

IBSYS CANADA

Case history

Fraud Investigation- Initial study and report by Vijay Mohire- Nov 2012 to Feb 2013

Mr. Mashuqul Chowdhury, President, CEO

IBSYS CANADA

1 Yonge St Suite 1801, Toronto, ON M5E 1W7

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Executive Summary

The purpose of this document is to walk through the history of the IBSYS company right from its creation to its current state to highlight the irregularities and systematic evasion of record and accounts reporting and book keeping. This will focus on the key members of the company, partners, board of directors, who were involved in the companies transactions and business development in other countries.

The document tries to bring in the different characters and roles played by the senior members of the company that resulted in loss for other members. This document will try to showcase the business details, modus operandi, irregularities if senior members for overseas business development.

This document is being written on behalf of the plaintiff Mr Mashuqul Chowdhury alias Abir Chowdhury who is the prime victim of the fraudulent transactions and irregularities that have been conducted by Mr Mashfiqul Chowdhury's alias Amoi Chowdhury. The details provided herewith have evidences in various forms includes physical print outs, email records, Invoices, Receipts from Service providers and similar material that will be used to prove the innocence of the plaintiff and lodge a complaint against Mr Mashfiqul Chowdhury who is also the brother of Mr Mashuqul Chowdhury .

To avoid confusion in names the alias names (Abir and Amoi) will be used through the document. This document will act as the main source of reporting that will act as evidences. Please use the material here for the benefit of the plaintiff who is pleading for justice and to draw at a logical conclusion in order to protect him from being victimized in the future

Case background

In year 2003 two brothers Mashuqul and Mashfiqul started a company IBSYS Canada a Telco company that is headquartered in Toronto, Canada. Company main business is international calling card minute based business. Mashuqul's wife, Mrs. Farhana Chowdhury was appointed as company secretary. Mr. Mashfiqul was assigned additional responsibility of managing the financial matter and business development of company in other countries including Middle East (Qatar, Dubai, Saudi Arabia), Bangladesh, India, and Singapore. The company was incorporated as per Canadian Company registration act at Provincial and Federal level and it was legally operating for several years.

As part of the company business expansions Mashfiqul was deputed to various countries and business meeting with local contractors, Govt officials, bank and local staff were hired to start the new branch office.

In 2007 when Abir noticed that he was not getting reports of the branch offices especially the sales turnover/ service provider emails and other staff related relations seems to have been isolated.

Abir then tried to find out the reasons and started to feel something fishy in the business transactions. He tried to see the company emails and proceedings with various vendors in branch offices located in different countries. He contacted the Accounts team and tried to gather some information. As per his study he found that there has been a large scale mass betrayal by his brother who happened to pocket the staff and misguide the vendors and service providers in impressing them that he was the owner and has full authority to open a branch office in different names that were subsidiary of IBSYS Canada.

Abir finds that his brother has betrayed him and all the background work he has been doing since few years and has blackmailed him and without his consent he has been diverting the sales and email traffic that was intended to be seen by Abir and approved. His brother has used hi technology to mask the IP addresses of the data centre servers and has been

using these servers for his own illegal company. Moreover the bills and claims pertaining to taxes from regional country offices and service providers have been forwarded to the parent company.

It has taken several years after the actual incidents happened to be discovered and also to give some time to observe the actual behavior and intentions of his brother. Also he has tried to come to a compromise with his mother and brother. However this was not effective. This is the reason a legal court proceeding had not been initiated till date.

All the above has brought in deep trouble and the president of the company has been betrayed, cheated and kept in dark for all the illegal activities that has been happening for many years.

In 2012 Abir plans to file for a Fraud investigation, court appeal for an inquiry leading to a trial and imparting justice. All the related email transactions, company papers, the mode of cheating and related evidences is being organized and will be handed to officials for further analysis, investigation and trials. Abir also has requested for an immediate freeze and arrest in this case of conspiracy by the related authority. Abir wants the bill claims from vendors to be prevented and Canadian Govt. needs to provide an official for looking into this and also possibly handle the case on his behalf. Abir has agreed to provide full cooperation in providing the evidences, history of transactions and will submit the necessary data and proofs to the officials to initiate the arrest and issuing court notice to his brother and also help in the court trials and fraud investigation.

Company background

Following sections will provide an overview of the company formation in year 2003 headquartered in Toronto, Canada and subsequent new branch offices at several overseas locations in different countries. The sections will highlight the key points of issue and irregularities that have been in place and running illegal businesses without the permission of the President of the company. The information provided here is based on the narrative description of the plaintiff Mr Abir and also as per the records available with the company.

