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Navigant Consulting  
Funds Tracing Report  
Prepared for:

COMMISSION OF  
INQUIRY INTO  
CERTAIN  
ALLEGATIONS  
RESPECTING  
BUSINESS AND  
FINANCIAL DEALINGS  
BETWEEN KARLHEINZ  
SCHREIBER AND THE  
RIGHT HONOURABLE  
BRIAN MULRONEY

April 29, 2009

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**COMMISSION OF INQUIRY INTO  
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BRIAN MULRONEY**

**Funds Tracing**

**CONTENTS**

1.0	INTRODUCTION.....	1
1.1	Inquiry Mandate .....	1
1.2	Retainer of Navigant Consulting.....	2
1.3	Scope of this Report & Restriction on Its Use .....	2
1.4	Statement of Qualifications.....	2
2.0	SCOPE OF REVIEW.....	3
3.0	BACKGROUND .....	4
3.1	Bank Accounts of Interest.....	4
4.0	SUMMARY OF FINDINGS .....	6
5.0	ACCOUNT #46341.5 "BRITAN" .....	9
5.1	Summary of Findings re: BRITAN Account .....	9
5.2	BRITAN Account Activity Compared to Alleged Meeting Dates.....	10
6.0	ACCOUNT #41391.0 "FRANKFURT" .....	12
6.1	Summary of Findings re: FRANKFURT Account.....	13
6.2	FRANKFURT Account Sources of Funds.....	16
6.3	FRANKFURT Account Use of Funds.....	20

---

7.0	ACCOUNT #18679.4 .....	25
7.1	Summary of Findings re: Account #18679.4.....	25
7.2	Account #18679.4 Source of Funds .....	27
7.3	Account #18679.4 Use of Funds .....	30
8.0	IAL ACCOUNT #235.972.037 .....	34
8.1	Summary of Findings re: Account #235.972.037.....	34
8.2	IAL Account #235.972.037 Source of Funds .....	34
8.3	IAL Account #235.972.037 Use of Funds .....	35
9.0	ACCOUNT #18679.1 .....	37
9.1	Summary of Findings re: Account #18679.1.....	37
9.2	Account #18679.1 Source of Funds .....	37
9.3	Account #18679.1 Use of Funds .....	39
10.0	ACCOUNT #18679.0 .....	42
10.1	Summary of Findings re: Account #18679.0.....	42
10.2	Account #18679.0 Source of Funds .....	42
10.3	Account #18679.0 Use of Funds .....	43
11.0	ACCOUNT #18679.2 .....	44
11.1	Summary of Findings re: Account #18679.2.....	44
12.0	BITUCAN HOLDINGS LIMITED ACCOUNT #340-10.....	45
12.1	Source of Funds to Account #340-10 .....	45
12.2	Use of Funds From Account #340-10 .....	45
13.0	THYSSEN INDUSTRIES PAYMENTS TO IAL.....	46
13.1	Payments on December 30, 1987 – CDN\$1,900,000 .....	47
13.2	Payments on December 28, 1988 – CDN\$2,000,000 .....	47
13.3	Loan Payments - DM 1,466,000.....	48
14.0	AIRBUS INDUSTRIES PAYMENTS TO IAL .....	49

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**SCHEDULES**

***Swiss Bank Corporation, Zurich, "IAL" 18679 Account #46341.5 RUBRIK  
"BRITAN"***

1. Schedule of Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #46341.5 RUBRIK "BRITAN" for the Period July 1, 1993 to January 27, 1995

***Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 RUBRIK  
"FRANKFURT"***

2. Summary Schedule of Apparent Source and Use of Funds For Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" for the Period October 20, 1988 to March 31, 1994
3. Summary Schedule of Apparent Source and Use of Funds For Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" for the Period March 13, 1992 to July 28, 1993
4. Summary Schedule of Apparent Source and Use of Funds For Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" for the Period October 20, 1988 to January 22, 1990
5. Schedule of Account Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" for the Period October 24, 1988 to March 31, 1994
6. Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Compared to Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 for the Period October 13, 1988 to October 20, 1993
7. Schedule of Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Compared to Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 for the Period March 30, 1992 to May 13, 1993

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***Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4***

8. Schedule of Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 for the Period October 13, 1988 to October 20, 1993
9. Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 Compared to Withdrawals from Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 for the Period October 6, 1988 to June 21, 1991
10. Schedule of Known Withdrawal Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 for the Period October 6, 1988 to November 28, 1994

***Verwaltungs und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Ltd. (IAL) Account #235.972.037***

11. Summary of Apparent Source and Use of Funds for Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 for the Period October 3, 1988 to June 30, 1991
12. Schedule of Deposits to Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 from Banque Francaise du Commerce Extérieur, Paris for the Period October 3, 1988 to June 28, 1991
13. Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 for the Period October 3, 1988 to June 30, 1991

***Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.1***

14. Schedule of Known Account Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.1 for the Period October 14, 1986 to October 27, 1994

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**Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.0**

15. Schedule of Known Account Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.0 for the Period February 22, 1988 to November 5, 1993

**Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.2**

16. Schedule of Known Account Activity in Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.2 for the Period January 15, 1987 to October 4, 1994

**Summary Schedule**

17. Summary Schedule of Known Cash Withdrawals from Swiss Bank Corporation, Zurich, "IAL" 18679 Accounts #18679.0, #18679.1, #18679.2, #18679.4, #41391.0 "FRANKFURT", #46341.5 RUBRIK "BRITAN" for the Period October 4, 1987 to November 21, 1994

**CHARTS**

- A. Flow of Funds Related to CDN\$300,000 Cash Withdrawal from the "BRITAN" Account for the Period March 13, 1992 to November 21, 1994
- B. Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Summary of Account Activity for the Period October 24, 1988 to January 22, 1990
- C. Timeline of Certain Alleged Meetings Between Mr. Schreiber and Mr. Mulroney and the Source and Uses of Funds to the "BRITAN" Account for the Period June 3, 1993 to December 14, 1994
- D. Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Summary of Account Activity for the Period October 24, 1988 to December 30, 1993
- E. Comparison of Deposits into #41391.0 "FRANKFURT" to Deposits into Account #18679.4 for the Period March 26,

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1992 to May 13, 1993

- F. Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Summary of Account Activity for the Period March 30, 1992 and December 30, 1993
- G. Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 Apparent Sources and Uses of Funds for the Period October 6, 1988 to November 27, 1993
- H. I.A.L. International Aircraft Leasing Limited Thyssen Industries Flow of Funds for the Period December 30, 1987 to December 23, 1988

**APPENDICES**

- 1. Curriculum Vitae of Steven Whitla
- 2. Scope of Review
- 3. Documents Relied Upon (binders 1 and 2)

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# COMMISSION OF INQUIRY INTO CERTAIN ALLEGATIONS RESPECTING BUSINESS AND FINANCIAL DEALINGS BETWEEN KARLHEINZ SCHREIBER AND THE RIGHT HONOURABLE BRIAN MULRONEY

## Funds Tracing

### 1.0 INTRODUCTION

#### 1.1 Inquiry Mandate

On June 12, 2008, the Governor in Council issued an Order in Council setting out the Terms of Reference for the Oliphant Commission, formally named the Commission of Inquiry into Certain Allegations Respecting Business and Financial Dealings Between Karlheinz Schreiber and the Right Honourable Brian Mulroney ("The Commission"). The Honourable Jeffrey Oliphant, a Justice of the Court of Queen's Bench of Manitoba, has been appointed Commissioner under Part 1 of the Inquiries Act.

The terms of reference of the Commission include making inquiries about:

- The business and financial dealings between Mr. Schreiber and Mr. Mulroney;
- What payments, if any, were made by Mr. Schreiber to Mr. Mulroney and, if any were made, when and how and why they were made; and
- The source of the funds for any payments made.



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**1.2 Retainer of Navigant Consulting**

Navigant Consulting was retained by the Commission to assist the Commission in addressing the forensic accounting aspects of its mandate. Specifically, Navigant Consulting has been instructed to review, analyze and trace funds into and out of various bank accounts relating to the activities of Mr. Schreiber and, more particularly, tracing the source of funds for the payments Mr. Schreiber alleges he made to Mr. Mulroney in 1993 and 1994.

**1.3 Scope of this Report & Restriction on Its Use**

This report has been prepared solely for the use of the Commission. We do not assume any responsibility or liability for losses occasioned to any party as a result of the circulation, publication, reproduction or use of this report or the information it contains contrary to the provisions of this paragraph.

This report is based on the scope of review as described in Section 2.0.

**1.4 Statement of Qualifications**

Navigant Consulting is a firm of forensic accountants and business investigators with approximately 125 professionals located in Ottawa, Quebec City, Montreal and Toronto. Our professionals have many years of experience investigating thousands of business transactions in Canada and throughout the world. Our Canadian practice is part of Navigant Consulting, Inc., a broad-based consulting firm with offices in the United States, Europe and Asia.

Mr. Steven Whitla, CA•IFA, prepared this report with the assistance of other professionals under his direction and supervision. Mr. Whitla's curricula vitae is included as Appendix 1 to this report.

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## 2.0 SCOPE OF REVIEW

Our analysis is based on a review of information obtained by the Commission and various publicly sourced documents. We understand that the Commission was unable to use various documents originating from the Swiss and German authorities which may have been relevant for our analysis.

With the exception of the BRITAN account, we were not provided with a complete set of bank statements and supporting documents for any account. Without bank statement we are unable to determine the completeness of the information provided.

We were not provided with any original documents during the course of our analysis.

The banking documentation and other relevant information we have reviewed and relied upon in preparing this report are listed, identified and included in Appendix 2 and 3.

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### 3.0 BACKGROUND

Mr. Schreiber was a business consultant working in Canada and elsewhere during the 1980s and 1990s. In at least two instances involving Thyssen Industries ("Thyssen") and Airbus Industries ("Airbus"), he or companies connected with him apparently entered Consultancy Agreements to assist in promoting the corporate interests of Thyssen and Airbus.

