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**AIVFA Supplementary Submission:**  
**New Documentary Disclosures**  
**dating from February 11, 2009**

**Commission of Inquiry into the  
Investigation of the Bombing of Air India  
Flight 182**

**March 25, 2009**

**Ottawa, ON**

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Joint Counsel to Air India Victims Families Association (AIVFA)



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Joint Counsel to Air India Victims Families Association (AIVFA)

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## Introduction

1. The Commission of Inquiry into the Investigation of the Bombing of Air India Flight 182 granted an opportunity for Parties to provide the Commission with final submissions responding to the different Terms of Reference of the Inquiry. The Air India Victims Families Association (AIVFA) submitted its final submissions on February 29, 2008.
2. Subsequent to the delivery by AIVFA of its final submissions and the close of public hearings, the Commission produced new documentary disclosures to counsel for the families, starting in October 2008, through to and including, December 1, 2008.
3. On December 12, 2008, AIVFA submitted its supplementary submissions with respect to these new documentary disclosures. On January 7, 2009, AIVFA submitted supplementary reply submissions to the response by the Attorney General of Canada concerning these new documentary disclosures.
4. On February 11, 2009, and March 16, 2009, the Commission produced additional new documentary disclosures to counsel for the families. Unfortunately, like so many other documents disclosed during this Inquiry, many of them contained significant redactions.
5. As noted in previous written submissions, AIVFA regrets that these new voluminous documentary disclosures were not disclosed to counsel during the public proceedings of the Inquiry, so that counsel could have cross-examined witnesses or made oral and/or written submissions on their contents. AIVFA submits that having an opportunity to cross-examine relevant witnesses concerning the contents of these new documentary disclosures would have yielded far greater insight and value to the important work of the Commission.
6. AIVFA takes this opportunity to provide the following written submissions with respect to the new documentary disclosures of February 11, 2009.

## Pre-Bombing

### **The Threat of Civil Aviation Bombings was Known**

7. At paragraph 33 of its supplementary written submissions of December 12, 2008, AIVFA notes that several new documentary disclosures reveal the extent to which concerns about aviation sabotage had overtaken concerns about hijacking, in addition to the great extent to which bombings of aircrafts had occurred prior to the bombing of Air India Flight 182.
8. A new documentary disclosure from the Aviation Safety Network provides details with respect to two aviation-related bombings in 1955, with one involving an Air India plane aimed at harming Chinese Premier Zhou Enlai. The document notes that the probable cause was "An explosion of a timed internal machine placed in the starboard wheel of the aircraft. This explosion resulted in the puncturing of the no. 3 fuel tank and an uncontrollable fire" and subsequent crash of the airliner (Public Production # P-447).

9. In addition, the 1969 text of the International Civil Aviation Organization (ICAO) Resolution with respect to Unlawful Interference with International Civil and its Facilities, “urges all Contracting states to take all appropriate measures to prevent the occurrence of any acts of unlawful interference so as to assure continued safety in international civil aviation.” The Resolution defines “unlawful interference” as including “sabotage or armed attack directed against aircraft used in international air transport or ground facilities used by international air transport” (Public Production # P-449).
10. Another new documentary disclosure states that on June 26, 1985, Mr. Glen Gartshore of Canadian Security Intelligence Service (CSIS) Headquarters in Ottawa reported that a Royal Canadian Mounted Police (RCMP) detective in Richmond, British Columbia was investigating a CB broadcast. One particular broadcast stated that, “Tonight, tonight, VIA. Tonight, we are going to bomb” (Public Production # CAB-0360). Although Mr. Gartshore reported this incident on June 26, 1985, AIVFA asks whether this broadcast was heard prior to the Air India Flight 182 bombing? Further, AIVFA would like to know what follow-up did the RCMP do with respect to this particular broadcast and others like it, in and around the time of the bombing?
11. AIVFA submits that this evidence further substantiates the fact that the threat posed by terrorist-related bombing of airplanes was known prior to the Air India Flight 182 bombing in 1985. AIVFA reiterates the question it posed at paragraph 38 of its supplementary written submissions of December 12, 2008: Why did it take the government (Transport Canada) so long to act with respect to changes to aeronautic regulations to address the more serious concern posed by sabotage/bombings as compared to hijackings?

