montreal since 1994; and Muralee Karan THURAIRATNAM, a paid activist, the person responsible for finance and the future Leader of the WTM in 2005.
375. In this same document, pages referring to the 14th annual Athletics Competition organized by the Student Association of World Tamil Movement Montreal on August 1st, 2004, are found. These pages show the location and the logo or name of the different sponsors. Also mentioned on the pamphlet is the Challenge Trophies: the SHANKAR Trophy which is awarded for the memory of the first great Tiger martyr Lt. SHANKAR.
This information was obtained from pages 52 and 53 of a document seized at 4162 Van Horne Avenue, Montreal. (46.5)
376. As stated earlier in sub-section 6.11, a letter addressed to Mr. V. MANIVANNAN with his title being "Responsible Person International Secretariat, LTTE", was seized at the WTM at 4162 Van Horne Avenue, Montreal. The document refers to the 15th annual Athletics Competition held on August 13th, 2005. The letter is from CHANDRASEGARAM.
This information was obtained from the report on the Student Association of

World Tamil Movement's 15th annual athletic meets - 2005, seized at 4162 Van Horne Avenue on April 12th, 2006. Exhibit 2006-12, item 01, 27/28. (37.3)

This letter shows a direct link between V. MANIVANNAN and the LTTE. It is also an example of correspondence between WTM and LTTE.

12.2 Women Federation

377. The LTTE International Secretariat has the Women Federation on their organizational chart for the structure of the LTTE Foreign Branches. The LTTE Operations Manual dictates the following guidelines in respect to women's federation:

- > "Under this banner, gather the Tamil women of foreign residence, and among them, create a community of awareness;
- > When there are joyful ceremonies' take places in Tamil families, persuade those families through this federation, in order to help at any manner to Chencholai, to Kantharuban, and to Arivucholai;
- > This federation must take necessary steps to ensure the participation of women in the structure of the foreign branches;
- > This federation must take necessary steps to have more female participation within the activities in explaining the facts (the rightness) about our battle to foreign nationals."

This information was obtained from section 3.2 of the LTTE Operations Manual. (32)

I believe that the WTM is linked to an auxiliary organization by the name of Tamil Women Association of Quebec ("TWA"). This Women Federation is considered a sub-organization of the WTM.

378. The TWA is registered with the Quebec Enterprise Registrar as an association since July 28th, 2006. The organization gives it address at 4365 Plamondon Avenue, Montreal, which is also the residential address of the association President, Kandiah SIVAMALAR. There are eight administrators listed for the TWA.
This information was obtained from a CIDREQ query obtained on October 24th, 2006. (38.7)

379. A letter dated December 17th, 2004, titled "Report for the month of November 2004" has the header indicating K. MANIVANNAN, the person responsible for the Quebec branch (WTM). It states that Mrs. Sivalamar KANAGARATNAM is the responsible person in charge of the women's organization Quebec branch. More than 25 ladies attended the inaugural meeting and they registered themselves as activists of this organization. It also states that the activity plan will be implemented by them in January 2005. In the LTTE Operations Manual, "The branch-in-charge personnel" section states: "Compose the monthly activity report for the branch and submit before the 10th day of the following month".

This information was obtained from a letter seized at 4162 Van Horne Avenue, Montreal (37.16); and from the LTTE Operations Manual. (32)

This letter is an example of the WTM advising the LTTE as directed in the LTTE Operations Manual.

380. The name K. Sivamalar is written on the list of the 36 WTM activists. This list was

attached to a letter, addressed to the person in charge of the LTTE International Secretariat and dated June 18th, 2005. Her responsibilities amongst the WTM were given as being part of the "Women Federation".

This information was obtained from a review of a letter addressed to the International Secretariat from the WTM. (45.2)

381. The name SIVAMALAR appears as a coordinator on 2 pledge forms used by the WTM to collect funds for the Tamils Savings Plan.
This information was obtained from a review of the Tamils Savings Plan collection forms seized from 7720 Pie IX Boulevard, unit the WTM on April 13th, 2006: form 6962 (108.2); and form 6953. (108.3)
I believe the name of the coordinator indicates the person who approached the donor and canvassed for the pledges.
As seen earlier in 10.2.8, the Tamils Savings Plan is a fundraising method for the LTTE.
382. The Remembrance Day event for 2005 was organized by the Women Association of the WTM. I have reviewed a letter titled "The Remembrance Day-2005 Organised by the Women Federation of World Tamil Movement". The letter is an explanation of the Remembrance Day held in 2005. In this letter, it is indicated that event started with the lighting of oil lamps to remember the martyrs who sacrificed themselves to liberate the nation. Among the martyrs listed is Lieutenant SHANKAR, who is believed to be the first LTTE fighter to die in combat on November 27th, 1982. The letter also indicates that the Tamil Eelam national flag was hoisted. Also, a general tribute was offered for "those martyr gods who sacrificed their lives for the liberation of Tamil Eelam land". Near the end of the letter, it indicates that Mrs. Sivalmatar Kandiah is the responsible person for the female federation of the WTM of Quebec.
The letter ends with the traditional phrase: "The desire of the Tigers is Tamil Eelam Nation".
This information was obtained from a handwritten document seized at 7720 Pie IX, unit 1, Montreal on April 13th, 2008. (107.2)
In the translation of the document a clerical mistake was made in the date of the Remembrance Day event. It should have stated 2005 and not 2006 as the translated document indicates. I have reviewed this letter titled "The Remembrance Day-2005, Organized by the Women Federation of World Tamil Movement". I am satisfied that the letter is an explanation of the Remembrance Day held in 2005.
383. The Remembrance Day event for 2005 was organized by the Women Association of the WTM. I have reviewed two letters prepared by the TWA. One letter is an invitation for the Remembrance Day 2005 celebration and the second letter is a Thank you note to the participants who attended the Remembrance Day 2005. Both letters were sent by the Women Federation of World Tamil Movement of Quebec, giving their address as being 4160 Van Horne Avenue, Montreal.
This information was obtained from handwritten documents seized at 7720 Pie IX, unit 1, Montreal on April 13th, 2008. (107.3)
I believe that the wording "women association" and "women federation" are synonymous and speak of the same, which later became the Tamil Women Association when registering with the Quebec Enterprise Registrar.
384. Following the Special Search Warrant of September 3rd, 2008, Montreal INSET investigators seized a poster advertising an event put together by the Tamil Women

Association of Quebec. The event was to celebrate the women's international day and hindou new year 2008. The poster indicated the event date as 2008-04-12 and a cost of \$5 or \$6 dollars. A phone number is indicated on the poster as 514-731-9186. A check of this phone number with the civil liaison section indicates that the number is registered to: K KANAGARATNAM, 4365 av. Plamondon, Montreal, Qc, H3S1M1.

This information was obtained from a continuation report of Constable Steve DUBREUIL dated November 14th, 2008. (109)

The Tamil Women Association of Quebec fits the objectives and activities stated in the section Auxiliary Organizations of the LTTE Operations Manual. This activity proves that regardless of the listing of the LTTE, sub-organizations of the foreign branches continue with their activities.

12.3 Creative art clubs

385. The LTTE Operations Manual dictates the following guidelines in regards to the creative art and cultural club:
- In order to bring forward our liberation battle, gather the support from the Tamil citizens of foreign residence and create different varieties of propaganda activities by underlying with the simultaneous events;
 - In order to produce the successful propaganda activities, identify the new artists and assemble them together;
 - Take necessary steps that the foreign nationals to have eager to know about the specialty of the Tamil's culture;
 - According to the special days of Tamil Eelam, simultaneously produce the varieties of creative art programme.
- This information was obtained from the LTTE Operations Manual, section 3-3, seized at 7720 Pie IX Boulevard, Unit 1, Montreal, on April 13th, 2006. (32)**
386. The WTM is linked to an organization by the name of Academy of Tamil Arts and Technology ("ATAT"). The addresses associated to the ATAT in 2003 were 4160 Van Horne Avenue, Montreal (WTM office) and 3810 Rachel Street, Montreal, which is located next to THURAIRATNAM's residence.
This information was obtained from a report from Immigration Canada dated March 9th, 2004 (110.3); and from an investigative report by Cst. MANCINI dated March 10th, 2004. (110.2)
387. A rental agreement, dated November 1st, 2003 was found during the search of 7720 Pie-IX Boulevard, Montreal on April 13th, 2006. The agreement was signed by the lessee Manivannan KURANANANTHASWAMY in regards to 3810 Rachel east, Montreal.
This information was obtained from a rental agreement found in exhibit 2006-20, item 2.2. (110.1)
In 2003, KARUNANANTHASWAMY was the Quebec branch WTM leader.
388. A white computer, make ISB, was seized at 4162 Van Horne Avenue, Montreal. In this computer, a list containing associations linked to ATAT was found. Among the associations listed, these three associations of interest were associated to ATAT:

- (1) Eelam Tamil Association (also known as Onriyam and ETAQ);
- (2) Chencholai Van Horne;
- (3) and Thamilar Oli.

These three associations give the names of numerous students as well as their grade, their gender, their marks (grades), their index number and their grading status for the proficiency examinations in Tamil that took place in 2005. Several other associations of the ATAT provide the same information as the three mentioned above.

This information was obtained from a review of a document titled "Academy of Tamil Arts & Technology" seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006, exhibit 2006-12, item 11. (111.2).

389. On the computer, investigators also located a document entitled "time table.doc" in which the ATAT indicates the times when the MATH EXAM 2005 will be conducted. The address indicated is 4160 Van Horne Avenue. The date is June 12th, 2005. At the bottom, one of the contact numbers shown is 514-735-9984 which is the phone number of the WTM.
I have obtained this information from a document found in exhibit 2006-12, item 11, seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006. (111.3)
390. On April 11th, 2006, during police surveillance, the WTM leader, THURAIRATNAM, was observed with other Tamil males transporting several boxes to a municipal recycling bin of the Eco-centre in Montreal from 4160 and 4162 Van Horne Avenue. A subsequent search of the recycling bin revealed several boxes of documents related to the WTM. The documents were retrieved by investigators and found to contain enrolment forms of the ATAT, dated 2004.
This information was obtained from a review of a document seized at the Eco-centre, exhibit 2006-13 item 22 (71.7); and Cpl. CLOUTIER's report dated April 11th, 2006. (47.1)
391. On April 13th, 2006, a black and yellow backpack was seized at 7720 Pie-IX Boulevard, apt. 1, Montreal. Inside the backpack, investigators found a large envelope containing smaller envelopes and papers. One of these papers was an ATAT enrolment form with \$4.50 in small change. The ATAT enrolment form has a space at the bottom left entitled "Signature: Officer collecting/Processing" with a signature above it.
This information comes from an ATAT enrolment form, exhibit 2006-20, item 01, #1.17i. (110.4)
*It is interesting to note that two enrolment forms for ATAT were located at two different addresses, in Montreal: 4162 Van Horne and 7720 Pie-ix apt.1, Montreal.
Also, I believe that the signature at the bottom of one of the forms is that of Kathiravelupillai SITHAMPARANATHAN, the president of the WTM.*
392. On April 12th, 2006, a red binder was seized at 4162 Van Horne Avenue, Montreal. In the binder, investigators found a document titled "Tamil language competition – 2004". In a table format, the revenues and expenses related to this event are presented. Among the details, the three above organizations are indicated with a number and an amount:

(1)	Eelam Tamil Association	74	\$592
(2)	Van Horne	54	\$432

(3) and Thamil Oli 86 \$698

The total revenue indicated is \$4,016 and the total expenses indicated are \$899.44 for a total profit of \$3,116.56.

This information was obtained from a document titled "Tamil language competition – 2004", exhibit 2006-12, item 01, 8/28. (112.2)

I believe that the number indicated next to each name is in reference to the number of students that took part in the competition. I also believe that the amount shown is equal to a fee of \$8 per student. I believe that the name Van Horne is in fact the same as Chencholai Van Horne which investigators found on lists of students on a computer found at 4162 Van Horne.