Head Office - IBSYS Canada

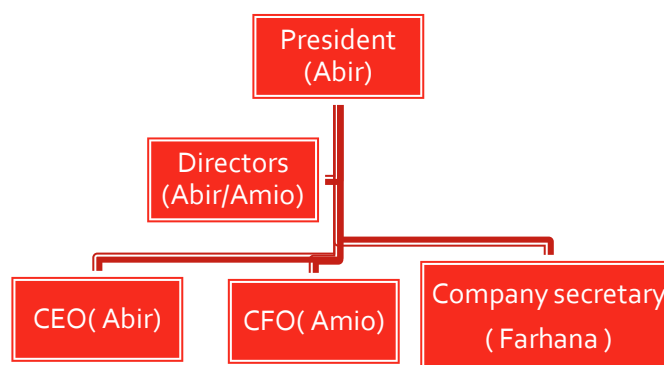
IBSYS Canada Inc is a private company categorized under Data Communication Services and located in Toronto, ON, Canada. Our records show it was established in 2003. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Headquarter Office address:

Ibsys Canada Inc

1 Yonge St Suite 1801

Toronto, ON M5E 1W7, Canada



IBSYS Canada Inc Business Information

Location Type	Single Location/ Head quarter
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Annual Sales (Estimated)	\$1,089,920
Employees (Estimated)	14
SIC Code	4899, Communications Services, NEC
NAICS Code	517919,
Products, Services and Brands	Information not found
State of Incorporation	Information not found
Years in Business	8

Source of information: <http://www.manta.com/ic/mt6kqql/ca/ibsys-canada-inc>

IBSYSY Company server's hosting details

IBSYS Canada uses the Hosting platform of Peer1 Company for its Telco operations.

151 Front Street Toronto, ON M5J 2N1, Canada

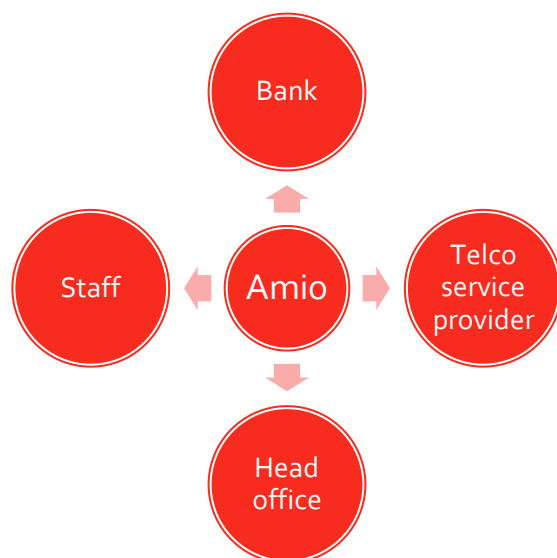
Hosting service provider details:

Source of information:
<http://www.peer1.com/infrastructure/datacenter-toronto>

Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links
IBSYS USA Inc <i>Operating in Canada:</i> 117 Mc Clure Crescent, Scarborough, M1P2N1, Canada	Amio	Amio signed for this company and has false financial reporting

Canada Relationships:



Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Canada Service provider details

Service Provider	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
Hosting provider – Peer 1 1000-555 West Hastings street Vancouver	Arlene Collett Collections Officer Ph: 6049096426 acollect@peer1.com	Credit card related	

BC, Canada www.peer1.com			
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Canada specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken
FINTRAC Canada	Govt Official that will initiate investigation	Lodging report details at: http://www.fintrac.gc.ca/reporting-declaration/1-eng.asp F2F Reporting F2R Web reporting Providing Volunteer Info Reporting proc

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

Canada specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondance / Attachements