### **Intelligence Tasking Failure**

12. At page 66 of its final submissions, AIVFA argues that, “The failure to prevent the Air India Flight 182 bombing stemmed, in part, from the failure of the government to place a high priority on issues related to Sikh terrorism and to devote sufficient resources to following the increasing threat posed by Sikh terrorists living in Canada.”
13. A new documentary disclosure reiterates the concerns that Mr. Russell Upton expressed in his testimony before the Air India Inquiry with respect to a lack of resources for CSIS to monitor the threat posed by Sikh terrorism. According to Mr. Upton in a CSIS personnel interview he gave, “The Far East section was allotted four analysts positions and a section head. In 1985 two of the analysts positions were vacant...UPTON’s section was seriously understaffed and BURGOYNE was a new analyst just learning the job. UPTON also stated that the switch from the R.C.M.P to C.S.I.S. and the ensuing change in policy created problems” (Public Production # CAD-0003).
14. AIVFA submits that the Air India Flight 182 bombing was a product of an intelligence tasking failure, which was exacerbated by an overall intelligence cycle failure. AIVFA reiterates its conclusions stated at page 80 of its final submissions: “With all of these separate parts of the intelligence cycle being interdependent, a failure in one led to a

failure in another, ultimately leading to the culmination of a massive threat to the safety and security of those Canadians aboard Air India Flight 182.”

### **Deficient Civil Aviation Security**

15. At page 135 of its final submissions, AIVFA stated that, “In 1985, Canada was not ready for aviation-based terrorism in the form of the Air India Flight 182 bombing.”
16. In addition to the evidence AIVFA provided in its final submissions with respect to deficient civil aviation security, and the evidence AIVFA noted in its supplementary written submissions of December 12, 2008, new documentary disclosures further substantiate the deplorable state of civil aviation security in Canada prior to the Air India Flight 182 bombing. According to a secret Report on a National Counter-Terrorism Program, “In the early 70’s, Transport Canada and the air carriers implemented security measures at airports in Canada to safeguard civil aviation against acts of unlawful interference. The measures are considered to be adequate to prevent or deter hijackings but are not adequate to prevent the introduction of explosives or incendiary devices in checked baggage, cargo, mail and stores to be carried on board aircraft.” (Public Production #4441).
17. Likewise, a new 1981 National Civil Aviation Security Committee document points out that, “Security arrangements at cargo facilities are generally weak. Employees working in the area are reluctant to challenge strangers in an effort to prevent unauthorized access to parked aircraft as well as to the cargo shipments” (Public Production #4434).
18. Moreover, a damning July 25, 1985 internal audit report by Transport Canada of Vancouver, Pearson and Mirabel airports, reveals numerous and significant security gaps at these airports (we understand that this audit was conducted for the purpose of understanding the nature of the gaps, if any, in airport security prior to the bombing of Air India Flight 182):

#### Vancouver International Airport:

- “Many vehicle and foot gates are left open and unguarded during all hours of the day and night. RCMP patrols have identified this security problem on numerous occasion but the problem still exists”.
- “No motivational/security training has been conducted at VIA for airport staff”.
- “The monitoring of RCMP activities is being carried out occasionally by Airport Security and Airport operations staffs. However, no formalized procedures have been issued by the Airport General Manager for the day-to-day monitoring of airport security measures.”

- “The testing of security/emergency plans and the monitoring of security procedures were formally carried out in June 1985. The previous exercise was four or five years ago”.
- “...two of the three X-ray machines used to screen luggage were designed for hand luggage thus the ability to adequately screen luggage which is normally larger and bulkier is questionable”.

#### Pearson International Airport

- “Also, during a recent bomb threat, it was reported that the RCMP took fifteen (15) minutes to notify Peel Regional Police that a bomb disposal team might be required. A dog and dog master unit were not available and although the recently acquired “mechanical sniffer” was used, confusion existed regarding the interpretation of the readings provided by the device”.
- “A personnel pass identification system is in effect at PIA but there are several thousand passes which cannot be accounted for since they have been either lost, stolen or not returned by the recipients”.
- “The perimeter fencing surrounding PIA does not meet CATA standards”.
- “Regulatory reviews of carrier security measures are sporadic and do not include a follow-up mechanism”.