393. In the same binder as the previous paragraph, seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006, investigators found a WTM income voucher. The name on the voucher is Manivannan. The reason indicated states "the profit received through the Tamil language contest". The amount is \$3,116.56, the same as indicated in the previous paragraph. The date is August 12th, 2004. The voucher is signed by both Manivannan and T. MURALI.
This information comes from an income voucher, page 2 of exhibit 2006-12, item 01, 8/28. (112.4)
I believe Manivannan to be Manivannan KARUNANANTHASWAMY and T. MURALI to be Muralee Karan THURAIRATNAM.
394. On April 12th, 2006, a yellow binder was seized at 4162 Van Horne Avenue, Montreal. In this 41 page binder, investigators found a document titled "Revenue and expenses statement for the month of August 2004". The report came from S. MURALI, person responsible Finance Division Quebec. This document details the monthly expenses and revenues of the WTM. In the revenue column, on line 04, it is indicated an amount of \$4,766.56 obtained through sub organizations. Documents relating to this amount are located on page 9 and 10 of this binder. On page 9, a copy of the same income voucher as mentioned in the previous paragraph was found, for an amount of \$3,116.56 received through the Tamil language contest. On page 10, is a WTM income voucher in the name of the Eelam Tamil Association and the reason given is school revenues. Both vouchers were signed by THURAIRATNAM.
This information comes from a WTM monthly financial report (113.2); and from two income vouchers, exhibit 2006-12, item 01, 7/28. (113.3)
The above paragraphs prove that the activities of the Academy of Tamil Arts and Technology were conducted on behalf of the WTM and that revenues coming from ATAT activities were to the benefit of the WTM.
395. On September 3rd, 2008, investigators executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. In a room at 4162 Van Horne Avenue, investigators seized a grade 8 school book of the Academy of Tamil Arts & Technology. At the back of the book, a large photograph of the LTTE leader PRABAKHARAN appears. Below the photograph it is written "The best artist will gather the truthful outcome of the living condition, as the source for his creation. Mr. V. PIRABAKARAN National leader of Tamil Eelam."
This information was obtained from a school book, exhibit 2008-11, item G234. (photo 41)
I believe that this book shows that the WTM, through its sub-organization known as

ATAT, follows what the LTTE Operations Manual dictates as a goal of the activities for foreign branches which is to "Encourage the younger generation of foreign residence of Tamil diaspora to have compassion for Tamil language and persuade their feelings toward Tamil nations. Establish the contacts with the motherland and be strong in it." I believe that the WTM through ATAT uses academics to influence young children by teaching them LTTE propaganda in order for them to support the LTTE. Because the ATAT uses the address of 4160 Van Horne on their publicity fliers, and that they provide the phone number of the WTM as a contact number on these same fliers and because the book was located in what appears to be a class room at 4162 Van Horne, I believe that the building housing 4160 and 4162 Van Horne is used for the benefit of the LTTE.

12.4 Chencholai, Arivucholai

396. The LTTE Operations Manual dictates the following in respect to Chencholai, Arivucholai:

- "During their birth days celebrations of those young Tamil children of foreign residence, encourage them to share their happiness by forwarding the gifts of souvenirs and friendly letters to these organizations;
- Forward different varieties of text books, video and audio cassettes, according to the educational standard of those students who are studying in these organizations;
- Provide explanations to the foreign residence of Tamils and to the foreign citizens, about the needs and the goals of these organizations;
- For the purpose of receiving assistants to these organizations, approach different structures of foreign administrations."

This information was obtained from sub-section 3.4 of the LTTE Operations Manual. (32)

397. Chencholai or Sencholai is an institution created in 1991 by the LTTE as an orphanage. The organization was first established in Jaffna, Sri Lanka, and later on at other locations in the LTTE controlled areas of Sri Lanka. According to the Sri Lankan Ministry of Defence, the Chencholai camps of the LTTE are used to create a positive image of the organization. The LTTE uses the Chencholai orphanage image extensively in their fundraisings with the Tamil diaspora. According to the Sri Lankan Government, the LTTE Chencholai camps are set up and run like military camps where children are receiving military training. I will demonstrate in the following paragraphs that the WTM supports financially the orphanages funded by the LTTE.

This information was obtained from Ms. BERNARD as referred to in her report dated November 8th, 2006. (114.1); and from an article found by Mrs. BERNARD on the website www.defence.lk on November 7th, 2006. (114.2)

The above mentioned information described the Chencholai children camp in Sri Lanka only, but not those in Canada where they are also called Chencholai Tamil kids club.

398. In a 30 page article published by WTM on the www.tamilnation.org website titled "Velupillai Pirabakaran: A Profile", a section on page 26 talks about Chencholai kids club. It states:

"On instructions from leader Pirabakaran, the Chencholai Kids club was

inaugurated on October 23rd, 1991, to take care of girls who had lost their parents and/or guardians. On this occasion, he sent a message which read, "Under the environment of a historic war of liberation we are planting these young seeds at Chencholai campus. It is my desire that these young seeds must take deep roots and grow up one day as an intellectual reservoir of Tamil Eelam. I convey my greetings for this revolutionary venture to thrive well and prosper."

This information was obtained from an article on the website www.tamilnation.org. (10.3)

399. As mentioned in sub-section 12.3, a document in Tamil titled "Tamil language competition - 2004" was reviewed. The document in table format consists of 5 columns with the first column being the detail of the Schools. The first entry in the first row is Chencholai. The descriptions of all the other schools or associations are listed under in the same column. The document is a report on the number of participants and expenses/revenues from the competition. The total profit from that competition was \$3,116.56.

This information was obtained from a document titled "Tamil language competition - 2004", seized at 4162 Van Horne, Montreal on April 12th, 2006, exhibit 2006-12, item 01, 8/28. (112.1)

I believe that the use of the word Chencholai by the WTM in respect to different Tamil schools in the Montreal area is an indication of the WTM's support for the LTTE controlled Chencholai in Sri Lanka.

400. A black binder was seized during the search at 4162 Van Horne Avenue, Montreal, on April 12th, 2006. The binder was titled November 2005. A review of the monthly financial report for the month of November 2005 shows that on line 10, the WTM reported an expense for rent in the amount of \$1,950. This expense is broken down in two: \$1,000 for office and \$950 for the school branch. A WTM voucher found on page 23 showed the reason for the expense to be Arivucholai rent dated November 10th, 2005. The name of the person responsible is T.MURALI.

This information was obtained from exhibit 2006-12, item 01, 13/28: the November 2005 financial report, (102.4); and from an expense voucher. (102.5)

I believe that this shows that the WTM controls the finances of the Montreal area Chencholai which are considered sub-organizations as per the instructions in the LTTE manual. As seen earlier in this Affidavit, the monthly financial reports are forwarded to the International Secretariat as dictated in the LTTE Operations Manual. I believe that Chencholai is orphanages for girls and Arivucholai is for boys.

401. Another black binder was seized during the search at 4162 Van Horne Avenue, Montreal, on April 12th, 2006, containing 32 pages. A 6 months financial report from May to October 2005 was located on pages 1 to 3. In this report, revenues and expenses are explained. In the revenue section, there is an amount of \$26,261.95 indicated as other income. Part of this other income is explained by the following notation:

"Chencholai (Tamil kid club)" \$380

This information was obtained from a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, item 01, 14/28 (101.3)

It is interesting to note that the use of the expression Chencholai Tamil kid club in the WTM report corresponds to a similar title provided on page 26 of an article published by

WTM on the www.tamilnation.org website titled "Velupillai Pirabakaran: A Profile" which refers to "Chenchoalai kids club". (10.3)

12.5 General associations of Eelam Tamil

402. The LTTE Operations Manual dictates the following in respect to General associations of Eelam Tamils:

- Based on the fundamental principal for the welfare of Tamil's nation, incorporate of those different Tamil associations, sports clubs, religious communities (religious orders) etc., under one general organization;
- Persuade these organizations to raise their voice in supporting for our freedom battle and encourage them to take part by contributing through other different areas.

This information was obtained from sub-section 3.5 of the LTTE Operations Manual. (32)

403. The WTM is linked to the Eelam Tamil Association of Quebec ("ETAQ"). The ETAQ is registered with the Quebec Enterprise Registrar as an association since November 12th, 2001. In its annual reports, the ETAQ gives its address as 4162 Van Horne Avenue, Montreal. Moreover, SIVARAMAN, the co-owner of 4160 and 4162 Van Horne Avenue, is listed as one of the administrators for the ETAQ.

This information was obtained from a certified copy of ETAQ's annual declaration from 2002 to present. (38.16)

404. ETAQ is responsible for administrating Tamil schools also known as "Onriyam". The WTM sometimes also refers to these schools in their reports as the Eelam Tamil Association School Fund. Revenues of \$592 from "Onriyam School" or "Eelam Tamil Association School Fund" were entered in the WTM monthly financial report as part of its revenues from a sub-organization.

This information was obtained from the document titled "Tamil language competition - 2004", exhibit 2006-12, item 01, 8/28 (112.2); and from the November 2005 financial report exhibit 2006-12, item 01, 13/28. (102.4)

405. On April 12th, 2006, a yellow binder was seized at 4162 Van Horne Avenue, Montreal. In this 41 page binder, investigators found a document titled "Revenue and expenses statement for the month of August 2004". The report came from S. MURALI, person responsible Finance Division Quebec. This document details the monthly expenses and revenues of the WTM. In the revenue column, on line 04, it is indicated an amount of \$4,766.56 obtained through sub organizations. Documents relating to this amount are located on page 9 and 10 of this binder. On page 9, a copy of an income voucher previously mentioned was found, for an amount of \$3,116.56 received through the Tamil language contest. On page 10 is a WTM income voucher in the name of the Eelam Tamil Association and the reason given is school revenues in the amount of \$1,650. Both vouchers were signed by THURAIRATNAM.

This information comes from a WTM monthly financial report (113.2); and from two income vouchers, exhibit 2006-12, item 01, 7/28. (113.3)

The above paragraphs prove that the activities of the Eelam Tamil Association were

conducted on behalf of the WTM and that revenues coming from ETAQ activities were to the benefit of the WTM.

406. In a black binder seized during search at 4162 Van Horne Avenue, Montreal, on April 12th, 2006, a 6 months financial report from May to October 2005 was located on pages 1 to 3. In this report, revenues and expenses are explained. In the revenue section, there is an amount of \$26,261.95 indicated as other income. Part of this other income was entered in the WTM monthly financial report as revenue from a sub-organization and is explained by the following notation:

"Onriyam (Tamil school)" \$950

This information was obtained from a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, item 01, 14/28 (101.3)

407. In a green binder seized during search at 4162 Van Horne Avenue, Montreal, on April 12th, 2006, an income voucher was found on page 18. The reason indicated on the voucher is Cash income of Eelam Tamil Association 2004. The date of the income voucher is June 25th, 2005. The voucher was signed by THURAIRATNAM.

This information was obtained from a WTM Income voucher, dated June 25th, 2005. (115.2)

I believe that this shows that the WTM controls the finances of the Montreal area ETAQ and Tamil schools (Onriyam) which are considered sub-organizations of the WTM. As per the instructions in the LTTE Operations Manual, the revenues generated by these sub-organizations are accounted for in the monthly financial reports. As seen earlier in this Affidavit, the monthly financial reports are forwarded to the International Secretariat as dictated in the LTTE Operations Manual.

12.6 Educational centres

408. The LTTE Operations Manual dictates the following guidelines in regards to educational centres:

- "In those regions where the Tamils reside relatively thick, according to the Tamil students, establish the Tamil educational centres;
- Establish at all of these educational centres, that the methods of teaching of the subjects must follow the same formula of syllabuses;
- All of these educational centres must include the following subjects in their method of teaching such as: Tamil language, Tamils' history and fine arts;
- The teachers must be selected from those specific regions, and in order to teach, the necessary training should be provided;
- For the purpose of those students who are studying at the said educational centres and for other Tamil students, where Tamils are resides relatively thick, establish martyrs' educational centres;
- During the Tamil national days, conduct the cultural art programs of the students from those educational centres."

This information was obtained from the LTTE Operations Manual, section 3-6. (32)

409. In the Montreal area, an example of an educational centre is the NAVAM educational centre. In a blue binder titled November 2004, seized during search at 4162 Van Horne

Avenue, Montreal, on April 12th, 2006, a monthly financial report for November 2004 was found. In this report, revenues and expenses are explained. In the revenue section, line three refers to "funds received through activists". An amount of \$5,190 is broken down in two entries:

➤	Through the Navam education centre plan	\$2,500
➤	Through the activists	\$2,690

In the same binder, on page 22, a November 13th, 2004, income voucher in the amount of \$2,500 was located. The name on the voucher is CHANDRABALAN. The reason indicated is "Navam education centre (through drama festival)". Two signatures appear on the voucher: S. BALAN and T MURALI.

This information comes from a WTM monthly financial report (118.2); and from an income voucher, exhibit 2006-12, item 01, 4/28. (118.3)

I believe CHANDRABALAN and S. BALAN to be CHANDRASEGARAM and that T. MURALI is THURAIRATNAM.

I believe that NAVAM is the name of an LTTE martyr. In two articles located on Sri Lankan websites, www.lankapapers.com and www.dailynews.lk, Col. NAVAM is described as an LTTE martyr and hero. (117.1) (117.2)

I believe that this example shows how activities and revenues of the sub-organizations, in this case educational centres, are controlled by the WTM, and ultimately the LTTE. The WTM indicates in their monthly financial reports, which are destined for the International Secretariat, the revenues related to, in this case, a martyrs educational centre.