Branch Office - IBSYS USA

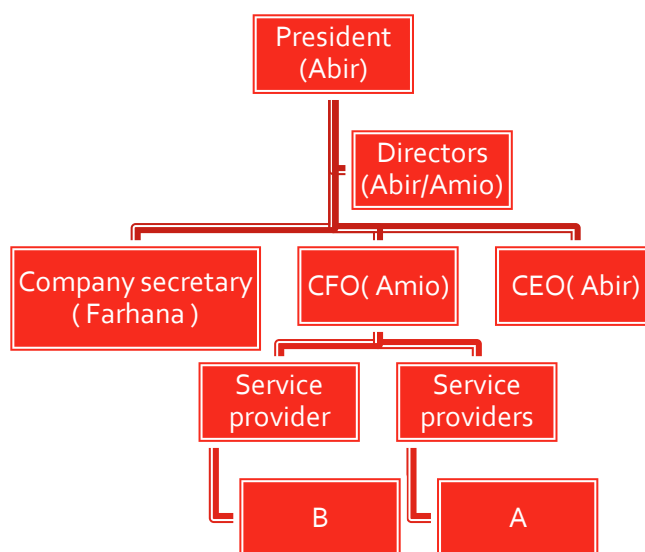
IBSYS USA Inc is a private company categorized under Data Communication Services and located in New York, USA. It is a 100% subsidiary branch office of IBSYS CANADA. Our records show it was established in 2009. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Branch office address:

Ibsys USA Inc

1 Yonge St Suite 1801

Toronto, ON M5E 1W7, Canada



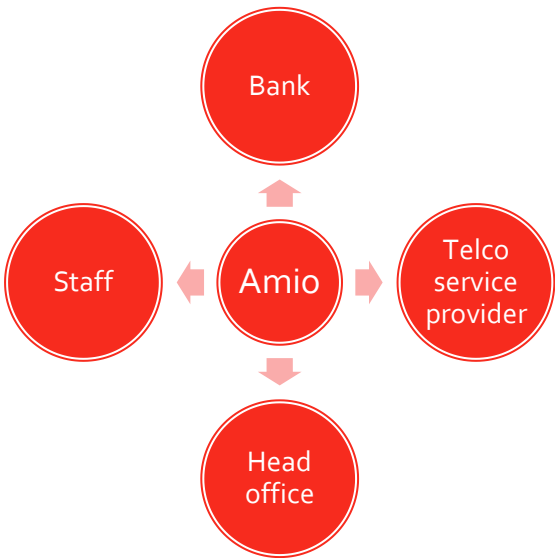
IBSYS USA Inc Business Information

Source of information:

Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links
Bansberry Pte Ltd http://www.bansberrysg.com/ 350 Ave Of Americas, Level 2, New York,NY 10019 USA Phone: + 1 646 862 0848 Email: sales@bansberrysg.com	Amio	Bansberry Pte Ltd is a company that has been developed with the investments and profits of its parent company IBSYS Canada. This is illegally operating and not accounted by IBSYS Canada. However the emails show there is relation.

USA Relationships:



From above please show how the CFO (Amio) managed the relations and what are the issues with each of these

Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Relation B

Parties Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

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USA Service provider details

Service Provider / Details	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken/ to be taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
GoDaddy, Domain registration and Hosting / 9 facilities, including Arizona, Iowa, California, Colorado, Washington, D.C., and India , Your Customer Number: 28126869	<u>Live 24/7 Sales & Support (480) 505-8877</u> Billing Questions? <u>(480) 505-8855</u>	Claims? Certified Domain Renewal - 1 Year 5/9/2011 Billing for 04/19/2011. <u>bansberry.com</u> Business Registration Renewal CANCELLED Business Registration for <u>INBUSCON.COM</u> for 04/09/2011. Complaint: <u>https://support.godaddy.com/support/?ci=50949&isc=gdbba72965</u> <u>https://supportcenter.godaddy.com/Abuse/SpamReport.aspx?isc=gdbba72965&ci=22420</u>	Illegal business to be reported to GoDaddy ??? <u>GoDaddy Notice</u>
Standard Chartered Bank			

USA specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

USA specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondance / Attachements
GoDaddy,	bansberry.com	USA\Correspondance.xlsx
http://www.stopfraud.gov/report.html	Need to submit report	USA\Correspondance.xlsx
https://tips.fbi.gov/	Need to submit report	USA\Correspondance.xlsx

Branch Office - IBSYS BANGALDESH

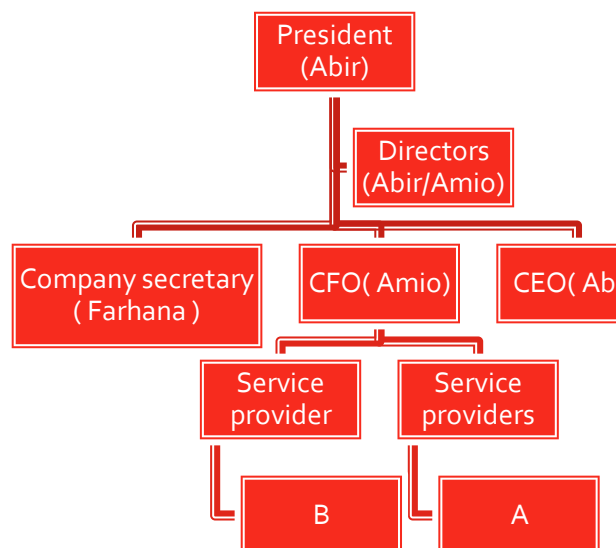
IBSYS Bangladesh Inc is a private company categorized under Data Communication Services and located in Dhaka, Bangladesh. It is a 100% subsidiary branch office of IBSYS CANADA. Our records show it was established in 2007. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Branch office address:

Ibsys USA Inc

1 Yonge St Suite 1801

Toronto, ON M5E 1W7, Canada



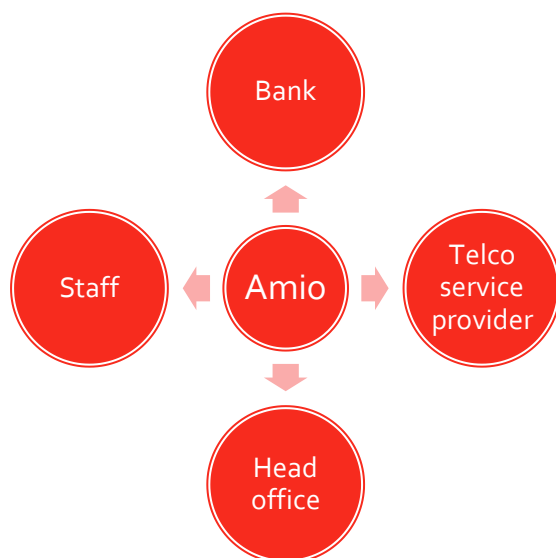
IBSYS Bangladesh Inc Business Information

Source of information:

Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links
Integrated Business Systems and Solutions PVT Ltd, (IBSS) Dhaka	Amoi	
Integrated Business Communication Network solutions (IBCNS), Dhaka	Mashfiq H Chowdhury Amio* Chairman* *Phone* : +880 2 913 5041 *Mobile* :+880 172 093 6201 *Fax* : +880 2 912 2765 *E-Mail* : mashfiq@ibcns.com	

Bangladesh Relationships:



From above please show how the CFO (Amio) managed the relations and what are the issues with each of these

Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links
Amio related to Novotel, BTCL and Banla Track	Amio along with some staff of these companies did fraud and helped each other in getting contracts by paying bribes and doing illegal work that is prohibited by BRTC, so through investigation has to be done	Cal detail reports (CDR) will be provided to wwatveer we have with us when Amio was working for IBSS and IBCNS period of 2004 – 2009, later Amio closed these companies to invest in another new companies to avoid penalties of illegal trade.

Relation B

Parties Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Bangladesh Service provider details

Service Provider	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
SingTel Bangladesh 15th Floor - South Block, Bay's 50 Mohakhali, 50 Mohakhali Commercial Area, Dhaka - 1212, Bangladesh	Kazi Hafiz Al Hassan Country in Charge - SingTel Bangladesh T: +880 28835120 F: +880 29880037 M: +880 1730303055	Bills due to SingTel about 32,000 of which only 4,500 has been submitted by Amio and rest of the bills are still unsettled	Amio states on August 17, 2011 that he left IBSYS CANADA one year back
Bharti Airtel	Nitin Kaushal Head - Asia Pacific Global Data Business Bharti Airtel Singapore Pte. Ltd. # 02-01, One Fullerton, 1 Fullerton Road, Singapore - 049213. Hand Phone: + 65-9270-4270 Tel : +65-6832-5192, Fax: +65-6408-3801. Email: *nitin.kaushal@airtel.in* <nitin.kaushal@airtel.in>.		
Standard Chartered bank	<u>Md Harun Rashid</u> Manager - Loan Operations Consumer Operations Standard Chartered Bank Phone: +880 2 8833003-4 (Ext - 4614) Mobile: + 880 1 713082241 Fax: +880 2 9890723	Statement of accounts done by Amio during period 2009 needs to be obtained as proof of issue and suspected fraudulent transactions done	

	Address: Level -4, SCB House, 67 Gulshan Avenue, Gulshan, Dhaka, Bangladesh		
NOVOTEL		AMio doing business with some employee inside trading for fraud	
Bangla Track		AMio doing business with some employee inside trading for fraud	
BTCL		AMio doing business with some employee inside trading for fraud	