#### Mirabel International Airport:

- “Security surveys and quality reviews with Headquarters and Regional guidance are not conducted on an annual basis to identify and address weaknesses in the total security program”.
- “security plans are emergency procedures are not updated annually;”
- “control in the recovery and destruction of airport passes is not effective;”
- “there is no bomb disposal site at Mirabel; and”
- “an integrated monitoring framework has not been developed to ensure coordinated and complete review of security applications and measures at Mirabel”.

19. At paragraphs 15 to 17 of its supplementary written submissions of December 12, 2008, AIVFA reviews evidence of deficient civil aviation monitoring by Transport Canada due to a lack of resources.

20. In a new documentary disclosure, where Commission counsel requests further information from the Government of Canada based on the final submissions of the Attorney General of Canada (Volume II of III), with respect to measures to be implemented as a result of the recommendations in *Flight Plan* and Transport Canada's and CATSA's action plans for implementation of these recommendations, it is revealed that "11 recommendations will be completed with the regulatory review and when funding is approved for security improvements" (Public Production # 4409).
21. AIVFA submits that deficient civil aviation security prior to the bombing of Air India Flight 182 was appalling given that the threat of sabotage related bombings at the time was well known and documented.
22. AIVFA further submits that it hopes that the 11 unimplemented recommendations stemming from the recommendations outlined in *Flight Plan*, that are currently awaiting funding approval, get appropriate funding and implemented so as to prevent any future civil aviation incident from happening. The regulatory changes with respect to passenger-baggage reconciliation vis-à-vis the *Aeronautics Act* were not implemented until shortly after the bombing of Air India Flight 182, and as a result were unable to serve as a measure that could have possibly prevented the bombing.

### Post-Bombing

#### **CSIS Tape Destruction**

23. At page 103 of its final submissions, AIVFA states that, "Upon assuming their responsibilities at CSIS, monitors, transcribers, and translators testified about not receiving instructions and policy briefings with respect to what to look for on intercepts, what material to retain from the tapes, and who was to make the decision to retain a tape."
24. A new documentary disclosure reiterates the confusion that existed among CSIS employees with respect to tape retention from CSIS wiretaps, which ultimately resulted in the destruction of the Parmar tapes. According to this disclosure:
  - Mr. Gartshore, head of the Europe/Pacific Rim Counter-Terrorism Desk at CSIS was not familiar with CSIS policy regarding the retention of tapes.
  - Mr. Laking, Deputy Chief of Communications Intelligence Production in Ottawa recalled that he usually tried to retain out of town tapes for 90 days but that he had no written documentation on this policy.
  - Mr. Kobzey, an investigator at CSIS, understood that all tapes were kept in secure storage for further review by the investigator and if the investigator had no further need for the tape it was erased and reused.

- Mr. Deschenes, former Head of Counter-Terrorism at CSIS, recalled that in 1985 there was a ministerial directive that stated that tapes had to be destroyed within 30 days.
  - Mr. Jodin, former Director General, Communication Intelligence and Warrants at CSIS, sent out a memo advising that tapes be maintained for one year.
  - Mr. Claxton, Head of CSIS in British Columbia, stated that he did not have the authority to order the retention of tapes and would have had to obtain the authority from CSIS Headquarters but he never received any direct request to retain all CSIS tapes from the Parmar intercepts (Public Production # CAD-0003).
25. AIVFA submits that unfortunately no instruction or policy briefings were given with respect to tape retention in order to eliminate the confusion among CSIS employees at the time before or immediately after the Air India Flight 182 bombing. No CSIS specific documentation or manuals had been created, and access to the only available documented assistance, the RCMP Security Service's TAPP Manual, was on a need-to-know basis. Moreover, even in light of the investigation into the Air India Flight 182 bombing, Canada's biggest mass murder investigation ever, nothing was done or no instructions were issued to address the issue of the retention of relevant tapes to the investigation.

