



*True North In Canadian Public Policy*

# Straight Talk

March 2014

## *Straight Talk:* With Jeanne Flemming

**Following the money to the bad guys: In this instalment of *Straight Talk*, MLI speaks with Jeanne Flemming, former director of the Financial Transactions and Reports Analysis Centre of Canada, or FINTRAC, about the dangers that organized crime poses to Canada, and how we can better use financial transactions data to stop it.**



Jeanne Flemming began her career in the federal Public Service with the Department of National Health and Welfare, then moved to the Federal-Provincial Relations Office and was a Policy Analyst with the Ministry of State for Social Development. She held a number of executive level positions with the Department of Indian Affairs and Northern Development.

In 1993 she joined the then Canada Customs and Revenue Agency (CCRA) as Executive Assistant to the Minister and later was Special Adviser to the Deputy Minister. In 1995 she was appointed Director General of Special Investigations, and in 1999 became Director General of International Tax and was appointed Assistant Commissioner Appeals Branch in 2003.

She moved to the Treasury Board Secretariat in 2007 as the Assistant Secretary for Social and Culture. She finished her federal career with an appointment by the Prime Minister as the Director of FINTRAC in 2008. She retired in 2012 after 35 years of service.

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## **MLI: Do Canadians appreciate how vulnerable we are to transnational economic crime?**

**Flemming:** It is my belief that Canadians are extraordinarily naïve. By this I mean that we collectively have taken to heart our “good guy” image, which certainly exists, but because we are trapped in that vision we fail to entertain the notion that there are bad guys among us who use our strong financial institutions and non-financial businesses and professionals (casinos, money services businesses, lawyers) for nefarious purposes. Canadians do not fully appreciate the prevalence and impact that organized crime activity has on our society. I believe Canadians would be shocked to know just how much criminality exists in this country. We only have to look at the recent revelations of corruption in Quebec to get a glimpse of the extent to which this element has already undermined our institutions. Does anyone believe that these events are unique to Quebec?

It is the mandate of the regime of which FINTRAC is but one player to protect our institutions. Once your institutions are corrupted, a country is in trouble.

## **MLI: How was FINTRAC created and why?**

**Flemming:** FINTRAC was created in 2000 through the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)*. Its mandate was to receive, collect, analyse, and disclose financial transactions related to money laundering to the appropriate authorities if the intelligence met certain legal criteria. During the 1980s, the desire to develop a global anti-money laundering strategy crystallized in 1988 with the adoption of the *United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances*. Enveloped within this approach was the concept of “proceeds of crime” and the removal of these funds from the criminal element, which was added to Canada’s Criminal Code at the time. The Criminal Code provision would now provide another tool to investigators to attack criminal enterprises by creating offences for money laundering activity.

If police were to be successful in pursuing money laundering cases, they would need information about financial transactions. Unless financial institutions and other reporting entities provided the information, police could not get access to financial records without judicial authorization.

The financial sector would be required to provide financial transaction data. The focus at this time was on cash transactions flowing from the drug trade whether in the form of large transactions or suspicious transactions. And if you are going to collect financial data you need a central institution to do so. Thus the concept of the Financial Intelligence Unit (FIU) was born with the US leading the way with the creation of the first FIU in 1990.

This global system was directed by the Financial Action Task Force (FATF), a spawn of the G-7/8, which provided policy direction to the creation of the FIUs worldwide. Canada was late getting into the FIU business and needed “encouragement” from the FATF to create an FIU which was finally done in 2000.

## **MLI: How does FINTRAC Work?**

**Flemming:** It is important to understand that FINTRAC is only one element of a regime created to fight money laundering, and later terrorist financing, although it is often seen as the “face” of the regime as it is the only new institution created to do so. Therefore, it is often expected to bear the burden of the “success” of the whole regime.