12.7 Sports Division

410. The WTM is linked to an organization by the name of The Eelam Tamil Soccer Association ("TESA"). The TESA was registered with the Quebec Enterprise Registrar since June 18th, 2001. The association gave its address as being 4160 Van Horne Avenue, Montreal. One of the administrators was Sangarapillai RAVINDRARAJAH. This sub-organization no longer exists since May 7th, 2004.
This information was obtained from an Internet search on Quebec Enterprise Registrar dated February 25th, 2009. (38.14)
411. A letter addressed to V. MANIVANNAN, the representative for the International Secretariat, was located at 4162 Van Horne Avenue, Montreal, during the execution of the Search Warrant on April 12th, 2006. This letter was from CHANDRASEGARAM. The letter describes the 15th annual athletic meet in August 2005. In the second paragraph of the letter, there is the honourable mention of the guest, the mayor of the NDG Borough, Mayor APPLEBAUM. The letter states that Mayor APPLEBAUM, amongst other things, distributed awards to the winners.
This information comes from a letter seized in a box at 4162 Van Horne, Montreal. Police exhibit 2006-12 item 1, 27/28. (37.3)
This letter also makes reference to SITHAMPARATHAN and describes him as "Iyyah", the leader of the WTM.
412. In a black binder seized during search at 4162 Van Horne Avenue, Montreal, on April

12th, 2006, a 6 months financial report from May to October 2005 was located on pages 1 to 3. In this report, revenues and expenses are explained. In the revenue section, there is an amount of \$26,261.95 indicated as other income. Part of this other income was entered in the WTM monthly financial report as revenue from a sub-organization and is explained by the following notation:

"Sports" \$1,810

This information was obtained from a 6 months financial report from May to October 2005, pages 1 to 3 of exhibit 2006-12, item 01, 14/28. (101.3)

413. In another black binder seized at 4162 Van Horne Avenue, Montreal, on April 12th, 2006, titled August 2005, investigators found on page 1 an income voucher dated August 27th, 2005 in the amount of \$1,810. The name indicated on the voucher is "Montreal staff". The reason is Sports Division. The voucher is signed by CHANDRASEGARAM. **This information was obtained from an income voucher found in exhibit 2006-12, item 01, 16/28. (116.2)**

I believe that this example shows how activities and revenues of the sub-organizations, in this case Sports Division, are controlled by the WTM, and ultimately the LTTE. The WTM indicates in their monthly financial reports, which are destined for the International Secretariat, the revenues and expenses related to the Sports Division.

13 CORRESPONDANCE BETWEEN WTM AND LTTE

414. *Throughout this investigation, as a result of the Search Warrants executed in 2006 and 2008, investigators have seized many documents in which the WTM advises the International Secretariat of the activities and fundraising initiatives undertaken by the WTM and its sub-organizations. Many monthly activity reports and monthly financial reports have been seized which supports the evidence that the WTM follows the instructions set out by the LTTE Operations Manual. Other letters have also been seized which I will describe in the following subsections.*

13.1 Letter of the 36 activists

415. On April 13th, 2006, investigators seized a letter dated June 18th, 2005, and addressed to V. MANIVANNAN, the in-charge personnel, International Secretariat, Tamil Eelam. The letter is from "The activists of the WTM of Quebec Canada". The letter recommends the International Secretariat to keep the ex-leader of the WTM, KARUNANTHASWAMY, in Montreal. The activists of the World Tamil Movement of Quebec also ask the In Charge Personnel (V.MANIVANNAN) of the International Secretariat for clarification in regards to any change in structure of the WTM. The letter states the following:

To dearest Manivannan "Anna,"

We humbly request to you that, for the last four and a half (4 Yr) years, Mr. Manivannan has been functioning as the person in charge for Montreal branch. Therefore, do not transfer him from Quebec branch to any other branches for any reasons. We would like to emphasize some important events, which were took place during his administration hear(in Quebec):

- 1- For the first time in North America, here (in Quebec) during the year 2003, the "PonkuThamil" event was celebrated in a greater scale. More than 9000 participants took part in that event.
- 2- During this period, large number of people's financial and physical contributions started to follow for Tamil Eelam liberation.
- 3- The number of activists increased from 26 to 38.
- 4- The associations such as: women's federation, sports division, youth federations, chencholai, and Tamil welfare' association was established.
- 5- In an amicable manner, our connectedness became stronger with other organizations in Quebec.
- 6- The relationships with general public were maintained to favour our movement.
- 7- The distribution of the World Tamil (Ulaka thamil) newspapers was increased from 900 to 1200.
- 8- The financial contributions through banks were increased.

Therefore, we humbly request you to consider the above actual facts, kindly analyse the responsibilities of Mr. Manivannan in a better manner and provide us with a favourable answer. If your decision could be in some other way, kindly inform and clarify us of the reason for the changes of responsibilities. Because when we all are engaged in fund raising activities, it is our responsibility to provide explanation to our people.

The illness of his parents is the reason why Mr. Manivannan withdrew himself from the responsibilities of our branch. He is not in a situation to continue the activities out sides of Quebec. We expect that you may perceive about this.

Thanking you.

Desire of Tigers is Tamil Eelam motherland.

This information comes from the translation of the letter seized at 7720 Pie IX apartment 1, exhibit 2006-20, item 4.12. (45.2)

I believe that this letter to the International Secretariat demonstrates how the WTM is making efforts to follow the instructions as indicated in the LTTE Operations Manual.

416. The letter is also accompanied by a list of 36 activists of the World Tamil Movement Quebec branch with their phone numbers:

Name	Responsibilities	Telephone
S. Ramesh	M5 Area Responsible	(514)993-4269
K.Sithamparanathan		(514)247-1582
M.Thevarajah		(514)685-7676
K.Suthan		(514)989-2872
T. S. Kumar		(514)551-9870
K.Neasaratnam		(514)551-9088
S.Sivatharan		(514)296-6874
R.Sejeevan		(514)826-9958
K.Puratthasan		(514)277-5346
S.Sivakumar		(514)271-9854
V.Pushpakaran		(514)744-3146
S.Sivakumar		(514)683-9862
P.Ramani		(514)766-8019
L.Thirumal		(514)735-4679
Rajanisan		(514)996-6748
N.Yoges		(514)257-0926
T.Charles		(514)889-5632
T.Murail		(514)254-8518
N.Jeyaranjan		(514)956-7799
K.Nirmala		(514)333-7782
P.Kajen		(514)333-7782
V.Parameswaran		(514)747-8909
T.Lankaratnam		(514)748-2984
A.Douglas		(514)744-1036
S.Raveendrarajah		(514)948-4514
K.Thevan		(514)273-9341
T.Balan		(514)942-9315
Anton Manikkam		(514)956-0874
K.Jegasothilingam		(514)278-9577
P.Baskaran		(514)271-7226
P.Suthakar		(514)739-4439
K.Sivamalar		(514)731-9186
S.Gnanam		(514)731-0006
S.Ganesh		(514)738-0363
P.Eason		(514)969-1375
K.Ravichelvan		Area Activists

This information comes from the letter seized at 7720 Pie IX apartment 1, exhibit 2006-20, item 4.12. (45.2)

13.2 Travel documents

417. As seen earlier in sub-paragraph 10.2.3.3, the WTM sends letters to the International Secretariat in regards to individuals of the Montreal Tamil community. These letters indicate that these individuals will be visiting Tamil Eelam and that contribute monthly. **This information was obtained from a document seized on April 12th, 2006, from the WTM office located at 4162 Van Horne Avenue, Montreal. (37.17) (37.18) (37.19)**
418. On September 3rd, 2008, members of INSET executed a Search Warrant at 4160 and 4162 Van Horne Avenue, Montreal. In the main reception area of 4160 Van Horne Avenue, investigators seized several binders which were identified as exhibit 2008-11, K284. In a blue binder titled "Office administrative forms", investigators found three

letters called Tamil Eelam travel form. A copy of one of the three forms is shown below.

Tamil Eelam Travel form	
Full name:	Thurairatnam Muralitharan
Residential address:	██
Telephone: ██████████	Fax: ---
Pager: ----	E-mail: ██
Expecting period for travel:	16 - 11 - 2002 - 24 - 01 - 2003
The division of serving:	World Tamil Movement of Montreal, Responsible for finance
Which fighters\ Volunteers wishes to meet in Tamil Eelam:	-----
Which establishments wishes to visit in Tamil Eelam:	-----
In which establishments wishes to serve in Tamil Eelam:	-----
The address in Tamil (if available):	
For office use only	
Confirmation:	With regard to the nations' liberation activities, the above named have been serving for the past ten (10) years, at the World Tamil Movement of Montreal.
(Signature in Tamil) Ka. Manivannan In - Charge	08 - 11 - 2002 Date

This information was obtained from a document seized on September 3rd, 2008, from the WTM office located at 4160 Van Horne Avenue, Montreal, exhibit 2008-11,

Item K284. (132) (photo 44)

I believe that this travel form demonstrates a link between the WTM and the LTTE as the WTM informs that THURAIRATNAM, who is responsible for finances at WTM, is going to be traveling to Tamil Eelam, the LTTE controlled area. It also indicates that he has been working for the past 10 years for the nation's liberation activities. I believe that the expression "nation's liberation activities" is in reference to the fight by the LTTE against the Sri Lankan government.

419. Another travel form is in the name of Kanthavanam RAVICHELVAN of 4191 rue Jean Rivard, unit #5. Here are some of the answers indicated on the form:

- The division of serving: M - 7, Distribution of newspapers, Collection of fund
- Which fighters\ Volunteers wishes to meet in Tamil Eelam: Aavratnam (Ooran) Fighter (Aalan)
- Which establishments wishes to visit in Tamil Eelam: The bank of Tamil Eelam, Chencholai
- Confirmation: For the past six (06) months he has been joined with us and ardently involved with regard to the liberation activities of motherland. An ardent supporter.

The form is signed by MANIVANNAN, in charge Quebec branch, and dated November 8th, 2004.

This information was obtained from a document seized on September 3rd, 2008, from the WTM office located at 4160 Van Horne Avenue, Montreal, exhibit 2008-11, item K284. (132) (photo 44)

420. The last travel form is in the name of Sinniah Gnanasekaran of 6707 Demonts, Montreal. Here are some of the answers indicated on the form:

- Expecting period for travel: Month of March
- The division of serving: The arts and cultural club
- Which establishments wishes to serve in Tamil Eelam: 443 - Navalar Street, Jaffna
- Confirmation: With regard to the Tamil Eelam liberation activities, the above named has been serving approximately, for the past twenty (20) years, at the World Tamil Movement of Montreal.

This form is signed by Manivannan, in charge, and dated February 28th, 2003.

This information was obtained from a document seized on September 3rd, 2008, from the WTM office located at 4160 Van Horne Avenue, Montreal, exhibit 2008-11, item K284. (132) (photo 44)

14 USE OF WTM BUILDING – 4160 AND 4162 VAN HORNE, MONTREAL

14.1 Description of 4160 and 4162 Van Horne

421. The legal description of 4160 and 4162 Van Horne Avenue, Montreal is:

"An emplacement known and described as being lot number **TWO**

MILLION SIX HUNDRED FORTY_NINE THOUSAND SEVEN AND SIXTY EIGHT (2 649 768) of the Cadastre of Quebec, land registration division of Montreal.

With all the buildings thereon erected and more specifically that bearing civic numbers 4160 and 4162 Van Horne Avenue, Montreal, Province of Quebec, H3S 1S1.

As the whole now subsists with all servitudes active and passive, apparent or occult attached thereto, and namely subject to a servitude of passage published under number 488 135 and subject to a servitude of view published under number 2 873 585."