#### **Air India Investigation Challenges:**

26. At page 100 of its final submissions, AIVFA argues that, "In the haste to create CSIS, the government's focus was on passing legislation and overlooked were the significant resource, policy, and operational challenges that would have to be met in order to make the relationship between CSIS and the RCMP fully functional."
27. Several new documentary disclosures highlight the strained relationship between both agencies:
- According to a statement from Mr. Barr, "When CSIS was created, the RCMP continued to resist the new division of policing and intelligence duties" (Public Production # P-437).
  - "There are apparently varying degrees of cooperation depending upon the region and the RCMP section involved..." (Public Production # CAB-0495)
  - According to a document authored by Mr. Barr, "Both D/Commr. Inkster and I are fully aware that we have a possible personality conflict between our two liaison officers..." (Public Production # CAA-0526).
  - According to a document authored by Mr. Barr, "For the Service, there is the suggestion that we have not been cooperating with the RCMP on matters related to terrorism. This is simply not true... We do not need a liaison officer to ensure



that we [CSIS] do our job correctly...Somehow I feel that the liaison officer decision was taken in haste..." (Public Production # CAA-0492).

28. In addition, several new documentary disclosures also reiterate the degree of difficulty the RCMP experienced in gaining access to useful evidence from CSIS to assist in the investigation and prosecution of the Air India Flight 182 bombing:
- An affidavit from Mr. Howard Walden of the B.C. RCMP states, "THAT I am further informed by Superintendent W.L. Holmes that the Canadian Security Intelligence Service refuses, on policy grounds, to release copies of the taped private communications they have intercepted, and have reserved to themselves the decision of what is relevant and what will be released to the Air India Task Force investigation" (Public Production # CAA-0324)
  - An RCMP memorandum states that, "The next reference is on July 23<sup>rd</sup>. 1985 wherein HOADLEY refers to difficulties that are being experienced by the Task Force in that they are only receiving generalities from C.S.I.S." This same document outlines periods of time after the bombing when access to CSIS transcripts and source notes by the RCMP was denied (Public Production # CAA-0379)
  - Another new documentary disclosure notes that in a telex dated July 23, 1985, "...great difficulty was being encountered in securing information with respect to CSIS – BC Operations because information supplied was general and greatly lacking in detail" (Public Production # CAA-1089).

29. AIVFA submits that the haste in which CSIS was established, created the conditions that served to frustrate relationships between the RCMP and CSIS, and effectively contributed to an inability to prevent the bombing of Air India Flight 182, in addition to hampering the investigation into the bombing and the eventual prosecution of those responsible for the crime.

### **Malkiat Singh Sidhu Incident**

30. Another new documentary disclosure with respect to a *Report on a Review of the Management of the Counter Terrorism Security Intelligence Process Related to the "Malkiat Singh Sidhu Incident" of May 25, 1986* (re the attempted assassination in Canada of a Minister of the Punjab government), confirms the problems that continued to plague CSIS in the aftermath of its creation, and the relationship between CSIS and the RCMP with respect to the sharing of information:
- "The response by the CSIS to allocating resources and direction to counter terrorism operations...supports the conclusion that inadequate resources had been allocated to Sikh operations in the B.C. region which led to accepting a time lag that proved to be too long."

- “training provided to translators, transcribers and intelligence officers newly assigned to Sikh operations essentially amounts to on-the-job assistance given on an as-needed basis by colleagues and supervisors...”
- “Views expressed by the intelligence officers in the B.C. region indicated that suspicion and distrust exist at the working level between these officials and their counterparts in the local RCMP...Most CSIS regions have reported problems relating to liaison with the RCMP, particularly where parallel investigations have been conducted.”
- “At this point it is essential that the CSIS have an operational manual which contains all the Service’s operational policies and procedures, complete and up-to-date. It is difficult to understand how the Service can operate effectively without such a manual.”
- “There is a need for much greater cooperation and joint planning between the CSIS and the RCMP as to how intelligence with respect to terrorism should be collected and treated” (Public Production # CAB-0647).