Bangladesh specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken
BRTC Regulatory board for Telecom	Amio needs to be sued for the illegal Telecom services that he was conducting with the help of Tata Telco that were not legally allowed in Bangladesh	

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

Bangladesh specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondance / Attachements

http://www.exportbureau.com/fraud_report.html		

Branch Office - IBSYS MIDDLE EAST

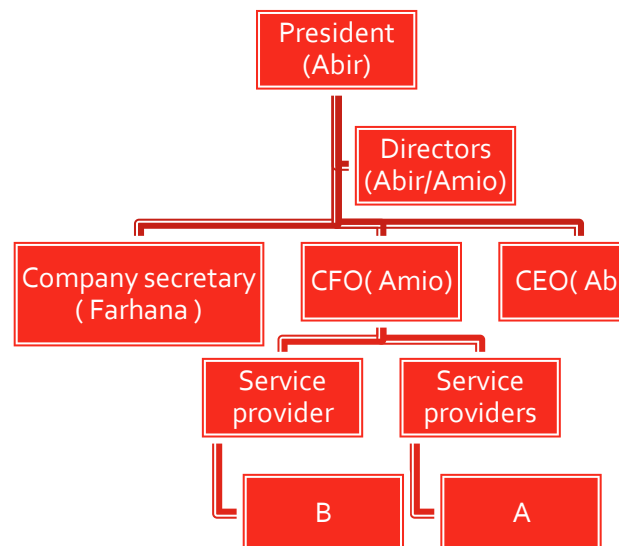
IBSYS Middle East Inc is a private company categorized under Data Communication Services and located in Saudi, . It is a 100% subsidiary branch office of IBSYS CANADA. Our records show it was established in 2007. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Branch office address:

Ibsys USA Inc

1 Yonge St Suite 1801

Toronto, ON M5E 1W7, Canada



IBSYS Middle east Inc Business Information

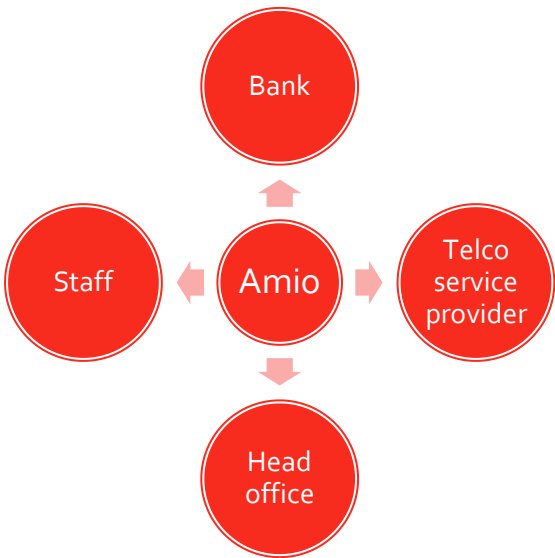
Source of information:

Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links
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Bansberry Pte Ltd	Amoi,	VoIP is a banned business in Dubai, however the rules have been violated by Amoi and he has misdirected the Govt and local authorities in selling the VoIP services by having dubious client overseas accounts.
IBCNS Ltd, Dubai	Amoi	

Middle East Relationships:



From above please show how the CFO (Amio) managed the relations and what are the issues with each of these

Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Relation B

Parties Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Middle east Service provider details

Service Provider	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
<p>OIL Company Formations and Services LLC Office No. 3, Mezzanine Floor Al Marooj Rotana Offices P.O. Box 117546 Sheikh Zayed Road Dubai, UAE</p> <p>Mobile: +971 50 143 2342 Tel: +971 4 307 3704 Fax: +971 4 321 5202</p>	<p>Michelle Angelique Armand Director, OIL Company Formations and Services LLC</p>		
<p>Standard Chartered Bank. Dubai,UAE</p>			<p>Email from : iBanking.UAE@sc.com</p> <p>Mr KHAN ISHRAQ AZIZ(Relationship No-206860966)/Account No: 01686096601 has transferred AED-500 to your account (IBSYS Canada) 01949573801 on 2012-03-26. The reference no for this transaction is 201203260001165</p>
<p>Standard Chartered Bank. Dubai,UAE</p>	<p>Deira Branch Enquiry No: 600522288</p>	<p>Credit card stmt for IBSYS account:</p>	<p>Amio has taken large money from here and</p>