Mr. Schreiber alleges he paid Mr. Mulroney \$300,000 cash in 1993 and 1994.

### 3.1 Bank Accounts of Interest

#### 3.1.1 "IAL" 18679 Accounts

Mr. Schreiber provided banking documents to the Commission relating to Swiss Bank Corporation ("SBC") accounts located in Zurich Switzerland listed below:

- 18679.0;
- 18679.1;
- 18679.2;
- 18679.4;
- 18679.5 RUBRIK "MARC";
- 18679.6 "Steiger" and/or "Stewardess";
- 18679.7 RUBRIK "MASTER";
- 41391.0 "FRANKFURT";
- 46341.1 "Jurglund";
- 46341.5 RUBRIK "BRITAN"; and
- 46341.2 RUBRIK "FRED."

For those accounts for which bank statements and/or bank documents were provided, the client number is also referenced with 18679 and/or "IAL". Throughout this report we refer to the account holder of these accounts as "IAL" 18679.

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Several of the bank documents available for accounts #18679.0, #18679.1, #18679.2, #18679.4, #41391.0 "FRANKFURT" and #46341.5 RUBRIK "BRITAN" appear to be authorized by Mr. Schreiber.

Mr. Schreiber also provided a bank statement for a SBC account #56129.8 "FRANKFURT", however, no other documents were provided in relation to this account.

### **3.1.2 Other Bank Accounts**

In addition to the above noted bank accounts, some information was also available for the accounts noted below:

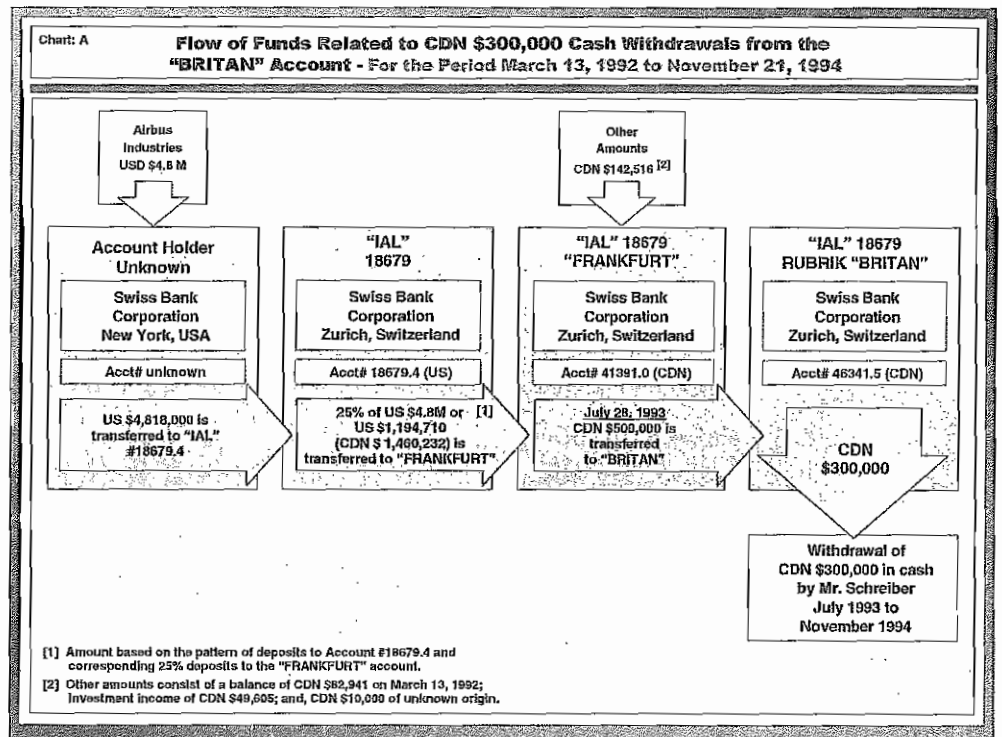
- I.A.L International Aircraft Leasing Limited Verwaltungs- und Privat-Bank:
  - Canadian dollar account #235.972.029;
  - US dollar account #235.972.037; and
  - German Deutschmark account #235.972.053.
- Kensington Anstalt Verwaltungs- und Privat-Bank:
  - US dollar account #235.971.021;
  - Canadian dollar account #235.971.030; and
  - Swiss Franc account #235.971.013.
- Merkur Handels und Industrie AG Canadian dollar account #239.293.030.
- BITUCAN Holdings Ltd.:
  - Bank of Montreal Canadian dollar account #1012-765; and
  - Bank of Nova Scotia Canadian dollar account #340-10.

4.0 SUMMARY OF FINDINGS

A. Mr. Schreiber alleges he gave Mr. Mulrone cash totaling CDN\$300,000 in three equal installments in August 1993, December 1993, and December 1994. Mr. Schreiber indicated to the Commission that the funds paid to Mr. Mulrone came from the BRITAN account. Our funds tracing analysis has determined Mr. Schreiber withdrew cash totaling CDN\$300,000 from the BRITAN account in 4 separate transactions between July 1993 and November 1994.