Let me explain the “regime”. Canada’s fight against money laundering and terrorist financing is supported by many entities. The Department of Finance is mandated to manage the legislation and regulations setting out the regime, its players, and their respective roles. Outside of government, the so-called reporting entities must provide certain information on financial transactions to FINTRAC. These include banks, financial institutions, casinos, securities firms, money services businesses, and others. FINTRAC’s role is to receive the financial transactions data from these reporting entities and

through analysis turn it into intelligence, which is disclosed to recipients designated in the legislation if it meets certain legal criteria.

FINTRAC receives some 60,000 electronic financial transactions records daily. It has a regulatory compliance role to play with the reporting entities to ensure they live up to the letter and the spirit of the legislation. FINTRAC analysts take this data along with other data that is collected within the law and finds patterns and relationships that tell a story about the transactions, their beneficiaries, their movement and locations. When FINTRAC reaches the required legal threshold it must make a tactical disclosure to the appropriate designated recipient.

The next players in the regime are the many designated recipients of the financial intelligence that FINTRAC produces. Some would be the RCMP, Sûreté du Québec, Ontario Provincial Police, municipal police forces, Canada Border Services Agency, Canada Revenue, Canadian Security Intelligence Service, and so on. These are the investigating bodies who then turn financial intelligence into evidence to pursue cases, no easy task.

The next phase in the regime focuses on the prosecution services, whether federal or provincial, which may or may not lay charges, plea bargain as they see fit, and prosecute criminals. The complexity of the criminal justice system is quite overwhelming but defence lawyers are astute and understand how to manage the system to the best advantage of their clients.

My point in describing the “regime” is to underline three issues that continue to perplex many people: a) no one player carries the burden of the regime; b) no one player “owns” the regime; and c) there is no strategic plan within the regime to ensure all work together to further mutually defined goals. Furthermore, as there is no “owner” of the system, the reporting of performance is fragmented and never provides a holistic view of its success or even where it can be strengthened. Although evaluations have been attempted, in my view they have reflected the fragmented nature of the regime by reporting on each player individually without a mechanism to provide a horizontal view.

So as much as parliamentarians and others would like to determine the success of FINTRAC, it is impossible to do so without an in-depth horizontal view, which is lacking to date.

### **MLI: From FINTRAC’s perspective, what is the difference between money laundering and terrorist financing?**

**Flemming:** Money laundering arises when the proceeds of crime are utilized in any fashion. Therefore, by definition one is looking at actions that have already taken place. From FINTRAC’s perspective, their intelligence is attempting to put together the “transaction story” to aid investigators following the money, in finding the evidence, or by showing the methods used to transfer money in an organized crime group. By comparison, with terrorist financing, FINTRAC is looking at financial transactions and the patterns that emerge in order to throw light on terrorist groups to provide financial intelligence to investigators for them to thwart actions that might occur, or for them to understand more completely the inner workings of terrorist groups. I am not sure parliamentarians or Canadians understand the difference.

### **MLI: How did 9-11 change things?**

**Flemming:** It is trite to say that it changed everything, but it certainly did in the intelligence world. For FINTRAC, it changed its mandate by adding counterterrorist financing to its responsibilities in 2001. This was no easy element to add as FINTRAC was barely up and running when this occurred. And, the terrorist financing piece was simply “glued” on to the original legislation rather than being thoroughly thought through. All over the western world similar changes were underway with the FATF leading the way with new policies that FIUs would have to adapt to their regimes.

The other huge change was the sense of vulnerability that arose in the west, particularly in the US, which had to come to grips with an attack on its home territory. I'm not certain Canadians have the same perception of our vulnerability, as our "good guy" myth seems to trump realities. The terrorist threat is real.

Lastly, those events shifted the public's perception of the privacy balance, that is, most people in western countries were more willing to trade privacy for safety.

### **MLI: Do we have the right international system in place to address money laundering and terrorist financing?**

As I noted, the current international system to attack money laundering, in particular, was set in place in the 1980s to fight drugs and remove the cash generated through drugs. Two issues flow from this approach: a) the methods used to launder money have changed dramatically due to technological changes and globalization, and b) one has to question the drug policies around the world as abolition has proven ineffective and likely has caused more harm than any good it may have done.

