

S.C.C. File No. 37325.

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE BRITISH COLUMBIA COURT OF APPEAL)

Between:

Angleland Holdings Inc., Nederland Holdings Inc., John English
Paradise Beach Resorts Inc., and Pacific Rim Resort.

Appellants

And:

Gregory N. Harney Law Corporation dba Shields Harney
and Gregory N. Harney, as Solicitor

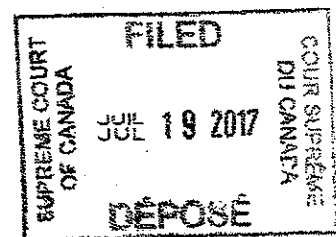
Respondents

AFFIDAVIT 1 OF WILLIAM ROBERT MAJCHER

I, William Robert Majcher, Businessman and Financial Crimes Consultant, currently residing in Hong Kong, China.

DO SOLEMNLY SWEAR THAT:

1. That I am authorized by all of the Appellants herein to make this affidavit and I have personal knowledge of the facts and matters hereinafter deposed to, except where stated to be made on information and belief, in which case I verily believe the same to be true.
2. That I am a Canadian citizen and served as an officer with the Royal



Canadian Mounted Police ("RCMP") from July 19, 1985 until August 15, 2007. I served primarily as an undercover investigator for the majority of my career infiltrating and surveilling major organized crime and money laundering operations in Canada, the United States and elsewhere overseas. Since retirement, I have assisted several government agencies on matters related to UN Sanctions pertaining to development of Nuclear Weapons, the World Bank's Stolen Asset Recovery Initiative, and Government Kleptocracy and Money Laundering.

3. That I have received several Letters of Commendation from the RCMP, FBI, and other police forces for meritorious service.

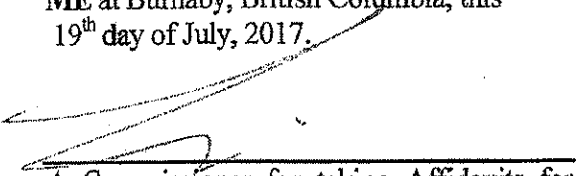
4. That during the course of my employment with the RCMP while working undercover or in handling criminal informants, I became tasked with knowledge and evidence of payoffs, bribery and case fixing that included judges, lawyers and court registry staff in various parts of Canada. In several instances, I was recording direct conversations and Part V1 Wiretap Authorizations that were in place and being monitored by other members of the RCMP. Some examples would include Project DELVE, which at the time was considered the most complex undercover financial crime investigation ever conducted by the RCMP. I spent three years working with the RCMP and FBI as a Futures and Options Commodity Trader, primarily based on the floor of the Winnipeg Commodity Exchange, where I engaged or observed all manner of illegal market activities. During the course of this investigation I gained the trust of senior participants at the Winnipeg Commodities Exchange who advised me that if I ever found myself involved in a criminal or civil litigation, I was to use a specific lawyer in Winnipeg. This lawyer had a relationship with a Judge, whereby the lawyer would meet at Synagogue with the Judge and review the case. The Judge would then advise what would be the outcome pending the nature of the litigation, thus allowing me to know my downside risk prior to entering the court room. I inquired how I could be sure I would get that specific judge if I was to go to court and it was explained to me that a senior Court Registry official in Winnipeg belonged to the same Curling Club as several of my targets from Project DELVE, and for a case of Whisky he ensured that the judge that was wanted would be selected. During Project O-EPOS, I had over 60 hours of Judicially authorized recorded conversations with a senior member of the Law Society of Upper Canada, who readily laundered several hundred thousand dollars of cash held out to be the

proceeds of cocaine sales. This lawyer asked me to file a false affidavit on behalf of another prominent lawyer relating to the seizure of USD \$1,000,000 in cash during a routine police check that was believed to be the proceeds of crime. This lawyer boasted to me how he represented a corporate client in the Ontario Superior Court during a litigation with a US based corporation and that "the other side had a pretty good case" but when the verdict came down it was so in favor of this Ontario lawyer that he "almost fell off his chair". This lawyer then laughed and told me he and the judge once had a very personal relationship and in fairness either he or she should have recused themselves. This same lawyer also said I should use his law office to make phone calls to my criminal organization due to the extraordinary privileges granted to lawyers in Canada as wiretaps on law offices were pretty much impossible in Canada. I have several other instances of interacting directly with lawyers to facilitate money laundering and financial crimes where they boasted about the legal license provided to lawyers in Canada to game the Canadian legal system to facilitate my fictitious criminal organization, including the provision of "independent 3rd party legal opinions", to provide a legal framework for structuring an illegal corporate action typically to mask money laundering or a public markets fraud. All communications are recorded on video and audio. Refer Project Bermudashort (FBI), Project EPOS (RCMP).

5. It is my personal experience and opinion; there are some lawyers across Canada who enjoy a relationship with certain members of the judiciary and / or court registry staff, which is well known among certain members of the criminal underworld. When those members of the criminal underworld want a case heard by a specific judge they are able to use one of these lawyers to facilitate a friendly judge to be assigned to their case.

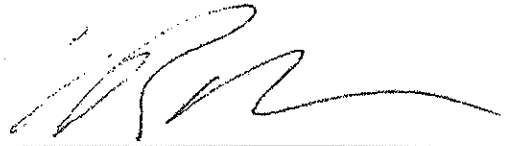
6. In several instances, my co-workers and I reported our concerns about corruption in the administration of justice to senior members of the RCMP and DOJ, who refused to investigate or bring charges against any of the lawyers, judges or court registry staff involved in the corruption.

SWORN (OR AFFIRMED) BEFORE)
ME at Burnaby, British Columbia, this)
19th day of July, 2017.)



A Commissioner for taking Affidavits for)
the Province of British Columbia)

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WILLIAM MAJCHER