Our analysis of the facts supports a strong inference that the original source of the monies withdrawn by Mr. Schreiber from the BRITAN account came, in large part, from funds received from Airbus.

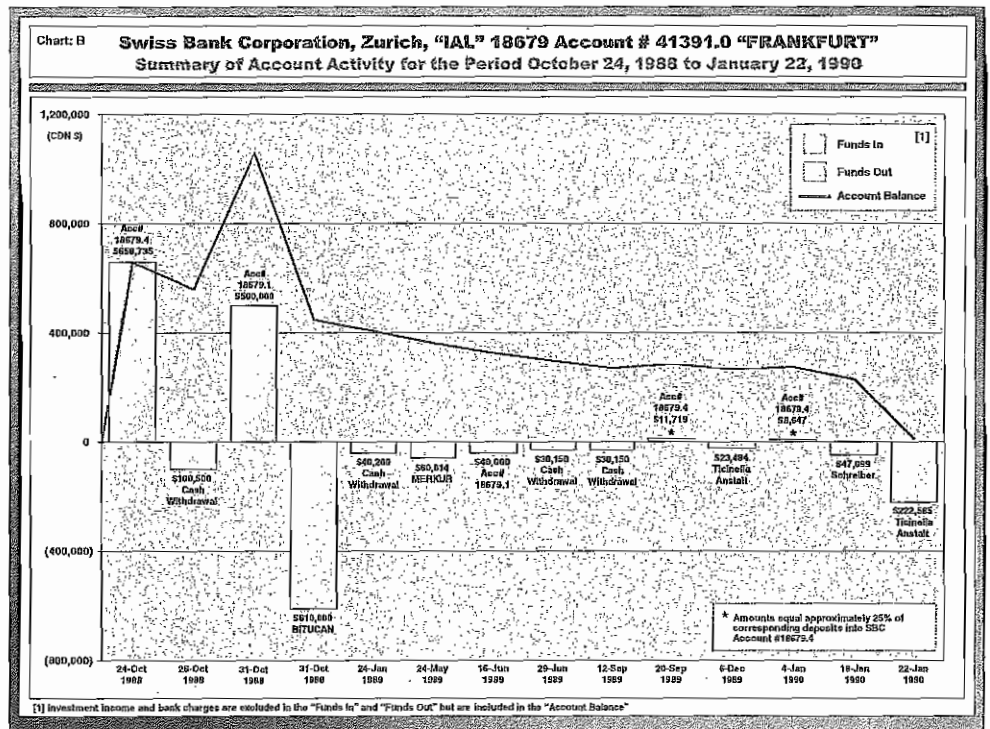
Chart A identifies and illustrates the apparent flow of funds from Airbus, through account #18679.4 and the FRANKFURT account to the BRITAN account between March 1992 and November 1994.



B. Mr. Schreiber has advised the Commission that the source of the money for the payments he allegedly made to Mr. Mulroney was a CDN\$500,000 portion of the commissions he received from Thyssen and deposited into the FRANKFURT account.

Our funds tracing analysis has determined that while it appears CDN\$500,000 of Thyssen funds were deposited into the FRANKFURT account in October 1988, that money was used for other things in the ensuing year and three months such that the balance in the FRANKFURT account at January 22, 1990 was CDN\$11,560.

Chart B identifies and illustrates the sources and uses of funds in the FRANKFURT account between October 24, 1988 and January 22, 1990.



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- C. Our review of the available documents identified many millions of dollars of disbursements for which the ultimate use was not identified. This includes known amounts withdrawn, in cash, between 1987 and 1994 from the "IAL" 18679 accounts, including the FRANKFURT and BRITAN accounts, as follows:

Currency of Cash Withdrawal	Amount
Canadian Dollars	1,356,000
Swiss Francs	3,702,660
Deutsche Marks	3,890,000
French Francs	100,000

See Schedule 17 for further details.

- D. Our review of documents made available to us did not identify any specific payments to Mr. Mulronev.

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**5.0 ACCOUNT  
#46341.5 "BRITAN"**

Bank statements obtained from Mr. Schreiber indicate that account #46341.5 is a SBC account in Zurich, Switzerland with an associated title RUBRIK "BRITAN" ("the BRITAN account"). We note the following with respect to this account:

- The client number associated with the account is 18679 "IAL";
- The account appears to have been established on July 12, 1993;
- The account had a zero balance on July 27, 1993 and the last transaction for which we have information was on January 27, 1995 at which point the account has a negative balance of \$186.73;
- The account is a Canadian dollar account; and
- Cash withdrawals from the account appear to be authorized by Mr. Schreiber.