Furthermore, with the creation of cybercurrencies or digital currencies such as bitcoin we have entered a new era that I would argue we are unprepared for. In the most recent Budget the federal government, to its credit, has signalled that it will address the issue of digital currencies. The FATF recommendations certainly do not address cybercurrencies as they were not dreamt of in the 70s.

What we have in place via the FATF policies is the "lowest common denominator" of policies that could be agreed upon. With varying interests the international agreement world is one of continual compromise. Further, there are now approximately 180 countries who have set up FIUs according to the FATF standards to have an acceptable FIU, that is, they have passed legislation that meets the FATF criteria.

Within that multitude of countries with FIUs one can find sophisticated operations, those with little or no capacity to execute their legislative responsibilities, those that are corrupt, and many who use their FIU as "window dressing" to show the world they are FATF compliant. Meeting the complex standards set out by the FATF is difficult for most countries and impossible for many.

### **MLI: Do we have the right regime in place for Canada?**

**Flemming:** Canada has mostly complied with the FATF standards although it's fair to say that we were never "legislative leaders" and our regime has many gaps and holes. For example, lawyers are not covered by the system yet most if not all sophisticated schemes used by organized criminals to move money around the world require the expertise of lawyers as intermediaries to create the corporate structures and other entities required to bridge the criminal and the legitimate economies. The lawyers are fighting the Canadian government in court. Dealers in luxury goods such as art works, antiques, and high-end cars are not covered under the *PCMLTFA*, nor are pay loan companies, owners of white label ATMs, and many others.

To give credit where it is due, Canada did a fine job in creating a world-class FIU. By being forward-looking Canada is one of only two or three countries that includes electronic fund transactions in its legislation. The US is just catching up with us now – Australia was the leader. This data includes all financial transactions coming or going from the country \$10,000 and over. A positive step was taken several years ago with the FATF's inclusion of tax evasion as a predicate offence in its standards, which Canada adopted. Another promising step was made in last year's Budget giving the Canada Revenue Agency (CRA) access to that financial transaction data. On a less promising note, the CRA just disbanded its Special Enforcement Program aimed at taxing the criminal element.

To go back to the original purpose of the global system, that is, to remove the proceeds of crime, we should be looking more at the methods to remove these proceeds such as through the tax system, civil forfeiture, and other methods.

One of the greatest impediments in Canada to a better regime, as mentioned previously, is the lack of a strategic planning process among the various players to provide a coordinated operational approach. One has to wonder what is wrong with a system where large organized crime groups continue to thrive. Even the RCMP testified in Italy several years ago that the Rizzuto organization was part of a consortium to build a bridge between Sicily and Calabria at Messina. To do that you need access to many millions if not billions of dollars. It's hard to argue that we have the right regime in place when known career criminals can bid on such a project.

Lastly, one could question the "teeth" of the legislation in Canada. Canada's approach regarding those who must report financial transactions to FINTRAC has been more service oriented than enforcement. While the rest of the western world has laid many criminal charges against banks, casinos, and others, not a single criminal charge has been laid in Canada. Indeed, in the US in January of this year two bitcoin operators are faced money laundering charges while in Canada we are just thinking about addressing the issue. Are Canadian banks, casinos, and so on more honest and respectful of the law than others? I don't believe so. Why are we so reluctant to prosecute? Is it a failure of will or the legislation? I believe it's a failure of will.

On the civil side, a look at Canada's record is no more encouraging. The Department of Finance and FINTRAC take a very gentle approach to administrative penalties and to date the numbers have been few with small amounts lodged against the erring reporting entities. Again, is there a failure in the legislation? I believe it is a lack of will to enforce.

**MLI: Have we struck the right balance in terms of access and privacy?**

**Flemming:** The balance between an individual's right to privacy and government's desire for more information is always a difficult one to strike for policy-makers. Canadians' expectation of privacy is one of the highest in the western world. Why is this? Is this expectation reasonable? I leave this issue for others to debate. All I can say is that equation is always shifting as it did after 9-11 when individuals were willing to trade off privacy for safety.