This information was obtained from a memorandum by notary from Justice Canada, Me Nadia BROSSEAU ("Me BROSSEAU"), dated March 24th, 2009. (119.1)

422. On August 2nd, 1999, SIVARAMAN and CHANDRASEGARAM purchased the property bearing civic numbers 4160 and 4162 of said Van Horne Avenue, in the City of Montreal, Province of Quebec. The property was purchased for \$149,000.
This information was obtained from the Sale contract, dated August 3rd, 1999 (119.3); and from "L'index des Immeubles" obtained on www.registrefoncier.gouv.qc.ca website, on March 20th, 2009. (119.2)
423. As of February 26th, 2009, the registered owners of 4160 and 4162 Van Horne Avenue, Montreal, are SIVARAMAN and CHANDRASEGARAM.
This information was obtained from "L'index des Immeubles" obtained on www.registrefoncier.gouv.qc.ca website, on March 20th, 2009 (119.2); and from a memorandum by Me BROSSEAU, dated March 24th, 2009. (119.1)
424. The property at 4160 and 4162 Van Horne Avenue, Montreal, is worth \$365,000 according to a property assessment dated April 11th, 2008, with a mortgage balance of \$79,361.36 as of March 2nd, 2009.
This information was obtained from an e-mail from Jean CADRIN, case officer for the Seized Property Management Directorate, dated March 23rd, 2009. (119.5)
425. The offices of the WTM are located at 4160 and 4162 Van Horne Avenue, Montreal, since 1999. CHANDRASEGARAM and SIVARAMAN are co-owners of the property. Several Tamil community organizations linked to the WTM are listed and have their address at either 4160 Van Horne Avenue, Montreal, or at 4162 Van Horne Avenue, Montreal. The Eelam Tamil Association of Quebec ("ETAQ") for example, gives its address as 4162 Van Horne Avenue, Montreal. The other sub-organization linked to the WTM is The Student Association of the World Tamil Movement ("SAWTM") at 4160 Van Horne Avenue, Montreal.
This information was obtained from Mr. RONDEAU's investigation report (119.6), dated February 20th; from certified copies of the Quebec Enterprise Registrar related to ETAQ (38.16); and from the Internet website of the Quebec Enterprise Registrar for SAWTM. (38.10)
426. Moreover, based on a letter from the Municipal Commission of Quebec, dated January 30th, 2003, the WTM were exempt, as a non-profit organization, from paying the Business Tax until December 1st, 2001. The letter requested that this exemption be renewed based on the fact that the WTM was the lessee, and sole occupant, of the building located at 4160 and 4162 Van Horne Avenue, Montreal, since July 1st, 2002.

The letter was addressed to Sithamparanathan Katheravalupella, *President of WTM*.
This information was obtained from a letter dated January 30th, 2003, from the Municipal Commission of Quebec. (119.9)
I believe Sithamparanathan Katheravalupella to be Kathiravelupillai SITHAMPARANATHAN.

427. In its request for being exempt of paying the business tax, the WTM describes the building at 4160 and 4162 Van Horne Avenue, Montreal, as such, to the Municipal Commission of Quebec:

4160 Van Horne Avenue, Montreal

The basement is comprised of a classroom, a garage, three storage rooms and a bathroom. On the ground floor, there is an office, a waiting room, a bathroom and a computer class.

4162 Van Horne Avenue, Montreal

Four classrooms, a kitchen room and a bathroom.

This information was obtained from a letter dated January 30th, 2003, from the Municipal Commission of Quebec. (119.9)

428. At the time of the execution of the Search Warrants at 4160 and 4162 Van Horne Avenue, Montreal, in 2006, the inside of the building can be described as such:

These two civic addresses (4160 and 4162 Van Horne Avenue, Montreal) represent the first and second floors of a duplex originally set up for two residences. Each address has its own entrance and access to the outside through a common outside door. The premises located at 4160 Van Horne Avenue have been arranged with a large reception area with a counter and business-like setup including a computer and filing cabinets. Also found in this area is a lounging area with couches, a television set and three flags displayed on floor stands. Those are the Canadian flag, the Quebec flag and the LTTE flag. In this reception area were also several large display cabinets containing multiple LTTE propaganda items for sale. Those items were seized by the police on April 12th, 2006. On the second floor of the building at 4162 Van Horne Avenue, a room was used as the administration office of the WTM. The other rooms were messy and one of them was used as a computer room. Neither at 4160 Van Horne Avenue nor at 4162 Van Horne Avenue can be seen rooms used as bedrooms.

This information was obtained from my review of photographs taken by Cpl. LEBLANC. (photo 43)

After reviewing the pictures taken of both these addresses, it is obvious that the premises are not used as a family dwelling-house, but rather as a business property.

14.2 Mortgage and Bank account at the Bank of Nova Scotia

429. On July 27th, 1999, SIVARAMAN and CHANDRASEGARAM obtained a mortgage in the amount of \$109,000 from the Bank of Nova Scotia to cover part of the purchasing price for the property of the 4160 and 4162 Van Horne Avenue, Montreal. The purchase price for the property was \$149,000.
This information was obtained from a copy of the DEED OF HYPOTHEC registered at the registration division of the city of Montreal on July 27th, 1999 (120.1); and from the application for credit form of the Bank of Nova Scotia dated May 31st, 1999. (120.2)
430. In order to obtain the requested \$109,000 mortgage on the building located at 4160 and 4162 Van Horne Avenue, Montreal, SIVARAMAN and CHANDRASEGARAM were required by the bank to put a \$40,000 down payment. This \$40,000 was given by T. JEGATHEESWARAN of 4430 Van Horne Avenue, Montreal, telephone #514-345-9117. The \$40,000 was declared by T. JEGATHEESWARAN as being a gift given to CHANDRASEGARAM, a cousin. This declaration of gift was signed by T. JEGATHEESWARAN on May 31st, 1999, and by CHANDRASEGARAM on June 6th, 1999.
This information was obtained from the Declaration of gift presented form included in the mortgage application file at the Bank of Nova Scotia for the 4160 and 4162 Van Horne Avenue, Montreal. (120.3)
431. The mortgage agreement with the Bank of Nova Scotia stipulated that the monthly payment would be \$694.15 payable on the first day of each month starting on September 1st, 1999. Further that an amount of \$390 was payable each month for deposit to the mortgage tax account. This additional payment is placed in the tax account to cover the municipal property tax. This first mortgage was for a 5 years period ending August 1st, 2004. Further, the building is a residential dwelling. The Bank of Nova Scotia mortgage transactions history report, covering the period between December 31st, 1999, to November 1st, 2005, for the building located at 4160 and 4162 Van Horne Avenue, Montreal, indicates the amounts for the bi-weekly mortgage payments (principal and interest) as well as payments to the property tax account. All payments are debited from bank account #802910116289 held at the Scotia Bank located at 4861 Van Horne Avenue, Montreal.
This information was obtained from the Statement of disclosure for mortgage number 583636-6 from the Bank of Nova Scotia dated June 16th, 1999 (120.4); and from a certified copy of the mortgage transaction history received from the Bank of Nova Scotia Security. (120.5)
432. The account holder's names for the joint bank account #802910116289 held at the Bank of Nova Scotia, are SIVARAMAN and CHANDRASEGARAM.
This information was obtained from a letter of the Bank of Nova Scotia, dated December 19th, 2007. (120.6)
433. The banking records of the WTM indicate that cheques have been issued to SIVARAMAN to pay for rent and the municipal taxes linked to the building located at 4160 and 4162 Van Horne Avenue, Montreal. The cheques issued by the WTM to SIVARAMAN were accounted for as Rent and City Taxes. A review of the cheques written for this purpose by the WTM from March 2003 to February 2007 gave the following amounts paid by the WTM:

- 2003 - \$9,600;
- 2004 - \$18,000;
- 2005 - \$15,200;
- 2006 - \$17,600;
- 2007 - \$4,000 as of February.

This information was obtained from Mr. RONDEAU as referred to in his investigation report dated November 27th, 2007. (120.7)

I reviewed Mr. RONDEAU's report. On page 3 of his report, I noticed that the third entry for 2006 should indicate cheque #1204 for \$1,300 instead of cheque #1193, which seems to be a repeat of the first entry for 2006.

434. The banking records of the WTM indicate that cheque #1336 has been issued to SIVARAMAN for February 26th, 2008, to pay for rent and municipal taxes linked to the building located at 4160 and 4162 Van Horne Avenue, Montreal. The amount of cheque #1336 was for \$2,000. A handwritten note on the cheque states the reason for the payment as "Rent and City tax".
This information was obtained from the documents seized from the WTM TD Bank Account #4336-0928569, exhibit 2008-05, item 5. (79.6)
SIVARAMAN is one of the two owners of 4160 and 4162 Van Horne Avenue, which is occupied by the WTM. I believe that the banking records for the account of the WTM TD bank account #4336-928569, which were obtained with previous judicial authorizations, show a pattern of payment to SIVARAMAN since at least 2003. It also indicates that the WTM is still issuing cheques to pay for rent and the municipal taxes associated to 4160 and 4162 Van Horne Avenue, Montreal as of February 2008.
435. The cheques issued by the WTM to pay for the Rent and City Taxes were deposited in account #52811-80291-01162-89 held by SIVARAMAN and CHANDRASEGARAM at the Bank of Nova Scotia situated at 4861 Van Horne Avenue, Montreal.
This information was obtained from Mr. RONDEAU as referred to in his investigation report dated November 27th, 2007. (120.7)
436. I have reviewed a report titled "Mortgage Transaction History" concerning the mortgage #583636-6. This report outlines the payments schedule for the mortgage payments and the municipal property tax. Starting in February 2003, a substantial property tax increase is noticed. According to the mortgage agreement, the Bank of Nova Scotia continued to pay the property tax which incurred a deficit to the tax account. The accumulated deficit came to a total of \$10,082.91 as of September 1st, 2004. On September 21st, 2004, SIVARAMAN wrote a letter addressed to the Bank of Nova Scotia in which he stated having knowledge of the property tax deficit. SIVARAMAN agreed to pay the overdue tax by monthly instalments of \$2,000 starting October 5th, 2004.
This information was obtained from an agreement letter seized at the bank of Nova Scotia and signed by SIVARAMAN on September 21st, 2004 (120.8); and from the "Mortgage Transaction History" for the Bank of Nova Scotia. (120.5)
437. I have reviewed cheques seized at 4162 Van Horne Avenue, Montreal, on April 12th, 2006. The cheques are made by the WTM to SIVARAMAN for the rent and property tax of 4160 and 4162 Van Horne Avenue, Montreal. Below is a chart describing the cheques made by the WTM to SIVARAMAN for rent and city tax. Starting in September 27th, 2004, an increase of \$2,000 is noticed except for October 2004 whereas only an

extra \$1,000 is noticed.

Bank accounts	Cheque #	Amount	Date	Note on cheque
WTM TD bank account #4336-0928569	1083	\$1,000	July 10 th , 2004	Rent and City Tax
WTM TD bank account #4336-0928569	1089	\$1,000	August 8 th , 2004	Rent and City Tax
WTM TD bank account #4336-0928569	1098	\$3,000	September 27 th , 2004	Rent and City Tax
WTM TD bank account #4336-0928569	1103	\$1,000	October 10 th , 2004	Rent
WTM TD bank account #4336-0928569	1106	\$1,000	October 20 th , 2004	City Tax
Laurentian bank account #49255-3-01	1	\$3,000	November 4 th , 2004	Rent and City Tax
WTM TD bank account #4336-0928569	1117	\$3,000	December 9 th , 2004	Rent and City Tax
Laurentian bank account #49255-3-01	2	\$1,900	January 10 th , 2005	City
WTM TD bank account #4336-0928569	1124	\$1,100	January 11 th , 2005	Rent \$1,000 City \$100
WTM TD bank account #4336-0928569	1131	\$3,000	February 8 th , 2005	Rent and City Tax

This information was obtained from a bank statement and a cheque register located in a binder seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006, exhibit 2006-12, item 08. (91.1)

The WTM TD bank account #4336-0928569 is the one sought to be forfeited. As of August 2004, the WTM was issuing cheques for \$1,000 to SIVARAMAN with a notation for rent and city tax. Starting on September 27th, 2004, the WTM started issuing cheques for \$3,000 to SIVARAMAN with a notation to rent and city tax.