**5.1 Summary of  
Findings re:  
BRITAN Account**

Based on our review of available information, our funds tracing analysis has determined that:

1. A total of CDN\$300,000 in cash was withdrawn from the BRITAN account - CDN\$100,000 in July, 1993, CDN\$100,000 in November, 1993 and two amounts of CDN\$50,000 each in July and November, 1994.
2. The source of the BRITAN account funds which financed the cash withdrawals totaling CDN\$300,000 came from a CDN\$500,000 transfer from "IAL" 18679 account #41391.0 "FRANKFURT" account on July 28, 1993.

The following table summarizes the funds flowing through this account between July 1, 1993 and January 27, 1995:

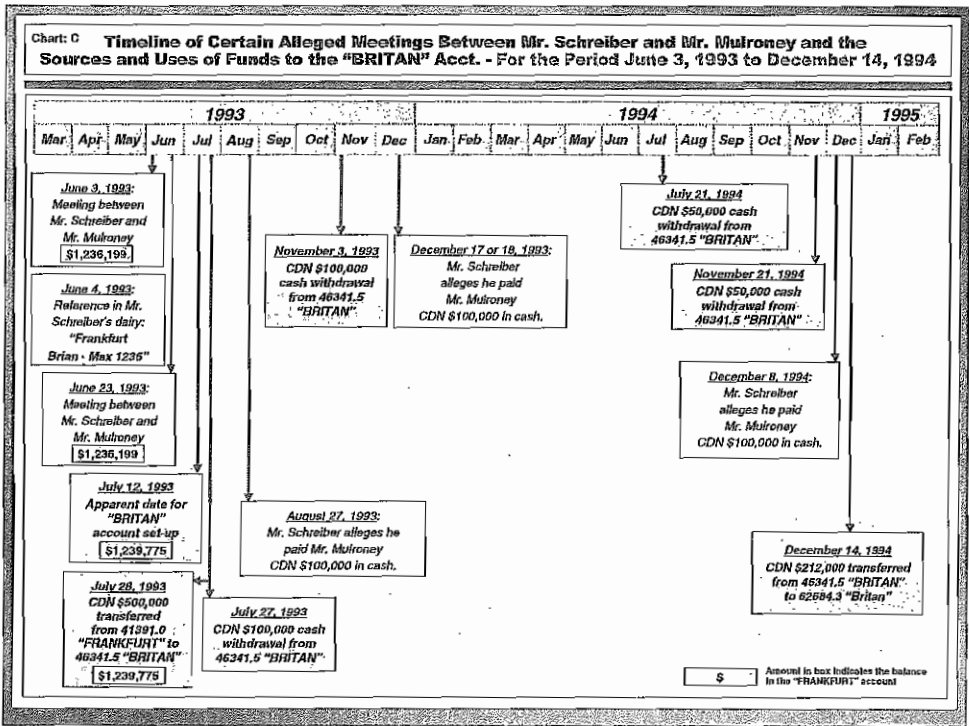


Table 2	
APPARENT SOURCE OF FUNDS	Amount (CDN\$)
Account #41391.0 "FRANKFURT" – July 28, 1993	500,000
Net investment income	13,363
	513,363
APPARENT USE OF FUNDS	
Cash withdrawals	301,550
Account #62684.3 "Britan" – December 14, 1994	212,000
	513,550

Schedule 1 and Chart C of this report provide detailed information about the receipts and disbursements affecting this account between July 1, 1993 and January 27, 1995.

**5.2 BRITAN Account Activity Compared to Alleged Meeting Dates**

A timeline of certain alleged meetings between Mr. Schreiber and Mr. Mulroney and money flows into and out of the BRITAN account is presented in Chart C.



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We note the following with respect to the dates of the cash withdrawals from the BRITAN account:

- The first cash withdrawal was one month before the first alleged payment;
- The second cash withdrawal was 44 or 45 days prior to the second alleged payment to Mr. Mulrone; and
- The third and fourth cash withdrawals were approximately 4 and a half months and 18 days, respectively, prior to the alleged payment to Mr. Mulrone.

We note that the balance in the BRITAN account was transferred to account #62684.3 "Britan" on December 14, 1994, six days after the alleged meeting of Mr. Schreiber and Mr. Mulrone in New York. We were not provided documents indicating how these funds were used.

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**6.0 ACCOUNT #41391.0  
"FRANKFURT"**

As discussed in Section 5.1, the source of the funds to the BRITAN account came from account #41391.0 "FRANKFURT".

Bank statements obtained from Mr. Schreiber indicate that account #41391.0 is a SBC account in Zurich, Switzerland with an associate title "FRANKFURT" ("the FRANKFURT account"). We note the following with respect to this account:

- The client number associated with the account is 18679 "RUBRIK IAL" or "IAL";
- The account had a zero balance at October 24, 1988 and the last transaction for which we have information is March 31, 1994;
- The account is a Canadian dollar account; and
- Bank documents available suggest Mr. Schreiber had signing authority over this account.

We were not provided with documents indicating the sources and uses of all funds in the FRANKFURT account.