**MLI: How do you react to concerns of the Privacy Commissioner that FINTRAC is keeping too much personal data?**

**Flemming:** I would begin by stating that the Privacy Commissioner (PC) has been put in the very awkward position of providing the oversight for FINTRAC as a result of legislative changes in 2006. Given that the PC's role is to restrict to the extent possible Canadians' information being used for a variety of purposes it must be difficult to oversee an intelligence organization whose role it is to ferret out information (within the law). I would certainly agree that FINTRAC, like all intelligence organizations, needs some oversight but to place that burden on the PC is neither helpful nor wise.

Regarding the issue that FINTRAC is keeping too much personal data, the PC was commenting on the unfortunate reality that the reporting entities often send in inappropriate information that they were instructed to avoid. An example would be social insurance numbers, which FINTRAC has no legal right to possess. Information arrives electronically to FINTRAC with no human review as the volume is simply too great. The easiest way to fix this problem is to somehow force the reporting entities to not send it. Given that they are already instructed not to do so and given that there are some hundreds of thousands of potential reporting entities this has not worked. FINTRAC's goal is to protect information and to ensure inappropriate information is not used. So they sequester the information. The PC agrees that the information is sequestered and has never been used by FINTRAC. So in my view, a cost-benefit analysis shows it does not make sense to go to the considerable expense of removing this information.

**MLI: What challenges emerge from handling so much data?**

**Flemming:** The first challenge is a practical one, that is, the IT challenge both on the side of the reporting entities who must put their transaction reports into electronic format to submit them to FINTRAC and on FINTRAC's side in receiving such volumes. The next challenge familiar to anyone dealing with large data sets is the data integrity. The PC worries about certain types of information sliding through while FINTRAC has to concern itself with the integrity of the approximately 1.6 million transactions received each month.

The next challenge is creating and maintaining the analytic capacity to manipulate the data to produce financial intelligence that meets the legal test set out in the legislation prior to disclosure. While much of the data analysis is supported by technology, intelligence analysts still must apply their analytic skills to convert data into usable intelligence that meets the legal threshold. Protecting the data from internal and external inappropriate use is a constant challenge and FINTRAC is justifiably proud of its record in doing so, as verified by the PC with the one exception referred to previously.

**MLI: Are law enforcement and security agencies equipped to follow up the leads from FIUs?**

**Flemming:** When FINTRAC was created I think it was a huge challenge for both law enforcement and security agencies to understand and deal with the resulting financial data. Through education, usage, and strategic secondments between and among the various players I believe that challenge has been mitigated for the most part. The volume of intelligence on money laundering going to law enforcement in particular is an ongoing challenge. The police in particular serve so many different needs that it is often a fact that the urgent takes priority over the important. For example, when the Olympics took place in Vancouver, the security of the Games overtook the demands of money laundering caseloads. Society views local criminality as a greater threat than organized crime. The threat to our institutions through organized crime is neither well understood nor well communicated by politicians nor the police. Turning intelligence into evidence is not an easy task for law enforcement and is an ongoing challenge in a world where many expect instant results. Many believe every disclosure from FINTRAC should lead directly to a conviction. To expect such a result is simplistic at best and foolish at worst.

Furthermore, the government must begin to see the regime as a whole system in terms of its management. It is not productive to strengthen one part of the regime as it did in the most recent Budget with a significant increase in FINTRAC's allocation, while starving those in the regime who use FINTRAC's financial intelligence. An increase in the volume of work from FINTRAC will not help when the RCMP and the Public Prosecution Service are being cut back. This makes no sense.

I must comment on Mr. Vito Rizzuto's recent funeral in Montreal. If you were not aware you would have thought that he was a high level dignitary given the media coverage. However, one could argue that that man and his criminal organization caused more harm to his community and this country than anyone else I can think of. They are alleged to have corrupted all the local governments in and around the Montreal area and caused countless deaths and made huge sums of money – most of which likely was tax free and still untouchable somewhere in the world.