438. I have reviewed a WTM financial report for the month of September 2004, which included a cheque register that states cheque #1098 is a \$3,000 cheque made payable to SIVARAMAN for the rent and city tax.
This information was obtained from the financial report for the month of September, exhibit 2006-12 item 01 6/28, seized at 4162 Van Horne Avenue, Montreal on April 12th, 2006. (84.7)
Cheque #1098 is included in the diagram above. By recording the \$2,000 increase in their financial reports and providing a cheque to SIVARAMAN, I believe that the WTM is taking the responsibility to repay the tax, because this amount is equal to the amount agreed between SIVARAMAN and the Bank with respect to paying off the tax deficit. Paying the municipal tax deficit usually is an owner's responsibility, not a tenant's.
439. The banking records of the WTM for the period of February 2003 to February 2007, demonstrate that a cheque is issued every year to pay for the School Tax.
This information was obtained from Ms. GOURDEAU of PWGSC, as referred in her report, dated January 31st, 2008 (83)
I believe that the WTM pays for the School taxes levied on the building at 4160 and 4162 Van Horne, Montreal.
440. On January 30th, 2003, the WTM made an application to the "Commission Municipale du Québec" to obtain an exemption from the City of Montreal business taxes. In this application, the WTM declared being the only occupant of both 4160 and 4162 Van Horne Avenue, Montreal, including the basement. The WTM described the premises at 4160 and 4162 Van Horne Avenue as a community centre for the Tamil community. The WTM declared that the centre was promoting the Tamil culture by giving languages training, computer classes and organizing sports events for the children. Furthermore that the organization was financed by donations from the members amounting to approximately \$48,000 and an operating budget of \$45,000. The tax exemption was granted as the WTM was registered as a non profit organization.
This information was obtained from a letter dated January 30th, 2003, from the Municipal Commission of Quebec. (119.9)
The fact that the WTM described the premises at 4160 and 4162 Van Horne Avenue, Montreal as a community centre for the Tamil community demonstrates how the building is used as a business in lieu of a dwelling house.
441. In September 2004, SIVARAMAN and CHANDRASEGARAM renewed the mortgage number 583636-6 with the Bank of Nova Scotia for another five year term ending on September 1st, 2009. The mortgage payment including the principal and interest payment was set at \$548.99 while the property tax payment was set at \$545. This renewal agreement was signed by both owners on September 28th, 2004.
This information was obtained from the renewal agreement for mortgage #583636-6 at the Bank of Nova Scotia. (120.9)
CHANDRASEGARAM was not able to sign the agreement by September 1st, because he had returned to Canada on September 11th, having been in Sri Lanka participating in The Workshop for the Foreign Activists. (Subsection 9.2 refers)

14.3 WTM pays for expenses related to the building at 4160-4162 Van Horne Avenue

14.3.1 Hot water tank

442. In their financial report for the month of August 2004, the WTM reported an expense of \$300 to replace the hot water tank in their office. The expense was reported on a WTM expense voucher. The name on the voucher is Sivaram and dated August 5th, 2004. Also located with the financial report is a receipt from Réno Dépot store dated August 5th, 2004, for a hot water tank and plumbing supplies totalling \$345.61. The letters "WTM" were handwritten on the purchase receipt. **This information was obtained from a WTM expense voucher dated August 5th, 2004 (113.5); and from a Reno Depot receipt dated August 5th, 2004 (113.4)** *I believe that SIVARAM is SIVARAMAN. I also believe that SIVARAMAN paid for the hot water tank and was later reimbursed by the WTM as indicated in the above transaction recorded by the WTM. I believe that this demonstrates that the organization is paying for the repairs and maintenance of the building they occupy at 4160 and 4162 Van Horne, Montreal. This responsibility is normally assumed by the owner and not by a tenant.*

14.3.2 Office insurance

443. A review of the cheques written on the WTM TD bank account #4336-0928569 at the TD Canada Trust Bank in Montreal indicate that several cheques were drawn from this account to pay for the house insurance since 2003. Three cheques were issued to SIVARAMAN in 2003 to pay for the house insurance. A total of eight cheques were made payable to BESSETTE & Fils Inc for the house insurance between December 8th, 2003, and January 22nd, 2007. The amounts disbursed for the house insurance by the WTM are as follows:

YEAR	AMOUNT	PAYABLE TO
2003	\$2,196.54	SIVARAMAN
2004	\$2,663.50	BESSETTE
2005	\$2,835.73	BESSETTE
2006	\$2,835.72	BESSETTE
2007	\$1,432.88 (Up to February)	BESSETTE

This information was obtained from Cpl. BOUDREAU's investigative report, dated November 19th, 2007 (123.1); from exhibit 2007-03 Item 04 (106.2); from exhibit 2006-12, Item 08 (91.13); and from exhibit 2005-02, Item 09. (86.5) *In 2003, the WTM paid SIVARAMAN for the house insurance. Usually a tenant pays for insurance of the contents of the property and not the building. It is unusual to see a*

tenant pay the owner of the building for house insurance.

When considering that the WTM took as an expense the actual amount agreed upon by SIVARAMAN with the city to pay off the municipal tax deficit; that the WTM paid for the hot water tank replacement; and that the WTM paid SIVARAMAN for the house insurance, I believe that the WTM controls the building.

14.3.3 CHANDRASEGARAM is paid as an activist

444. The financial records of the WTM state that CHANDRABALAN/S. BALAN has been receiving monthly payments WTM since at least 2004. The WTM has up to three of their members on the payroll for their fundraising activities. The report also indicates that MURALI and MANIVANNAN also received regular monthly payments in 2005. Below is a chart representing the amount received by CHANDRABALAN/S. BALAN from 2004 to 2006.

Year	\$Amount
2004 (May to December)	\$3,600
2005 (12 months)	\$13,200
2006 (January only)	\$1,200
TOTAL	\$18,000

This information was obtained from Ms. GOURDEAU of PWGSC, as referred in her report, dated January 31st, 2008. (83)

I believe that CHANDRABALAN/S. BALAN is CHANDRASEGARAM, co-owner of the building at 4160 and 4162 Van Horne.

I believe that MURALI is THURAIRATNAM and MANIVANNAN is KURANANANTHASWAMY. I believe that all three individuals are paid activists of the WTM for their fundraising activities.

15 SURVEILLANCE ON WTM MEMBERS FOLLOWING THE LISTING OF THE LTTE AS A TERRORIST GROUP

445. *Following the listing of the LTTE on April 8th, 2006, the Montreal INSET established surveillance on the WTM members. Below are accurate portions of the aforementioned surveillance.*

15.1 **Surveillance at 4160-4162 Van Horne, Montreal and the municipal recycling depot located at 6925 chemin Côte-des-Neiges, Montreal**

446. On April 11th, 2006, THURAIRATNAM was observed leaving from the WTM office located on 4160 Van Horne Avenue, Montreal, with three unidentified males. They were

observed loading several cardboard boxes and a green plastic box into a Plymouth voyager licence plate 787KAX. All four individuals departed in the vehicle and were followed by the RCMP surveillance team. The vehicle went to a recycling site where the cardboard boxes were deposited in a dumpster. They were also observed dumping the contents of a green plastic recycling box into the container.

This information was obtained from Cpl. NEUWIRTH's report, dated April 19th, 2006 (47.2); and from Cpl. CLOUTIER's report dated April 11th, 2006 (47.1)

The Plymouth voyager licence plate 787KAX is registered to KURANANANTHASWAMY.

447. Cpl. NEUWIRTH kept the surveillance on the recycling bin until other officers retrieved the said boxes and their content from the recycling bin. The items were seized and brought back to RCMP Headquarters where the items were reviewed.
This information was obtained from Cpl. NEUWIRTH's report, dated April 19th, 2006 (47.2); and from Constable Blanchard BRIZARD's report ("Cst. BRIZARD") dated April 12th, 2006 (47.3)
448. The boxes contained various documents relating to the LTTE (i.e. calendars, posters,) to the financing of the WTM, such as spreadsheets, handwritten documents and others containing what appears to be amounts of money, bank monthly reports relating to pre-authorized payments credited to the WTM bank account, Tamil newspapers, WTM cultural events tickets, financial statements of the WTM for 2001. Several handwritten documents representing lists of donators with names, addresses and phone numbers and lists of Tamil businesses in Montreal who contribute to the WTM.
This information was obtained from Mr. RONDEAU's investigative report, dated April 11th, 2006. (47.4)
- Considering the fact that the LTTE was added as a terrorist group on the list of entities in Canada on April 8th, 2006, I believe that the WTM was in the process of getting rid of documents linking them to the LTTE.*
449. Based on these observations, Cpl. BOUDREAU had reasonable grounds to believe that offences related to terrorist financing had been committed and obtained two Search Warrants granted by Justice of the Peace Louis DUGUAY on April 12th, 2006, in Montreal. The Warrants authorized the search of the offices located at 4160 and 4162 Van Horne Avenue, Montreal. Investigators executed the Warrants to search on April 12th, 2006, and obtained evidence consistent with terrorist fundraising activities by the WTM and evidence linking the leader of the WTM, THURAIRATNAM, to the LTTE.
This information was obtained from Search Warrant #500-26-039292-069(23.5) (Appendix 3 - Schedule A); and from Search Warrant #500-26-039293-067(23.6) (Appendix 3 - Schedule B)

The execution of the above mentioned Search Warrants started at approximately 7:00pm and lasted 12 hours. During the execution of the Search Warrants, the leader of the WTM, THURAIRATNAM, was observed transporting items from his residence located at [REDACTED] to 7720 Pie IX, unit 1, Montreal, which I will explain further in the following subsection.

15.2 Surveillance of THURAIRATNAM on April 12th, 2006

450. I have read a surveillance report dated April 12th, 2006, where police officers of the surveillance team observed the activities of THURAIRATNAM. I believe that the following is an accurate account of the most relevant observations made during that surveillance on April 12th, 2006, in and around the city of Montreal:

- At 5:48pm, THURAIRATNAM stepped out of his residence located at [REDACTED], and left driving a grey Plymouth Voyager licensed 787KAX, registered to KARUNANANTHASWAMY;
- At 6:10pm, THURAIRATNAM arrived at 4160 Van Horne Avenue;
- At 6:27pm, THURAIRATNAM and SITHAMPARANATHAN exited 4160 Van Horne Avenue and left in the grey Plymouth Voyager licensed 787KAX. The surveillance on the grey Plymouth Voyager licensed 787KAX was maintained; *At the time THURAIRATNAM and SITHAMPARANATHAN left 4160 Van Horne Avenue, Montreal, the execution of the Search Warrant had not yet started. The execution of the Search Warrant started at approximately 7:00pm.*
- At 7:34pm, the surveillance members observed that the grey Plymouth Voyager licensed 787KAX was immobilized at the corner of Légaré Street and Barclay Avenue, Montreal. This location is approximately four blocks away from the WTM office on Van Horne Avenue. SITHAMPARANATHAN exited the vehicle and walked to the driver side. Simultaneously, SITHAMPARANATHAN appeared to be talking on a cellular phone. At 7:37pm, SITHAMPARANATHAN returned in the vehicle;
- At 7:40pm, a grey Toyota Camry licensed 356RKJ, registered to SANGARAPILLAI RAVINDRARAJAH, parked behind the grey Plymouth Voyager licensed 787KAX. THURAIRATNAM and SITHAMPARANATHAN climbed into the grey Toyota Camry licensed 356RKJ while the vehicle remained parked; *I believe SANGARAPILLAI RAVINDRARAJAH is one of the 36 WTM activists; (45.2)*
- At 7:49pm, THURAIRATNAM stepped out of the grey Toyota Camry licensed 356RKJ and got into the grey Plymouth Voyager licensed 787KAX. CHANDRASEGARAM stepped out of the grey Toyota Camry licensed 356RKJ and got into the passenger side of the grey Plymouth Voyager licensed 787KAX;
- At 8:01pm, the grey Plymouth Voyager licensed 787KAX was in the parking lot of the Côte-Des-Neiges mall. THURAIRATNAM and CHANDRASEGARAM stepped out of the grey Plymouth Voyager licensed 787KAX and got into a black Toyota Camry licensed 145NVL which was already occupied by three unknown individuals. 145NVL is registered to THEIVENDRAM RAVICHANDRAN of Montreal, a WTM member who is known as RAVI. Approximately, two minutes later, the black Toyota Camry licensed 145NVL stopped in the parking lot next to a green Honda Accord licensed 615HBC, which was registered to CHANDRASEGARAM. CHANDRASEGARAM stepped out of the black Toyota Camry licensed 145NVL and left alone in the Honda. CHANDRASEGARAM was

not followed. The black Toyota Camry licensed 145NVL proceeded East with THURAIRATNAM as a front passenger. The surveillance was maintained on THURAIRATNAM;