Deira Branch		01****738 01 Showing large withdrawal balance of 216,419.07 UAE Dirhams as of 22 Apr 2010 stmt	has not settled the balance
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Middle East specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

Middle East specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondance / Attachments
eComplain	http://www.ecomplain.ae/Main.aspx http://www.ecomplain.ae/NewAccount.aspx	<u>MIDDLE EAST\Correspondance.xlsx</u>

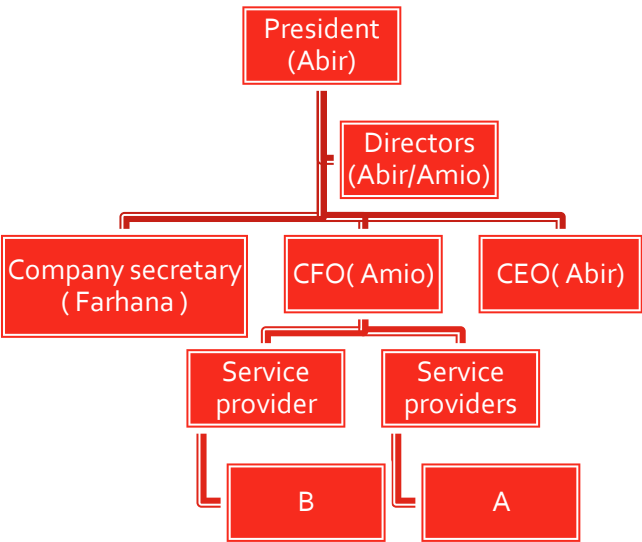
Branch Office - IBSYS INDIA

IBSYS India Inc is a private company categorized under Data Communication Services and located in New Delhi, . It is a 100% subsidiary branch office of IBSYS CANADA. Our records show it was established in 2007. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Branch office address:

Ibsys India Inc
1 Yonge St Suite 1801
Toronto, ON M5E 1W7, Canada

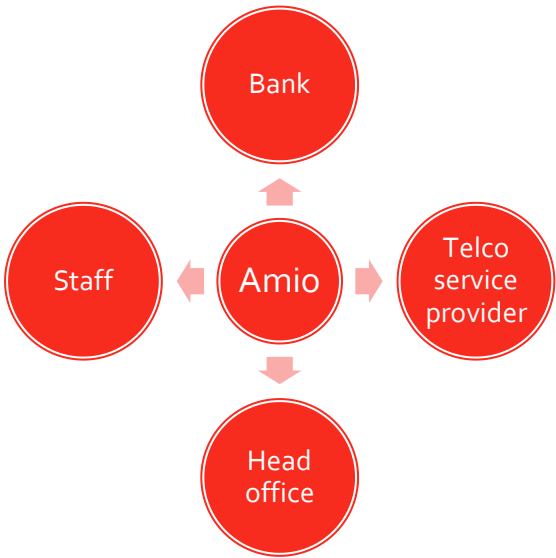
IBSYS India Inc Business Information



Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links

India Relationships:



From above please show how the CFO (Amio) managed the relations and what are the issues with each of these

Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Relation B

Parties Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

India Service provider details

Service Provider	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
TATA TELECOM:	Mr. Rajan Vohra – 2006		

India specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

India specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondence / Attachements

IBSYS- Branch Office Singapore

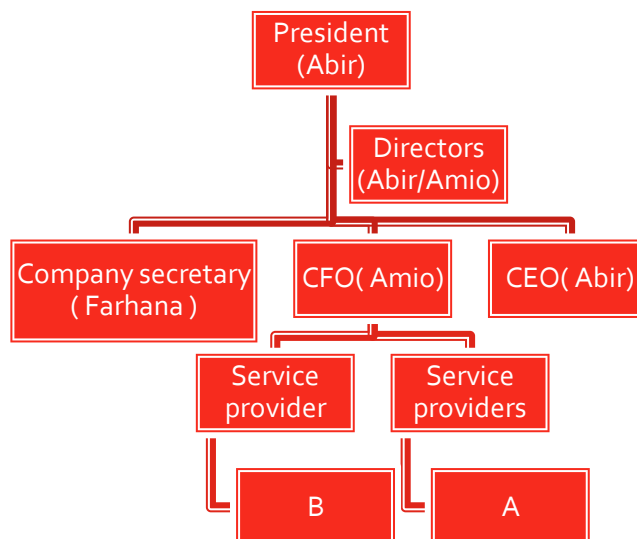
IBSYS Singapore Inc is a private company categorized under Data Communication Services and located in New Delhi, . It is a 100% subsidiary branch office of IBSYS CANADA. Our records show it was established in 2007. Current estimates show this company has annual revenue of \$1,089,920 and employs a staff of approximately 14.