My questions are: Why as a society do we not see these groups for what they are? And why are politicians unable to provide the resources law enforcement needs to take on these groups? I can tell you that what I saw in the cases developed by FINTRAC and passed on to law enforcement scared me.

**MLI: FINTRAC has been around since 2000. What have we learned?**

**Flemming:** A great deal! We have learned the power of financial intelligence as both a tactical and strategic tool used to attack organized crime and terrorist financing. However, it is still in its infancy, having only been used worldwide for some 23 years and in Canada for a mere 14 years. Nothing moves without money. We've learned that organized crime and terrorist groups are exceedingly complex entities requiring sophisticated operations to work effectively. We've learned that the creation of the

global regime to combat these threats has impacted these groups, who have had to work harder and create ever more complex transactions to keep the cash flowing. We've learned about the intricate linkages between the legitimate economy and the illegitimate one. We've learned that technology is changing the nature of organized crime. We've learned that "connecting the dots" among and between law enforcement and security agencies is extremely difficult and is likely among the many advantages provided to organized crime and terrorist organizations.

Another interesting fact has arisen since the inception of FINTRAC and the current regime. Money laundering has three phases: a) placement (putting cash into the system); b) layering (moving proceeds around to cover its source); and, c) integration (making it "disappear" into the legitimate economy). Most of those who are required to report have learned to be on the lookout for the first step, that is placement, and have become reasonably adept at reporting. However, I would posit that few if any are looking at the next two steps. Some reporting entities have told me that they consider it a mistake for them to be required to report as they do not take cash. This gives money launderers an easy way to move money around if they can get it into the system in the first place.

**MLI: What changes to legislation or to operations do you think would be most effective in helping take advantage of FINTRAC's work and to prosecute more cases?**

**Flemming:** Some important changes have been made in the recent Budget by providing certain FINTRAC transaction information to CRA for tax administration purposes. Some work needs to be done to make this happen but I believe this is a major positive step in using the financial data housed in FINTRAC for public policy purposes. Further, the recent parliamentary review of the regime could bring forward more positive changes. The restrictions placed between the use of strategic and tactical intelligence bears some reviewing.

We need a national "champion" to educate the public regarding the regime rather than the narrow focus on one or two aspects of the regime as is done when left to the parliamentarians or the media. We need leadership within the regime to speak for the regime as a whole rather than allow its various pieces to defend each of its more limited mandates. It is a regime that stands or falls as a regime. We need performance measures that span the regime. We need a strategic operational plan for the regime that forces it to work horizontally to achieve mutually defined goals.

We must get away from the simplistic notion that a money laundering prosecution is the acid test to measure the success of the regime. Perhaps at its inception the "prosecution" measure was sold to pass the legislation, but that was and is not helpful. A set of horizontal measures could provide a better, more holistic view of just what is going on.

Lastly, the political class must be educated to the reality of what is happening under our noses and have the fortitude to stand up and support law enforcement to the level required to take action before the events of Montreal are replicated across the country.

**MLI: How can the international effort to tackle money laundering and terrorist financing be improved?**

**Flemming:** From a policy perspective, as this is an international system designed by the FATF it might be time for them to review its mandate in an electronic, almost cashless world. It might be timely, as some have suggested, to review drug strategies as the "war on drugs" has been a dismal failure.

From an operational perspective I think the FATF has taken an important step forward in launching a new round of evaluations of the various regimes around the world looking this time at effectiveness of performance rather than the strictly legal perspective.

Domestically I would conclude with a question: Rather than look at the cost of assigning more resources to organized crime and economic crime I would turn it around ask, what is the cost of not doing so?

## **RECOMMENDATIONS**

- 1) The Canadian public and politicians need to look past the nation's "good guy" image to see the real threat of organized crime here, and properly resource the law enforcement needs to take on these groups.
- 2) Canada needs a new oversight regime for FINTRAC that does not rely on the Privacy Commissioner, whose office is ill-suited to the task.
- 3) We need leadership within the anti-money laundering and terrorist financing regime, of which FINTRAC is only a part, to speak for the regime as a whole rather than allow its various pieces to defend their more limited mandates.





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