- At 8:30pm, the black Camry licensed 145NVL parked in the alley behind [REDACTED]. THURAIRATNAM entered the building from the back while the driver appeared to use a cellular phone;
- At 8:49pm, THURAIRATNAM returned to the black Camry licensed 145NVL while carrying two plastic bags, a yellow and a blue one that he placed near the front passenger side. THURAIRATNAM climbed on the driver side and left with an unknown passenger male. A minute later, the black Camry licensed 145NVL was stopped at the intersection of Valois and Rachel Streets. The unknown passenger male walked towards an apartment building;
- At 8:54pm, the unknown male returned to the black Camry licensed 145NVL with a black back pack with white stripe and a square transparent plastic box that he laid inside the trunk of the black Camry licensed 145NVL. The unknown male went into the driver side while THURAIRATNAM was on the passenger side. The surveillance was maintained on black Camry licensed 145NVL;
- At 9:06pm, the black Camry licensed 145NVL stopped on Paul Huet Street near Pie-IX Boulevard due to a flat tire on the black Camry licensed 145NVL;
- At 9:12pm, THURAIRATNAM flagged a taxicab licensed T118528. Both THURAIRATNAM and the unknown male removed from the trunk a transparent plastic box, a black backpack and two plastic bags and put them in the trunk of the taxi cab. The taxicab licensed T118528 left with THURAIRATNAM and the unknown male;
- At 9:18pm, the taxicab licensed T118528 stopped in front of 4191 Jean Rivard, Montreal, and both THURAIRATNAM and the unknown male ("unknown male 1") stepped out of the taxicab licensed T118528. THURAIRATNAM and the unknown male 1 removed the black backpack, the transparent plastic box and two bags from the trunk of the taxicab licensed T118528. A second unknown male ("unknown male 2") joined THURAIRATNAM and unknown male 1. THURAIRATNAM and unknown male 1 proceeded to load the black backpack, the transparent plastic box and the two plastic bags into the trunk of a Pontiac Grand Am licensed 080YHT, registered to KANDAVANAM RAVISHELVAM of Montreal;
I believe that KANDAVANAM RAVISHELVAM is one of the 36 WTM activists. (45.2)
- At 9:21pm, THURAIRATNAM climbed on board of the driver seat, unknown male1 sat at the rear passenger seat, while unknown male 2 sat in the front passenger seat of the Pontiac Grand Am licensed 080YHT. The Pontiac Grand Am licensed 080YHT left and drove to an apartment building located at 7720 Pie-IX Boulevard;
- At 9:25pm, unknown male 1 and unknown male 2 removed the black backpack,

the transparent plastic box and the two plastic bags from the trunk of the Pontiac Grand Am licensed 080YHT and carried the items inside the building at 7720 Pie-IX, Montreal;

- At 9:32pm, both men came out of 7720 Pie-IX Boulevard and got back into the Pontiac Grand Am licensed 080YHT driven by THURAIRATNAM. The Pontiac Grand Am licensed 080YHT arrived at the site of the flat tire on Paul Huet Street, where the individuals proceeded to fix the flat tire of the black Camry licensed 145NVL;
- At 9:34pm, members of the surveillance team confirmed that the apartment where the two unknown males went inside was 7720 Boulevard Pie-IX, unit 1. **This information was obtained from the observations of the surveillance team as referred to in Constable H el ene GOURGUE's report dated April 12th, 2006. (124)**

451. Based on these observations, Cpl. BOUDREAU had reasonable grounds to believe that offences of terrorist financing had been committed and obtained two Search Warrants granted by Justice of the Peace Louis DUGUAY on April 13th, 2006, in Montreal. The Warrants authorized the search of the residences located at 7720 Pie-IX Boulevard, unit 1, Montreal and [REDACTED]. Investigators executed the Warrants to search on April 13th, 2006, and obtained evidence consistent with terrorist fundraising activities by the WTM and evidence linking the leader of the WTM, THURAIRATNAM, to the LTTE. **This information was obtained from Search Warrant #500-26-039303-064 (23.7) (Appendix 3 - Schedule C); and Search Warrant #500-26-039302-066. (23.8) (Appendix 3 - Schedule D)**

I believe that the information related in the above paragraphs indicates that THURAIRATNAM, the leader of the WTM, was in the process of moving the items seized in the black backpack, the transparent plastic box and the two bags. Considering the fact that Search Warrants were taking place at the WTM office, it is my opinion that THURAIRATNAM was in the process of hiding documents linking the WTM to the LTTE. These documents were primarily transported from [REDACTED] to 7720 Pie IX Boulevard, unit 1, Montreal. As previously mentioned, THURAIRATNAM resides at [REDACTED]

452. The items seized from the above-mentioned locations can be itemized as follows:
- 4160 Van Horne Avenue, Montreal; (See Appendix 3 - Schedule A)
 - 4162 Van Horne Avenue, Montreal; (See Appendix 3 - Schedule B)
 - 7720 Pie-IX Boulevard, unit 1, Montreal; (See Appendix 3 - Schedule C)
 - [REDACTED]; (See Appendix 3 - Schedule D)
 - 6925 Chemin C ote-des-Neiges, Montreal (recycling bin). (See Appendix 3 - Schedule F)

16 EVIDENCE TO SUPPORT THE APPLICATION FOR FORFEITURE OF THE ITEMS SEIZED

453. I have reviewed the exhibit reports for 4160-4162 Van Horne Avenue, 7720 Pie-IX

Boulevard, unit 1 and [REDACTED]. As previously described in this Affidavit, persons departing the WTM office on April 11th, 2006, were observed removing cardboard boxes from the WTM office and bringing them to the Eco-centre located at 6925 Cote-des-Neiges. The boxes contained various documents relating to the LTTE (i.e. calendars, posters,) to the financing of the WTM, such as: spreadsheets; handwritten documents containing what appears to be amounts of money; bank monthly reports relating to pre-authorized payments credited to the WTM TD bank account; Tamil newspaper; WTM cultural events tickets; financial statements of the WTM for 2001; several handwritten documents representing lists of donators with names, addresses and phone numbers; and lists of Tamil businesses in Montreal who contribute to the WTM. These observations occurred after April 8th, 2006, the date of the listing of the LTTE as a terrorist entity in Canada. The details of the observations are previously mentioned in this Affidavit.

454. As set out earlier, Cpl. BOUDREAU had reasonable grounds to obtain four Search Warrants granted by Justice of the Peace Louis DUGUAY on April 12th, 2006, and on April 13th, 2006, in Montreal. The Warrants authorized the search of the premises located at 4160 and 4162 Van Horne Avenue, Montreal, and the residences located at 7720 Pie-IX Boulevard, unit 1, Montreal, and [REDACTED]. Investigators executed the Warrants to search on April 12th, 2006, and on April 13th, 2006, and obtained evidence consistent with terrorist fundraising activities by the WTM. A brief description of the materials located in these venues is described below:

16.1 4160 Van Horne Avenue, Montreal on April 12th, 2006

455. I have reviewed the exhibit report in relation to the properties seized at 4160 Van Horne Avenue, Montreal, on April 12th, 2006. The facility is clearly an office. The material seized from 4160 Van Horne Avenue, Montreal is itemized and attached to "**Appendix 3 - Schedule A**" of this Affidavit.
456. Upon my review of the exhibit report for 4160 Van Horne Avenue, Montreal, I noted that several items seized are linked to the WTM and the LTTE. Below is an excerpt of some of these items, as a description of the exhibits items are detailed in the exhibit report attached to "**Appendix 3 - Schedule A**" of this Affidavit
- An Internet copy advising of the listing of the LTTE as a terrorist group;
 - Several plastic jars with the logo of the LTTE, containing money;
 - Several Pre-Authorized Payment Plan forms for the WTM fundraising;
 - Several documents with names, addresses and amounts of money;
 - Several brown envelopes containing money;
 - Several binders containing the WTM financial reports;
 - Several computers;
 - Multi media paraphernalia (CD, VHS, DVD and audio cassettes) with the picture of PRABHAKARAN, the leader of the LTTE;
 - An LTTE flag;
 - Several books with the picture of PRABHAKARAN on the cover; Several articles of clothing with the logo of the LTTE or the logo of the Martyr's Day;
 - Several photos of PRABHAKARAN, the leader of the LTTE.

This information was obtained from my review of the exhibit report of Cpl. CLOUTIER, dated April 12th, 2006, pursuant to Search Warrant #500-26-039292-069.

16.2 4162 Van Horne Avenue, Montreal April 12th, 2006

457. I have reviewed the exhibit report in relation to the properties seized at 4162 Van Horne Avenue, Montreal, on April 12th, 2006. The facility is clearly an office with classrooms. The material seized from 4162 Van Horne Avenue, Montreal is itemized and attached to "Appendix 3 - Schedule B" of this Affidavit.
458. Upon my review of the exhibit report for 4162 Van Horne Avenue, Montreal, I noted that the several items seized are linked to the LTTE. Below is an excerpt of some of these items, as a description of the exhibits items are detailed in the exhibit report attached to "Appendix 3 - Schedule B" of this Affidavit :

- The booklet titled The Workshop for the Foreign Activists;
- A picture of PRABHAKARAN, the leader of the LTTE;
- Several binders containing financial reports of the WTM,
- 9 binders labelled M1 to M9;
- Several sheets with names, addresses and amount of money due;
- Several plastics jars with the LTTE logo, containing money; One blank Pre-Authorized Payment Plan form;
- Several white envelopes containing money;
- Several transaction history reports for the WTM TD bank account #4336-0928569;
- 4 computers.

This information was obtained from my review of the exhibit report of Cpl. CLOUTIER, dated April 12th, 2006, pursuant to Search Warrant #500-26-039293-067.

16.3 7720 PIE IX Boulevard, unit 1, Montreal

459. I have reviewed the exhibit report in relation to the properties seized at 7720 PIE-IX Boulevard, unit 1, Montreal. The material seized from 7720 PIE-IX Boulevard, unit 1, Montreal is itemized and attached to "Appendix 3 - Schedule C" of this Affidavit.
460. Upon my review of the exhibit report for 7720 PIE-IX Boulevard, unit 1, Montreal, I noted that the several items seized are linked to the LTTE. Below is an excerpt of some of these items, as a description of the exhibits items are detailed in the exhibit report attached to "Appendix 3 - Schedule C" of this Affidavit :

- The LTTE Operations Manual;
- The booklet titled The Workshop for the Foreign Activists;
- Several blank Pre-Authorized Payment Plan forms;
- A black and yellow pack sack containing financial reports linked to the WTM;
- A school rental agreement form for the WTM, dated November 26th, and 27th, 2005;

- Several envelopes containing money;
- Several documents containing financial reports of the WTM;
- The name of SITHAMPARANATHAN, the president of the WTM, written on an envelope;
- 10 postal cards with the photo of PRABHAKARAN, the leader of the LTTE;
- Several calendars depicting the LTTE logo and soldiers;
- Several pictures of PRABHAKARAN, the leader of the LTTE;
- Photos of THURAIRATNAM with PRABHAKARAN and with colonel SOOSAÏ;
- A USB key.

This information was obtained from my review of the exhibit report of Cst. BRIZARD, dated April 13th, 2006, pursuant to Search Warrant #500-26-039303-064.
I believe that some of these exhibit items were transported from [REDACTED] during the execution of the Search Warrants at 4160 and 4162 Van Horne Avenue, Montreal.

[REDACTED]

461. I have reviewed the exhibit report in relation to the properties seized at [REDACTED]. The material seized from [REDACTED] is itemized and attached to "Appendix 3 - Schedule D" of this Affidavit.
462. Upon my review of the exhibit report for [REDACTED], I noted that the several items seized are linked to the LTTE. Below is an excerpt of some of these items, as a description of the exhibits items are detailed in the exhibit report attached to "Appendix 3 - Schedule D" of this Affidavit :

- Several calendars with the photo of PRABHAKARAN, the leader of the LTTE;
- Several magazines depicting a photo of PRABHAKARAN, on the cover;
- Several types of multi-media linked to the LTTE;
- A computer;
- Several LTTE flags.

This information was obtained from my review of the exhibit report of Cst. BRIZARD, dated April 13th, 2006, pursuant to Search Warrant #500-26-039302-066.
As noticed, no document related to the financing of the LTTE via WTM was located at THURAIRATNAM's residence. I believe that this could be explained by the fact that THURAIRATNAM transported these financial documents and other pertinent documents, such as the LTTE Manual Operations and The Workshop for the Foreign Activists, to 7720 Boul Pie-Ix, unit 1, in order to avoid the seizure of these said documents if a Search Warrant was to be executed at this residence.

463. On April 10th, 2008, a Special Search Warrant #DES-9-08 to seize property was granted by the Honourable Mr. Justice François Lemieux, Judge of the Federal Court, pursuant to paragraph 83.13(1)(a) of the *Criminal Code*. The Warrant authorized the seizure of the above-mentioned properties (Schedules A, B, C, and D) located at the RCMP Headquarters at 4225 Dorchester Boulevard., Westmount, Quebec, Canada. This Warrant was executed on April 11th, 2008, in respect of the properties previously seized on April 12th, 2006, and April 13th, 2006.
This information was obtained from Special Search Warrant #DES-9-08, dated April 10th, 2008. (23.13)

16.5 4160 and 4162 Van Horne on September 3rd, 2008

464. I have reviewed the exhibit report in relation to the properties seized at 4160 and 4162 Van Horne Avenue, Montreal on September 3rd, 2008. The facility still appeared to be an office with classrooms. The material seized from 4160 and 4162 Van Horne, Montreal on September 3rd, 2008 is itemized and attached to "**Appendix 3 - Schedule E**" of this Affidavit.
465. Upon my review of the exhibit report for 4160 and 4162 Van Horne Avenue, Montreal, I noted that the several items seized are linked to the LTTE. Below is an excerpt of some of these items, as a description of the exhibits items are detailed in the exhibit report attached to "**Appendix 3 - Schedule E**" of this Affidavit :
- Several calendars with the photo of PRABHAKARAN, the leader of the LTTE;
 - Several magazines and books depicting PRABHAKARAN and LTTE;
 - Several types of multi-media linked to the LTTE;
 - Several photos and picture frames of PRABHAKARAN and/or the LTTE;
 - Several 2008 ULAHATHAMILAR newspapers;
 - Several LTTE flags;
 - Several coffee mugs, clocks, key chains and stickers;
 - Several posters and signs.

