

--POTENTIAL FOR SIMILAR ACTIVITY--

Coastal Land Activity in BC

- **Oceanfront Real Estate:** Companies like BC Oceanfront and LandQuest® Realty are actively marketing properties along the coast, including Vancouver Island, Quadra Island, and even remote private islands.
- **Private Islands for Sale:** There's a strong push toward acquiring **eco-islands** and **off-grid properties**, some of which are already sold to private buyers. These islands often come with moorage rights, cabins, and development flexibility.
- **Conservancy & Zoning Loopholes:** Some listings mention **no zoning** or **conservancy value**, which could be attractive for organizations seeking minimal regulatory friction.

If a Framework is pursuing land near coastlines, they're likely leveraging these kinds of listings and legal structures to secure strategic parcels—possibly for environmental, economic, or geopolitical reasons?

1. Nomura Holdings & Structured Notes

- Interestingly, Nomura America Finance recently filed a pricing supplement for **Callable Contingent Coupon Index-Linked Notes**, which are **guaranteed by Nomura Holdings**.
- These kinds of instruments are often used by **large trusts or investment entities** to **diversify holdings**, including real estate-backed securities.

2. Blackrock Real Estate Trustee recently passed away which would fit this Framework

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1) How the “Belize trust → trustees → bank → developer → buyer” scheme would map onto Canadian real estate

Mechanically, a scheme would try to reproduce the Gran Pacífica pattern by having:

- * an offshore trust or IBC hold legal title (or hold a Canadian corporation that holds title),
- * trustees or directors (possibly offshore) with formal power to sign transfers,

* a bank or financing vehicle retain encumbrance/mortgage, and

* buyer-occupiers who are beneficiaries (or who have long-term leases) but not legal owners until conditions are met.

That setup can give *practical* control to trustees/bank/developer rather than to purchasers — but in Canada that control is not invisible to authorities or to lawyers conducting standard real-estate and corporate due diligence.

2) Potential issues revealed to me personally through this investigation

1. **Beneficial-ownership transparency & reporting (FINTRAC).**

Federal corporations must file individuals with significant control; beneficial-owner information is now being collected and registries/filing obligations expanded. FINTRAC guidance requires reporting entities to identify and verify beneficial owners. This said, FINTRAC has been hiding what I believe is a forged document after failing to disclose said document over an information request, which only serves to protect ECI Development and its constituents. This has been, according to their email to me, allegedly forwarded to the OSC for this investigation, and I have personally made a complaint in regards to the validity of hiding this document as it is apparently something I signed.

2. **Actual property control under a Trust**

****Net effect:**** while the law is set up to catch *indirect* acquisitions, if FINTRAC, AML, RCMP, and other agencies have failed to catch ECI Development for 20 years in this Trust structure against, what is likely hundreds of Canadians, it is highly probable these same loopholes are being used to hole Canadian assets through the same, or similar channels.

3) Which specific laws or obligations would likely be broken if someone used an offshore trust to hide control of Canadian property?

* **Breach of the Prohibition on the Purchase of Residential Property by Non-Canadians Act** (if the purchaser or controller is a non-Canadian and the acquisition is direct or indirect). ([Justice Laws][1])

* **Failure to disclose beneficial ownership** to Corporations Canada / FINTRAC where required (and misleading filings). ([ISED Canada][5], [FINTRAC][2])

* **Tax reporting / evasion offences** under the Income Tax Act and related trust reporting rules if taxable Canadian property is held and not properly reported or tax is avoided. ([Canada.ca][7], [Wolters Kluwer][6])

* **AML / PCMLTFA violations** if funds for acquisition are laundered or suspicious transactions go unreported by reporting entities. ([FINTRAC][8])

* Potential **fraud, misrepresentation, or conspiracy** offences if purchasers were told they had secure title when, in fact, legal title/control was retained offshore. (Civil remedies would also be available to defrauded buyers.)