31. According to a statement by Mr. Archibald Barr provided in a new documentary disclosure, “The circumstances surrounding the attempted assassination of Malkiat Singh Sidhu by extremists from the International Sikh Youth Federation were very troubling. The shooting occurred on Sunday, May 25, 1986. Clear information about the pending attempt on his life was received the Friday before it happened, but it wasn’t passed on until the Monday following the attack. This was a case of negligence, if not ineptitude...Some action could have been taken, and it should have been taken. It was poorly handled and there was no excuse for not contacting Headquarters” (Public Production # P-437).
32. AIVFA submits that attempted assassination of Malkiat Singh Sidhu in the aftermath of the Air India Flight 182 bombing, substantiates the existence of significant resource, policy, and operational challenges that were overlooked in the haste to create CSIS, in addition to demonstrating that the problems plaguing CSIS and the relationship between it and the RCMP with respect to the sharing of information were not isolated to the Air India Flight 182 bombing and investigation.

**Cover-up to Diminish Compensation:**

33. At page 113 of its final submissions, AIVFA submitted that “AIVFA family members and all other family members of the victims of the bombing were prejudiced in their civil actions against the government by not having the information that a SIRC Inquiry would have produced.”
34. Two new documentary disclosures provide additional evidence of this disadvantage the families experienced in their pursuit of fair and just compensation in the aftermath of the bombing of Air India Flight 182. The first document is a report prepared for” Department of Justice Counsel Assessing Potential for Litigation”. In this Transport Canada Internal

Audit Branch Audit Report, security gaps at Vancouver International Airport, Pearson International Airport, and Mirabel International Airport, are outlined in detail (see paragraph 18 of this submission).

35. AIVFA submits that it is clear that in the aftermath of the Air India Flight 182 bombing, the Government of Canada was preparing to defend itself against potential litigation and knew that the major Canadian airports involved in the Air India tragedy had widespread security gaps. AIVFA asks why families of the victims did not have access to this information when they settled with the Canadian government on the issue of compensation in the aftermath of the bombing? Presumably, had this information been available to families of the victims, negotiations with respect to compensation in the aftermath of the bombing would have been quite different; enabling the families of the victims to have a better appreciation of the gaps in civil aviation security at these three airports, and inherent risks to the traveling public.
36. The second document, even more specific to the families of the victims, concerns the strategy with respect to the representation of Canada at the India Judicial Inquiry (otherwise known as the Kirpal Inquiry) into the bombing of Air India Flight 182. In this document, we learn that the Canadian Aviation Safety Board (CASB) wrote a report for the Kirpal Inquiry following the bombing, which concluded that the accident was the result of an explosion in the forward cargo compartment as a result of a bomb placed in interlined luggage. However, “The Department of Justice lawyer (Ivan Whitehall) felt very strongly that the report should not go forward until he had a chance to review it and that it could not be presented to the Kirpal Inquiry if it had any information which was not in line with other facts being brought forward through the Canadian input into the Kirpal Inquiry...[and that] the decision taken at the PMO [Prime Minister’s Office] meeting was that the report itself may not be presented to Kirpal but that the author of the report would be put on the stand and his testimony could be entered as just another piece of testimony for Kirpal” (Public Production # 4334).
37. AIVFA submits that the government of Canada intended to suppress the CASB report, believing that its conclusions could be damaging to the case the government was trying to build with respect to the bombing, in addition to being potentially damaging to its reputation. It is surprising that this discussion took place recognizing that those officials intimate with the disaster, recognized almost immediately that it must have been a bomb that caused the crash of Air India Flight 182. Thus, if the events described above unfolded in the manner they did according to this document, then the Kirpal Inquiry would not have been capable of properly assessing the conclusions of the CASB with respect to its position on the cause of the crash of Air India Flight 182. AIVFA questions whether the CASB was ultimately prevented from presenting its full uncensored report to the Kirpal Inquiry?
38. AIVFA questions whether counsel for the families have received all documents prepared for the Department of Justice with respect to assessing the potential or preparing for litigation, specifically the “memorandum prepared by our legal branch which deals with the legal aspects of the problem”, which is noted on page 5 of the document entitled,

“Representation of Canada At Judicial Inquiry into Air India Flight 182 (Public Production #4334)?