6.1 Summary of Findings re: FRANKFURT Account

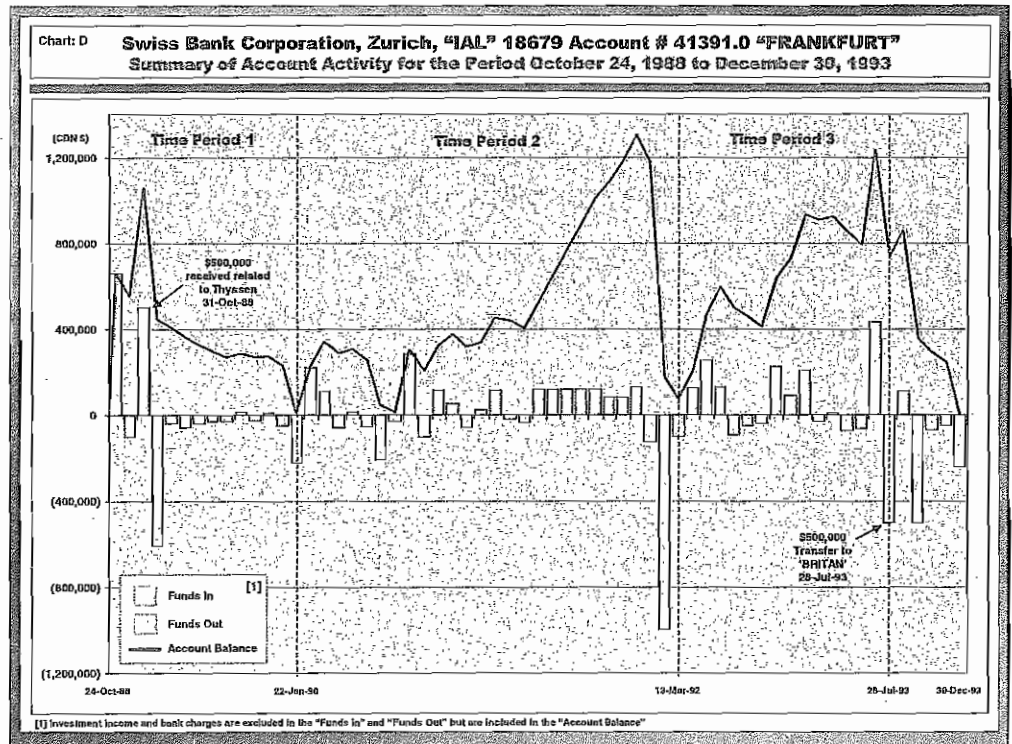
6.1.1 Overall Flow of Funds in the FRANKFURT Account

The table below summarizes the flow of funds through the FRANKFURT account during each of the time periods noted:

Period	Opening Balance (CDN\$)	Sources (CDN\$)	Uses (CDN\$)	Balance (CDN\$)	Reference
20-Oct-1988 to 22-Jan-1990	0	[1] 1,218,890	1,207,330	11,560	Section 6.1.3
22-Jan-1990 to 13-Mar-1992	11,560	1,875,579	1,804,198	82,941	
13-Mar-1992 to 28-Jul-1993	82,941	1,519,837	[2] 859,647	743,131	Section 6.1.2
28-Jul-1993 to 31-Mar-1994	743,131	119,324	858,663	3,792	
		4,733,630	4,729,838		

**Note 1:** Amount includes the \$500,000 received into the FRANKFURT account appearing to relate to the Bear Head Project.  
**Note 2:** Amount includes the \$500,000 transfer from the FRANKFURT account to the BRITAN account on July 28, 1993.

Schedule 2 and Charts D identifies and illustrates the receipts and disbursements affecting this account between October 24, 1988 and December 30, 1993.



**6.1.2 Flow of Funds in the FRANKFURT account March 13, 1992 – July 28, 1993 – CDN\$500,000 Transfer to BRITAN**

The source of funds to the FRANKFURT account which financed the CDN\$500,000 transfer to the BRITAN account on July 28, 1993 was a pool of funds, 91% of which was funded from seven deposits to the FRANKFURT account between March 30, 1992 and May 13, 1993 totaling CDN\$1,460,232 (US\$1,194,710). The remaining 9% comprises a balance in the account of CDN\$82,941, a deposit of CDN\$10,000 from an unknown source and investment income of CDN\$49,605.

Schedule 7 and Chart E identify and illustrate the 7 deposits to the FRANKFURT account which approximate 25% of certain deposits to account #18679.4.