Branch office address:

Ibsys India Inc

1 Yonge St Suite 1801

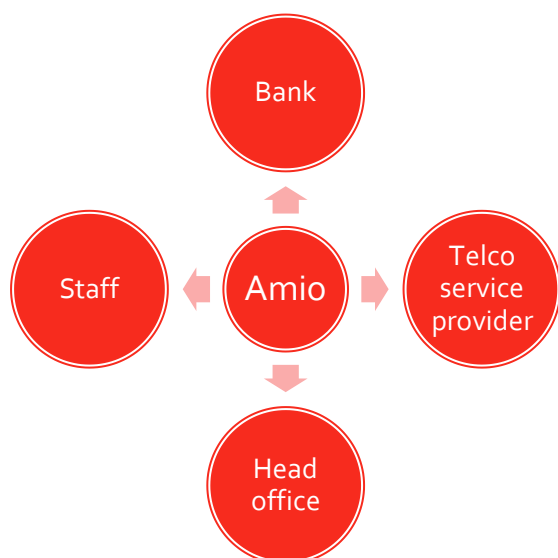
Toronto, ON M5E 1W7, Canada



Illegal / Unreported Companies

Illegal company	Who are involved	Suspected Fraudulent details: Please use Email references / Pictures to show the links
http://www.bansberrysg.com 14 Robinson Road, #13-00 Far East Finance Building Singapore 048545 Phone : + 65 6690 7733 Email: sales@bansberrysg.com	Amio	Bansberry Pte Ltd is a company that has been developed with the investments and profits of its parent company IBSYS Canada. This is illegally operating and not accounted by IBSYS Canada. However the emails show there is relation.

Singapore Relationships:



From above please show how the CFO (Amio) managed the relations and what are the issues with each of these

Relation A

Parties / Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Relation B

Parties Service providers involved in this relation	Who are the culprits	Suspected Fraudulent details: Please use Email references / Pictures to show the links

Singapore Service provider details

Service Provider	Contact person / earlier contact signed off between the parties	Any claims pending as of date / Actions taken:	Suspected Fraudulent details: Please use Email references / Pictures to show the links
Offshore Incorporations Pte. Limited 80 Raffles Place #16-20 UOB Plaza 2	Iris Lee Assistant Manager, Customer Services	Reservation for BANSBERRY PTE. LTD. will expire tomorrow, 16 October	

Singapore 048624 Tel: (65) 6438 0838 Fax : (65) 6438 2023		2008.	
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Singapore specific fraud investigation agency details

Witness and their contact details

Witness Name	Relation to IBYSYS company	What evidence is provided

Govt Officials / Pvt agencies investigation authorities

Official/ Agency Name	Relation to IBYSYS company	What investigation service is provided / can be taken

Local and International Court specific petitions/ Legal clause, provisions

Court type and Lawyer details	Legal petition details	What clause/ provisions / evidences are going to be used to sue the defendant

Singapore specific correspondence details

Agency and contact person details	Correspondance topic / reference to earlier or intended actions	Details of correspondance / Attachements
http://www.iras.gov.sg/irashome/default.aspx	http://www.bansberrysg.com 14 Robinson Road, #13-00 Far East Finance Building Singapore 048545 Phone : + 65 6690 7733 Email: sales@bansberrysg.com	SINGAPORE\Correspondance.xls x