This information was obtained from the report of investigative assistant Mrs. JACQUES dated February 7th, 2009. (125)

Based on the seizure of LTTE related items and financial reports of the WTM, and the totality of the grounds set out in this Affidavit, I believe that these items mentioned at the 4 different addresses above, were property owned by a terrorist group, the WTM, on behalf of another terrorist group, the LTTE.

17 TESTIMONY OF SITHAMPARANATHAN, THE PRESIDENT OF THE WTM

466. I have read the testimony of SITHAMPARANATHAN, dated May 16th, 2007, and May 17th, 2007. SITHAMPARANATHAN testified at the Quebec Court, under an Application for Detention of things seized pursuant to section 490(3) of the *Criminal Code* before the Honourable Judge Louise VILLEMURE. During his testimony, SITHAMPARANATHAN unveiled the following facts in regards to the WTM in Montreal and the LTTE. Many of the statements made by SITHAMPARANATHAN confirm the facts revealed throughout this Affidavit. Below are excerpts of SITHAMPARANATHAN's testimony:
- SITHAMPARANATHAN is the president of the World Tamil Movement (WTM);
As stated in line 18 of page 2 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
 - SITHAMPARANATHAN said that: "Our Organization is the main one, the chief one, and the other organizations are like auxiliary or branch organizations";
As stated in lines 6-7-8 of page 3 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.

I believe that SITHAMPARANATHAN, the president of the WTM, referred to the WTM when he mentioned the "main one" and that he referred to the sub-organizations, when he mentioned "auxiliary or branch organizations".

- SITHAMPARANATHAN said that the Tamil community in Montreal knows about the WTM;
As stated in lines 14-15 of page 3 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that Muralee Karan lives at [REDACTED] and that THURAIRATNAM has a responsible job at the WTM;
As stated in lines 24-25 of page 5 and line 4 of page 6 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
I believe he was referring to Muralee Karan THURAIRATNAM.
- SITHAMPARANATHAN said that since the seizure at the WTM on April 12th, 2006, the amount of donation has decreased;
As stated in line 13 of page 6 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that THURAIRATNAM is the treasurer of the WTM;
As stated in lines 7-8 of page 14 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that several images of PRABHAKARAN were displayed at the WTM;
As stated in lines 1-2 of page 16 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that PRABHAKARAN was the leader of the Tigers and of the Sri Lankan Tamils. SITHAMPARANATHAN said that PRABHAKARAN is a freedom fighter and added that the LTTE is a group that fights for the rights of the Tamils. The LTTE are also known by the name of Tamil Tigers. SITHAMPARANATHAN also mentioned that PRABHAKARAN is leading a struggle to win the rights of the people of Sri Lanka;
As stated in lines 2-3-22-24 of page 18 and lines 10-11 of page 19 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that most Tamil people in Montreal support the LTTE;
As stated in line 23 of page 19 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- When asked if the WTM supports the LTTE, SITHAMPARANATHAN answered that the WTM supports only the good or right actions of the LTTE;
As stated in line 20 of page 21 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
- SITHAMPARANATHAN said that he has been working with the WTM since 1993;
As stated on page 46 of SITHAMPARANATHAN's testimony, dated May 17th,

2007.

- SITHAMPARANATHAN confirmed attending a workshop given by the LTTE in Sri Lanka between July 20th, 2004, and July 30th, 2004;
As stated in line 14 of page 43 and lines 16 to 21 of page 45 SITHAMPARANATHAN's testimony, dated May 16th, 2007.
 - SITHAMPARANATHAN said he knew that the LTTE was listed as a terrorist group in Canada and that they are a terrorist organization under the United Nations since 2001;
As stated in lines 17 to 20 of page 46 and lines 1 to 10 of page 47 SITHAMPARANATHAN's testimony, dated May 16th, 2007.
 - SITHAMPARANATHAN confirmed hoisting the LTTE's flag on July 25th, 2004, at the LTTE Workshop. He said that he was forced to hoist the flag;
As stated in lines 10-13 of page 49 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
 - SITHAMPARANATHAN said that he attended Martyr's Day on November 27th, 2004, to honour the deceased of the LTTE's cause;
As stated in line 10 to 12 of page 60 and lines 7 and 8 of page 61 of SITHAMPARANATHAN's testimony, dated May 16th, 2007.
 - SITHAMPARANATHAN said that the WTM updates the LTTE about their activities;
As stated in page 24 of SITHAMPARANATHAN's testimony, dated May 17th, 2007.
 - When asked about CHANDRASEGARAM, SITHAMPARANATHAN answered that he is the co-owner of 4160 and 4162 Van Horne Avenue and that he is a member of the WTM and offers services to their community;
As stated in page 25 of SITHAMPARANATHAN's testimony, dated May 17th, 2007.
 - When asked about the connection between the WTM and the Tamil Tigers, SITHAMPARANATHAN responded that they contact the LTTE when they want to know about the Tamil people who are living in Sri Lanka because they have been abandoned by the Sri Lankan Government.
As stated in page 42 of SITHAMPARANATHAN's testimony, dated May 17th, 2007.
- This information was obtained from the testimony of SITHAMPARANATHAN, dated May 16th, 2007 (126.1); and from the testimony dated May 17th, 2007. (126.2)**

PART III**18 A SUMMARY OF THE FACTS UPON WHICH I BASE THIS BELIEF IS AS FOLLOWS**

18.1 Links between the LTTE and the WTM

467. As seen in earlier paragraphs, the LTTE has committed acts of terrorism in Sri Lanka. Between February 2003 and April 7th, 2006, the LTTE was a terrorist group as it fell under paragraph "a" of the definition of a terrorist group, as indicated in subsection 83.01(1) of the *Criminal Code*. On April 8th, 2006, the LTTE were added to Canada's list of terrorist entities and now fell under paragraph "b" of the definition of a terrorist group, as indicated in subsection 83.01(1) of the *Criminal Code*.
468. The LTTE, through its International Secretariat, has issued a document called the Re-Organization of Foreign Branches of the Liberation Tigers of Tamil Eelam, referred to as the LTTE Operations Manual in this Affidavit, in which they dictate precisely how they want their foreign branches to be structured and operated. The WTM is a foreign branch for the LTTE in Canada that is structured and operated as per the directives established by the LTTE.
469. The WTM's main activities are propaganda and fundraising in support of the LTTE. As seen earlier in this Affidavit, the WTM organised events, such as the Martyrs day, Black Tigers Day and the Celebration of the TRO as propaganda for the cause of the LTTE. The WTM also follows the directives of the LTTE Operations Manual when they raise funds by using the following fundraising methods: The Pre-Authorized Payment Plan, the Construction Fund, the TEEDOR Fundraising forms, the revenues obtained from the collection of the Tamil people by the activists and the Tamils Savings Fund.
470. The LTTE dispenses training sessions in Sri Lanka for their foreign activists. This LTTE Workshop was attended by members of the WTM. As seen in previous paragraphs, CHANDRASEGARAM, PERAMPALAM and the president of the WTM, SITHAMPARANATHAN, are known to have attended the LTTE Workshop, which was held in Sri Lanka from July 20th, 2004, to July 30th, 2004. In his testimony, SITHAMPARANATHAN revealed to the court that he was at the LTTE Workshop and evidence was seized by the police which demonstrate that CHANDRASEGARAM and PERAMPALAM had attended the aforementioned LTTE Workshop. In addition, the LTTE leader, PRABHAKARAN, was present at the July 2004 Seminar for the Foreign Activists and posed for photos with the participants, such as CHANDRASEGARAM and PERAMPALAM.
471. PRABHAKARAN is an emblematic figure of the LTTE that is venerated by WTM members, and his photo can be seen on most LTTE paraphernalia and inside the WTM's office at 4160 and 4162 Van Horne Avenue, Montreal. Several of the items seized by the police have the picture of PRABHAKARAN adhered to them. Moreover, SITHAMPARANATHAN, the president of the WTM, declared in his testimony given on May 16th, to May 17th, 2007, that there were pictures of PRABHAKARAN at the WTM office.
472. To summarize, the WTM is comprised of members whose duties are to collect funds and perform duties as per the wishes of the LTTE.

18.2 CHANDRASEGARAM - co-owner of 4160 and 4162 Van Horne Avenue

473. CHANDRASEGARAM is a member of the WTM and a paid activist. On September 11th 2004, CHANDRASEGARAM returned to Canada from Sri Lanka carrying documents and items related to fundraising activities of the LTTE, such as the 119 Pre-Authorized Payment Plan forms. Also in his luggage was his certificate from the LTTE Workshop as a foreign activist. A photo seized by the police depicts CHANDRASEGARAM receiving his LTTE Workshop's certificate from the hands of PRABHAKARAN.
474. CHANDRASEGARAM took part in several events which helped finance the LTTE, such as Martyr's Day and Black Tigers Day.
475. The financial records of the WTM states that CHANDRASEGARAM has been receiving monthly payments for his fundraising work with the WTM since at least 2004. The WTM have up to three of their members on the payroll for their fundraising activities. This demonstrates the level of involvement of CHANDRASEGARAM in the activities of the WTM in support of the LTTE.
476. CHANDRASEGARAM also took part in gathering funds for the Tamils Savings Fund. This fundraising activity was to demand loans ranging from \$2,500 to \$50,000 from families, businesses and prominent members in the Tamil community. This fundraising was being conducted aggressively in the Montreal area. CHANDRASEGARAM ensured that the Tamils Savings Fund contracts were recorded in the WTM finance. Among the items seized by Montreal INSET were four group of receipts containing the Tamils Savings Fund contracts for a total of \$137,000 gathered from December 2005 to March 2006.
477. Numerous fund transfers to the LTTE were also handled by CHANDRASEGARAM using his personal bank accounts at the Royal Bank of Canada (account #0631-8230864) or at the TD Trust Canada Bank (account #359-6270618). An amount of \$105,000 was recorded as external expenses in the WTM financial report, which I believe makes reference to money transferred to the LTTE International Secretariat from the WTM: CHANDRASEGARAM's name is linked to all these transfers.

18.3 SIVARAMAN – Co-owner of 4160 and 4162 Van Horne Avenue

478. SIVARAMAN is listed as one of the administrators for the Eelam Tamil Association of Quebec (ETAQ). This organization gave its address as 4162 Van Horne Avenue, Montreal. This address is located on the 2nd floor of the house occupied by the WTM at 4160 Van Horne Avenue, Montreal. As mentioned earlier, ETAQ is an organization responsible for administering Tamil schools known as "Onriyam". In their financial report, the WTM refers on occasion to funds from these schools as the Eelam Tamil Association School Fund. In May 2004, the WTM organized a Tamil language competition in which the ETAQ enrolled several students as well as other organizations. The total amount of money assembled from the 2004 Tamil language competition was \$3,116.56. This WTM financial report was located at 4162 Van Horne Avenue, the address given by ETAQ. This clearly shows a link between the WTM and SIVARAMAN.
479. The Tamil Rehabilitation Organization (TRO) is not a company registered in Quebec, however, SIVARAMAN is known as being a TRO representative in Quebec. TRO Canada has been known to send money to TRO Sri Lanka, which is controlled by the

LTTE.