Chart: E **Comparison of Deposits into Acct. # 41391.0 "FRANKFURT" to Deposits into Acct. # 18679.4 - For the Period March 26, 1992 to May 13, 1993**

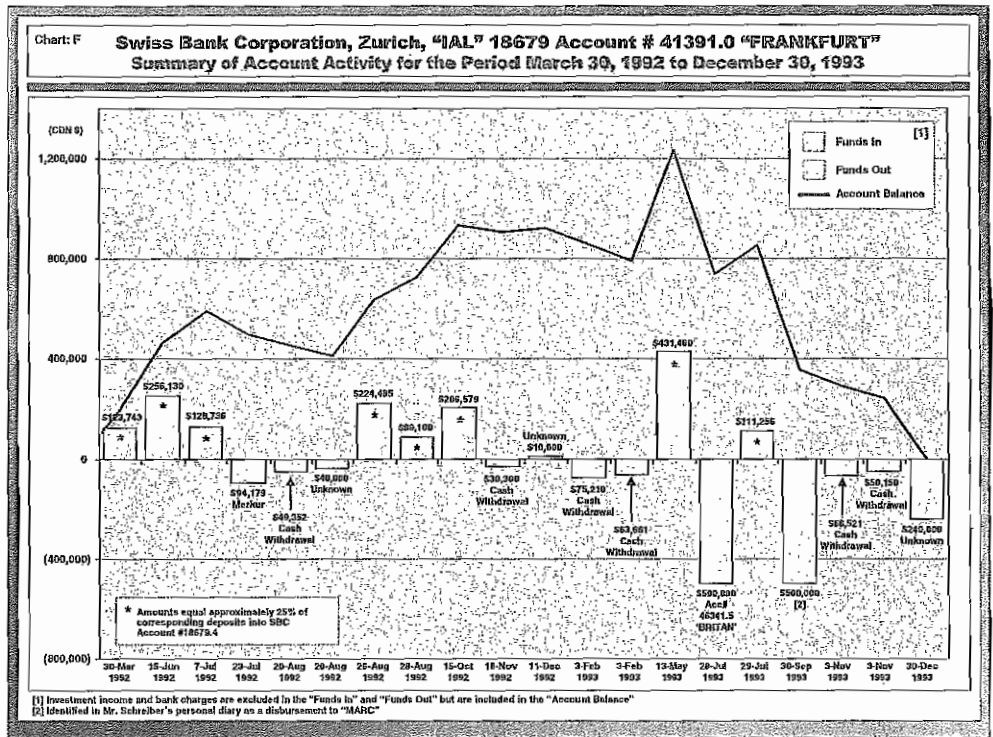
Deposit Date	Deposit to Acct# 41391.0 "FRANKFURT" [Converted to US \$]	Deposit Date	Deposit from Swiss Bank Corporation, New York to Acct# 18679.4	Deposit to "FRANKFURT" as a Percentage of Deposit to 18679.4
30 Mar 92	US \$103,933	26 Mar 92	US \$426,000	24.4%
15 Jun 92	214,874	18 May 92	860,000	25.0%
7 Jul 92	107,603	15 Jun 92	432,000	24.9%
26 Aug 92	188,516	11 Aug 92	763,000	24.7%
28 Aug 92	74,455	24 Aug 92	300,000	24.8%
15 Oct 92	165,329	25 Sept 92	668,000	24.7%
13 May 93	340,000	6 May 93	1,369,000	24.8%
<b>TOTAL</b>	<b>US \$1,194,710</b>		<b>US \$4,818,000</b>	<b>24.8%</b>

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In our opinion the facts relating to these 7 deposits and 17 other prior deposits to the FRANKFURT account support a strong inference that these 24 deposits came from account #18679.4 in that:

- (i) Each of 24 deposits made to the FRANKFURT account equal approximately 25% of certain US dollar deposits to account #18679.4.
- (ii) In six instances, Mr. Schreiber's diaries contain references to "FRANKFURT", "FRA" or "F" being allocated 25% of a larger sum. In two instances, Mr. Schreiber's diaries contain references suggesting an allocation of 25% of a larger sum (and no accounts are referenced). The larger sum appears to be deposited to account #18679.4 while the 25% amounts appears to be deposited to the FRANKFURT account.
- (iii) In 3 of the instances, Mr. Schreiber has provided bank documents which support the 25% pattern.
- (iv) In Mr. Schreiber's statement to the Commission, which was adopted in his testimony to the Commission, he stated he would typically transfer 25% of amounts he received from Airbus to the FRANKFURT account.

Schedule 3 to this report summarizes the flow of funds through this account for the 1 year and 4 month period from March 13, 1992 to July 28, 1993. Chart F illustrates the account activity of the FRANKFURT account between March 31, 1992 and December 30, 1993.



**6.1.3 Flow of Funds in the FRANKFURT Account October 24, 1988 to January 22, 1990 – CDN\$500,000 from Thyssen**

Schedule 4 and Chart B on page 8 summarize the flow of funds through this account for the 1 year and 3 month period for October 24, 1988 to January 22, 1990. During this time period, CDN\$1,218,890 was deposited to the FRANKFURT account including CDN\$500,000 appearing to relate to funds IAL received from Thyssen. These funds were used to fund a number of disbursements including CDN\$610,000 to BITUCAN Holdings Ltd. ("Bitucan"), CDN\$246,068 to Ticinella Anstalt and cash withdrawals of CDN\$201,000. By January 22, 1990 the balance in the FRANKFURT account was CDN\$11,560.