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Plaintiff's claim

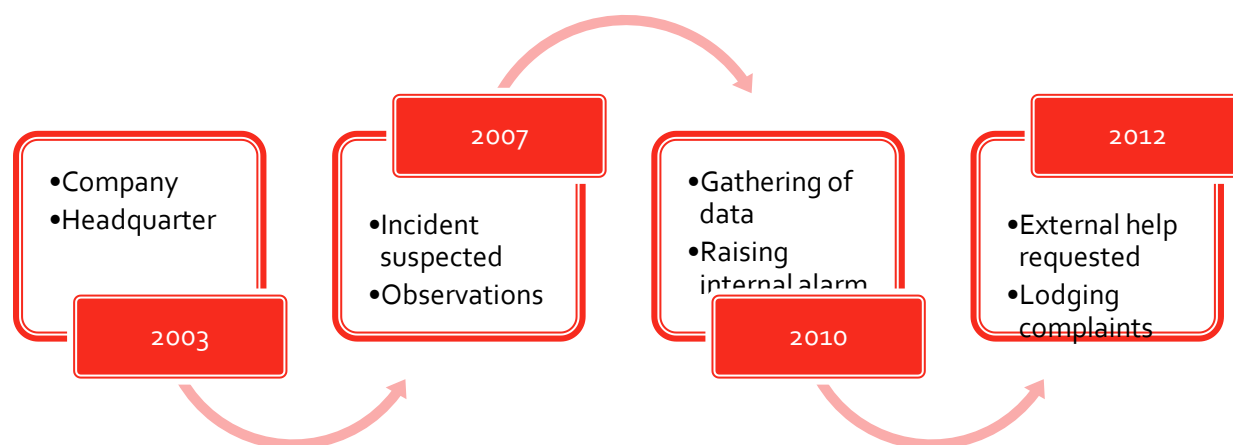
Mr Abir has been facing extreme trouble and hardship in managing the business and having control over the staff and his brother's suspicious activities that might be criminal in nature.

There were earlier attempts by his own family members of assault and informing police about him. Mr Abir has been also been in trauma and mental stress that has been caused due to the irregularities in financial reporting, accounts keeping and has betrayed him to the maximum extent causing loss and damage to his employment, personal life and also to the society he lives in large.

Mr Abir claims that his brother has been diverting the profits to create new business and not reporting the business transactions on a regular basis. Several messages and reminders have been sent across to his brother Amio but there has been no improvement and it has been going to worse.

Mr Abir claims that ONLY the branch office expenses are diverted to his Head offices for claims and NOT the profits or sales that have happened. It is estimated that the local branch offices have been doing good profits and all these have been hidden from the reports and the president has been mis directed as to the where about of the earned money that has been diverted into various Bank accounts (E.X Std Char bank of Singapore) and also Abir claims that Mr Amio has hi level contacts with local authorities and banks and always been providing forged signatures of president without his consent.

Milestones - Major incidents



2003: Brief about the chronological order of events

2007:

What was the issue – Suspected Activity?

Who were involved?

What is the impact – Monetary, Sales

Which location and Govt / Agencies involved

2010:

What was the issue – Suspected Activity?

Who were involved?

What is the impact – Monetary, Sales

Which location and Govt / Agencies involved

2012:

What was the issue – Suspected Activity?

Who were involved?

What is the impact – Monetary, Sales

Which location and Govt / Agencies involved

Court/ Law related details

An Appeal in the Provincial /Federal Court of Canada is to be made and the below data can be used for filing the appeal

APPLICATION

1. The applicant makes application for: *(State here the precise relief claimed.)*

I, Mr Abir Choudhary, President/CEO of company hereby pray for settling the damages, monetary and business clients, reputation leading to significant mental stress and agony created by my business partner Mr Amoi Choudhary who has betrayed me in the partnership agreement and who has been actively engaged in fraudulent activities that have possible criminal links across the international borders. I request you to conduct a thorough investigation and trials into the series of cheating, theft and losses done to my company in my absence and without proper notice to me.

2. The grounds for the application are: *(Specify the grounds to be argued, including a reference to any statutory provision or rule to be relied on.)*

Fraud-

- *Administrative/regulatory fraud*
- *Criminal fraud*
- *Financial record keeping*

Offences –

- *Criminal breach of trust.*
- *Destroying documents of title.*
- *Forgery.*
- *Uttering forged documents.*
- *False/Altered Document*
- *Organized Crime*
- *Money laundering and terrorist financing*
- *Disposal of property to defraud creditors.*
- *Corporate liability*
- *Cross- border cooperation*

3. The following documentary evidence will be used at the hearing of the application: *(List the affidavits or other documentary evidence to be relied on.)*
Evidences:

- *Business ownership documents*
- *Partnership terms and agreement – Local and international agreements*
- *Business Transactional trail records for period 2007- 2011*
- *Forged emails transactions conducted by the culprit*
- *Official letters with Banks, stakeholders, accountants*
- *Office records of Canadian head office and branch offices at USA, Dubai, Bangladesh, Singapore and Middle east(Qatar, Saudi Arabia, Dubai)*

(Where the notice of application is to be served outside Ontario without a court order, state the facts and the specific provisions of Rule 17 relied on in support of such service.)

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Additional company details

Registration –

Auditor's reports

Annual budget/ filings/ Tax returns

Other partner details

Evidences and proofs handlers

Statement of Cash flows

Current court orders/ hearing / claims from service providers

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