39. AIVFA submits that it is deeply disappointing that only now, more than twenty years after the bombing, and after more than a year since the close of public hearings at the Inquiry, that counsel for the families have received such revealing documents. In addition, it is unfortunate that counsel for the families are unable to cross-examine witnesses on the contents of these significant documents. AIVFA further submits that the two documents provide further indication that in the aftermath of the bombing of Air India Flight 182, there was a cover-up to limit the release of information and in so doing, it ultimately served to limit the amount of financial compensation families of the victims would receive from the federal government.

#### **Duty to Warn:**

40. At page 150 of its final submissions, AIVFA recommends that the government of Canada consider implementing a National Aviation Security Advisory System for high-risk flights that would inform passenger of high-risk flights and the security measures being taken to reduce the security threats to these flights.
41. A new 1989 Transport Canada documentary disclosure states that, “...there may be unusual cases in which it will be necessary to advise a Canadian head of post as to information relating to threats to foreign flights affecting the travel plans of mission staff or their dependents” (Public Production #4436).
42. AIVFA questions whether a Canadian Head of Mission advised mission employees of a threat or threats against Air India in June 1985, in particular whether any mission employees were advised against flying on Air India Flight 182? Further, is this a policy that exists today, and are there circumstances where a Canadian Head of Mission is obliged to share a threat advisory more broadly with the travelling public?

#### **Terrorist Financing**

43. Several new documentary disclosures with respect to the Financial Transactions Reports Analysis Centre of Canada (FINTRAC) highlight gaps in the tools FINTRAC needs in order to thwart terrorist financing. According to FINTRAC, “Access to databases is an important issue for FINTRAC...But FINTRAC feels that more access to CSIS would be more than welcome and work is being done on that...FINTRAC feels that for the moment, the limitations are situated in the act because it is not a lack of goodwill that hinders the process. FINTRAC is not sure the act permits them to access international databases” (Public Production # P-442).
44. In a request for information from the Air India Inquiry with respect to whether there is a database of every terrorist financing case, and whether such a database would be a useful tool, FINTRAC replied that, “To FINTRAC’s knowledge there is no comprehensive database which includes all relevant TF [Terrorist Financing] information that would be of

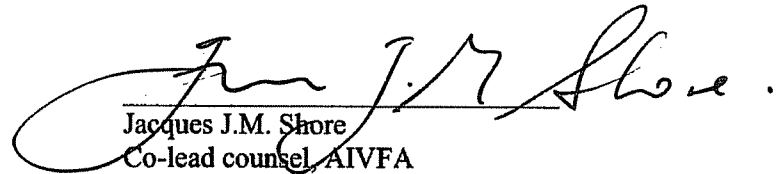
value to FINTRAC exercising its mandate. Any database that contained reliable information on all aspects of every terrorist activity financing case would be very helpful" (Public Production # P-440).

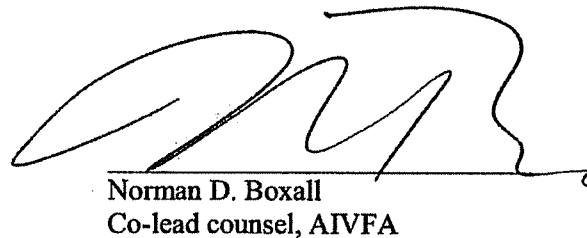
45. AIVFA submits that it hopes the government of Canada will address the above noted limitations in the legislation that governs FINTRAC so that it can access the necessary databases in order to fulfill its mandate of preventing the financing of terrorism, in addition to ensuring that FINTRAC has the databases and other tools it may need in order to effectively do its job.

**Conclusion**

46. AIVFA submits that the new documentary disclosures outlined in these submissions further substantiate and reinforce the conclusions drawn by AIVFA in its final submissions of February 29, 2008.
47. AIVFA appreciates the opportunity to provide the Commission with its submissions concerning the new documentary disclosures of February 11, 2009. AIVFA looks forward to the Commissioners' final report and recommendations.

ALL OF WHICH IS RESPECTFULLY SUBMITTED THIS 25th DAY OF MARCH, 2009.

  
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