480. SIVARAMAN was present during the 2007 Martyr's Day event and during the unveiling of the monument in front of 4160 Van Horne Avenue, Montreal in October 2004, monument that he helped build.
481. As stated earlier, the banking records of the WTM indicate that cheques have been issued to SIVARAMAN on a monthly basis to pay the rent and the municipal taxes of 4160 and 4162 Van Horne Avenue, Montreal. These cheques issued by the WTM were deposited into SIVARAMAN and CHANDRASEGARAM's bank account #52811-802910116289, held at the Bank of Nova Scotia situated at 4861 Van Horne Avenue, Montreal. Based on the review of a report titled "Mortgage Transaction History", a substantial property tax increase was noticed in February 2003. Upon the mortgage renewal in September 1st, 2004, the municipal taxes showed a deficit for a total of \$10,082.91. In a letter signed by SIVARAMAN and addressed to the Bank of Nova Scotia, SIVARAMAN agreed to pay the overdue tax by monthly instalments. Cheques seized by Montreal INSET showed that the cheques for the overdue tax were made by the WTM to SIVARAMAN. I believe that it is unusual for tenants to pay for the municipal taxes; therefore I believe that the WTM controls the building at 4160 and 4162 Van Horne Avenue, Montreal. Moreover, the hot water tank was replaced at the WTM office as stated in their financial report. The expense was reported on a WTM expense voucher in the name of SIVARAMAN and dated August 5th, 2004. Unlikely would tenants pay for the repairs and maintenance of a building. This task is usually assumed by the owner. This again gives reasons to believe that the WTM has control of 4160 and 4162 Van Horne Avenue, Montreal.

18.4 SITHAMPARANATHAN - The President of the WTM

482. SITHAMPARATHAN identified himself to Cpl. BOUDREAU as being the president and an active member of the WTM.
483. SITHAMPARANATHAN was accompanied by other WTM members at the Pierre-Elliott TRUDEAU Airport in Montreal in July 2004 as they left for their LTTE activists training in Sri Lanka. Also seized by the Montreal INSET was a photo of SITHAMPARANATHAN at the Seminar for the Foreign Activists in Sri Lanka. In a LTTE document seized by Montreal INSET, it states that SITHAMPARANATHAN raised the national flag at the Seminar for the Foreign Activists on July 25th, 2006.
484. SITHAMPARANATHAN gave a testimony at the Quebec court, in which he revealed and confirmed facts in regards to the LTTE and the WTM. To recapitulate, SITHAMPARANATHAN said the following:
- The amount of donation has decreased since the seizure at the WTM on April 12th, 2006;
 - Several images of PRABHAKARAN were displayed at the WTM building at 4160 Van Horne Avenue, Montreal;
 - Most Tamil people in Montreal support the LTTE;
 - The WTM supports only the good or right actions of the LTTE;
 - He attended The Workshop for the Foreign Activists in Sri Lanka between July

- 20th, 2004, to July 30th, 2004;
- He is aware that the LTTE is a terrorist group;
- He attended the Martyr's Day on November 27th, 2004, to honour the deceased of the LTTE's cause;
- The WTM updates the LTTE regarding their activities;
- CHANDRASEGARAM is a member of the WTM who offers his services to the Tamil community.

18.5 The building- 4160 and 4162 Van Horne Avenue, Montreal

485. On July 27th, 1999, SIVARAMAN and CHANDRASEGARAM obtained a mortgage in the amount of \$109,000 from the Bank of Nova Scotia to cover part of the purchasing price for the property of 4160 and 4162 Van Horne Avenue, Montreal.
486. On August 2nd, 1999, SIVARAMAN and CHANDRASEGARAM purchased the property with all the buildings thereon erected and more specifically those bearing the civic numbers 4160 and 4162 of said Van Horne Avenue, in the City of Montreal, Province of Quebec. The property was purchased for \$149,000.

18.6 The Fundraising by the WTM is controlled and administered from its offices at 4160 and 4162 Van Horne Avenue, Montreal

487. The offices of the WTM are located at 4160 and 4162 Van Horne Avenue, Montreal. These two civic addresses represent the first floor and second floor of a duplex originally set up for two residences. Each address has its own entrance door and access to the outside through a common outside door. The premises located at 4160 Van Horne Avenue has been arranged with a large reception area with a counter and business like setup including a computer and filing cabinets. Also found in this area is a lounging area with sofas, a television and three flags display on floor stands. Those are the Canadian, the Quebec and the LTTE flags. In this reception area there were also several large display cabinets containing multiple LTTE propaganda items for sale. Those items were seized by Montreal INSET on April 12th, 2006.
488. During the search of the office of the WTM at 4160 Van Horne Avenue, Montreal, documents relating to the administration of the Pre-Authorized Payment Plan for monthly donations to the WTM were seized. Those documents were located in a filing cabinet situated behind the reception counter of the WTM located at 4160 Van Horne Avenue, Montreal. Those documents contain a handwritten list of persons with their address and a sequential number before each name. Each person also has a corresponding amount written on the right side of the document. The more common amount entered is \$2,500. This list represents a journal of the donators to the LTTE Tamils Savings Plan collected by the WTM in Montreal. The sequential numbers located in front of each name, and the amount written for each person, correspond to the numbered Tamils Savings Plan form filled in the name of those persons.
- This demonstrates that the fundraising method called Tamils Savings done by the WTM in support of the LTTE was controlled and administered from the offices of the WTM located at 4160 and 4162 Van Horne Avenue, Montreal.*

489. During the search of the WTM office located at 4162 Van Horne Avenue, Montreal on April 12th, 2006, more documents relating to the Pre-Authorized Payment Plan were located. It includes a list of donators to the WTM by way of the Pre-Authorized Payment Plan at the TD Bank for the years 2003 and 2004. Located in an administration office of the WTM at 4162 Van Horne Avenue, Montreal were nine black binders individually marked M1 to M9. Those binders were found to contain donator's lists, fundraising forms and other documents relating to the fundraising activities of the WTM. The marking M1 to M9 represents the nine collection areas for the greater Montreal area as designated by the WTM. These binders were located on a bookshelf inside the administration office of the WTM.
490. The WTM monthly financial reports for the years 2004 and 2005 seized from the office of the WTM located at 4162 Van Horne Avenue, Montreal, on April 12th, 2006, were used to report on the operation and administration of the WTM to the LTTE International Secretariat. Each report contains the monthly expenses and revenues for the WTM. In the revenues, there is a category called income through the bank. Those amounts correspond to the monthly revenues from the Pre-Authorized Payment Plan.
This demonstrates that the WTM kept the bookkeeping records of their organization in the office located at 4162 Van Horne Avenue, Montreal.
491. In addition to the Pre-Authorized Payment Plan Forms and the Tamils Savings Fund forms, several other documents relating to the WTM financial reports were located by Montreal INSET when they executed the Search Warrants at 4160 and 4162 Van Horne Avenue, Montreal. Among the item seized were letters from the WTM to the International Secretariat in Sri Lanka, in which the WTM describes their expenses as far as the fundraising events or the collection from the newspapers.
492. The above described documents relating for instance to the collection of donations to the WTM through a banking Pre-Authorized Payment Plan system, demonstrate that the premises at 4160 and 4162 have been used to administer this fundraising scheme. Further, that the above described premises have been used for the storage and safe keeping of documents used to raise funds in support of the LTTE.
493. As seen earlier, several of the sub-organizations give their address as being 4160 or 4162 Van Horne Avenue, Montreal. This demonstrates how these sub-organizations are controlled by the WTM. Moreover, the fact that several financial statements linked to these sub-organizations were located during the seizure of April 12th, 2004, at the offices of the WTM, establishes the care and control of the WTM over the sub-organizations as well as over the building located at 4160 and 4162 Van Horne Avenue, Montreal.

18.7 The WTM TD bank account #4336-0928569

494. The WTM monthly financial reports for the year 2004 and 2005 were seized from the office of the WTM on April 12th, 2006. These internal financial documents are prepared by the person in charge of finance for the branch, which in most cases was THURAIRATNAM. They are used to report on the operation and administration of the foreign branch in Quebec to the LTTE International Secretariat. Each report contains the day to day expenses and revenues for the WTM. In the revenues, there is a category called income through the bank. I have compared these amounts with the

monthly revenues from the Pre-Authorized Payment Plan and they are the same. I used the amounts reported to the WTM by the TD Canada Trust Bank on a monthly basis. The pre-authorized payments are deposited electronically into the WTM TD bank account #4336-0928569. The report sent to the customer is called Transmission History report and contains the list of all the donators with information such as the amount debited from the donators account and its bank account number and bank identification.

495. As stated earlier by some of the witnesses interviewed by the investigators of Montreal INSET, they had to sign a Pre-Authorized Payment Plan form in Canada or in Sri Lanka to be able to travel freely in Sri Lanka's LTTE controlled area and visit members of their families. Moreover, CHANDRASEGARAM came back on September 11th, 2004, with 119 Pre-Authorized Payment Plan forms in which some of the witness forms were found. I believe that the fact that CHANDRASEGARAM came back from Sri Lanka and arrived in Montreal with the Pre-Authorized Payment Plan forms, demonstrates a close connection between the LTTE and the WTM.
496. Clearly, members of the WTM used the WTM TD bank account #4336-0928569, mainly for the purpose of receiving the pre-authorized payments which help financing the LTTE. A review of the statements provided by the witnesses' shows that the pre-authorized payments are not always given voluntarily as one would expect. Those victims are coerced into contributing to a cause that they do not entirely agree with, therefore, it is my belief that the TD Canada Trust account is used primarily to finance the LTTE, a terrorist group.

18.8 Exhibit items

497. Some of the exhibit items seized in Project CRIBLE have been used to support my grounds of belief throughout this Affidavit. Since all the exhibits items are linked to the WTM, they are all pertinent in affirming that the WTM supports the LTTE financially.

19 CONFIDENTIALITY

498. I believe, due to the nature and circumstances of this ongoing investigation, that the public access to or knowledge of the entirety of this Affidavit and some of its exhibits would be detrimental to the informants and witnesses, and that it is in the best interest of the administration of justice to issue an Order denying public access to the vetted paragraphs of this Affidavit as well as to the vetted exhibits until further order of the Court. I base my belief upon the following:
- The confidentiality and the security of the informants is a primary concern. The informants provided the information to the police with the understanding that their identity be kept confidential for security reasons. I believe that the unveiling of the information included in the vetted paragraphs and exhibits might reveal the identity of those informants;
 - I am also mindful to the fact that our investigation has revealed that the World Tamil Movement and the LTTE have been demonstrated to utilize pressure tactics to elicit funds and donations as well as to participate in veiled threats.

Given earlier grounds, it is my belief that should members of the World Tamil Movement discover the contents of the vetted paragraphs and exhibits they would revisit those witnesses to discourage their participation in future cooperation with the police. These witnesses have cooperated with the police at certain risk to themselves in an effort to provide information related to the pre-authorized debit scheme. The contents of those vetted paragraphs and exhibits, if circulated in the public domain, would likely discourage further cooperation from members of the Tamil community;

➤ [REDACTED]

➤ [REDACTED]

499. [REDACTED]

20 **SERVICE AND REGISTRATION**

500. Any notice or delivery of material required by or in relation to the present Application shall be effected as follows:

The Attorney General of Canada
Claudine DIB, Counsel for the Director of Public Prosecutions
Public Prosecution Service of Canada
Quebec Regional Office
4225 Dorchester Boulevard., 6th Floor
Westmount (Quebec) H3Z 1V5
Tel: (514) 939-8639
Fax: (514) 939-8460
File: 1-194207

501. A copy of this Affidavit shall be served (by a peace officer, a bailiff, registered mail, publication in a newspaper distributed in the locality of the last known address or by leaving a copy at the office of the Court) on the following parties:

➤ **Thanasegaram CHANDRASEGARAM**

[REDACTED]

C/O Mr. Steven G. Slimovitch
Counsel
507 Place d'Armes, Suite 1590
Montreal (Quebec) H2Y 2W8

➤ **Sivanathan SIVARAMAN**
[REDACTED]

C/O Mr. Steven G. Silmovitch
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➤ **World Tamil Movement of Quebec**
4160, 4162 Van Horne Avenue
Montreal (Quebec) H3S 1S1

C/O Mr. Steven G. Silmovitch
Counsel
507 Place d'Armes, Suite 1590
Montreal (Quebec) H2Y 2W8

21 RELIEFS REQUESTED

502. I make this Affidavit in support of an Application for an Order of Forfeiture pursuant to Section 83.14 (1)(a) of the *Criminal Code* in respect of the said Properties described in Appendix 1 located at 4160 and 4162 Van Horne Avenue, Montreal, Quebec, Canada and Appendix 2, the WTM TD Bank Account #4336-0928569 located 8200 Boulevard Decarie, Montreal, Quebec, Canada, and Appendix 3 - Schedules A, B, C, D and E, located at 4225 Dorchester, Westmount, Quebec.

**Dated at Westmount, Quebec,
this 31st day of March, 2009**

(s) *Steve Dubreuil*

Corporal Steve DUBREUIL

**Solemnly declared before me in
Westmount, Quebec, this 31st day of March, 2009**

TRUE COPY

(s) *Suzanne Paquette*

**Suzanne Paquette
Commissioner of Oaths in all
judicial districts for the Province of Quebec
#146 287**

**Me CLAUDINE DIB
Counsel for the Director of
Public Prosecutions**