**6.2 FRANKFURT Account Sources of Funds**

We have reviewed and analyzed the available banking documentation and summarize the source of funds to the FRANKFURT account (see Schedule 2).

During the period of October 24, 1988 to March 31, 1994, CDN\$4,733,630 was deposited into this account.

The following table summarizes the apparent sources of funds to the FRANKFURT account:

<b>Table 4</b>	
	<b>Amount (CDN\$)</b>
Account #18679.4	3,900,253
Account #18679.1	500,000
Unknown	173,360
Investment income	160,017
	<u><u>4,733,630</u></u>
See Schedule 5 for further detail.	

**6.2.1 Funds from Account #18679.4 – CDN\$3,900,253**

The FRANKFURT account appears to have received 25 amounts from account #18679.4 as set out below.

(a) Three deposits totaling CDN\$305,112

Banking documents obtained from Mr. Schreiber indicate that three amounts totaling CDN\$305,112 (US\$263,500) were transferred to the FRANKFURT account. Deposits to the FRANKFURT account (converted to US dollars) correspond to the amounts noted in the banking memos, being 25% of the deposit amounts to account #18679.4.

Deposit to Account #18679.4		Banking Documents Indicating Transfers to the FRANKFURT Account		Table 5 %
<u>Date</u>	<u>Amount (US\$)</u>	<u>Date</u>	<u>Amount (US\$)</u>	
14-Sept-1989	40,000	20-Sept-1989	10,000	25%
28-Dec-1989	30,000	4-Jan-1990	7,500	25%
12-Dec-1990	[1] 393,000			
3-Jan-1991	[1] 393,000			
3-Jan-1991	[1] 200,000			
	<u>986,000</u>	25-Jan-1991	[1] 246,000	25%
	<u>1,056,000</u>		<u>263,500</u>	

**Note 1:** References to these transactions appear in Mr. Schreiber's diary on January 19, 1991 as noted below.



We note, in support of the 25% pattern, the following reference in Mr. Schreiber personal diary on January 19, 1991:

Handwritten notes in a diary entry:

893  
893  
200  

---

986 1/2

493  
246  
123  
123  

---

246 Frankfurt

Additional faint notes: "with cash", "maxwell", "Stewardess", "Frankfurt".

This diary reference corresponds to three deposits to account #18679.4 totaling \$986,000 (US\$393,000, US\$393,000 and US\$200,000) and the 25% portion of 986, being 246, corresponds to a US\$246,000 (converted to CDN dollar) deposit to the FRANKFURT account. Further, two corresponding transfers were made from account #18679.4 to account #18679.6 "Stewardess" and account #18679.7 "Maxwell" of US\$123,000 each.

*(b) 21 Deposits totaling CDN\$2,936,407*

A comparison of deposits to the FRANKFURT account with deposits to account #18679.4 reveals that between October 6, 1988 and October 21, 1993, twenty-one (21) deposits (excluding the 3 deposits noted above), totaling \$2,936,407, to the FRANKFURT account correspond to 21 specific deposits to Account #18679.4 in the manner noted below:

- The 21 deposit amounts to the FRANKFURT account are equal to approximately 25% of certain deposits to account #18679.4.
- The 21 deposits to the FRANKFURT account are made shortly after the deposits to account #18679.4.
- In seven instances, references in Mr. Schreiber's personal diary supports the 25 percent allocation of funds deposited to account #18679.4 to the FRANKFURT account.

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- In Mr. Schreiber's statement to the Commission he indicates that he would typically transfer 25% of Airbus funds to the FRANKFURT account.

This comparison is set out in detail in Schedule 6.

No supporting documents were available for our review to definitively confirm if the 21 FRANKFURT deposits did in fact come from account #18679.4. However, the amounts and timing of deposits to the FRANKFURT account and deposits into account #18679.4, the three known transfers outlined in the previous section, references in Mr. Schreiber's personal diary, and Mr. Schreiber's statement to the Commission, in our opinion, support a strong inference that the funds in question deposited to the FRANKFURT account came from account #18679.4.

*(c) One Deposit – CDN\$658,735*

A currency transfer of CDN\$658,735 (US\$548,032 converted using average daily exchange rate) received into the FRANKFURT account on October 24, 1988 corresponds on the basis of 'like time and amount' to a US\$550,000 currency payment from account #18679.4 on October 24, 1988. We note this is the only deposit to the FRANKFURT account appearing to have been received from account #18679.4 that is not consistent with the 25% pattern of the other 24 deposits.

**6.2.2 Funds from Account #18679.1 – CDN\$500,000**

As discussed later in Section 9.2.2, bank documents available suggest the CDN\$500,000 received into the FRANKFURT account on November 2, 1988 is related to funds IAL received from Thyssen in relation to the Bear Head Project.

**6.2.3 Other Sources of Funds**

In addition the above noted deposits the following are additional sources of funds to the FRANKFURT account:

- Three deposits totaling CDN\$173,360 were made to the FRANKFURT account on July 2 and 3, 1991 and December 11, 1992 for which no information is available to determine the source of funds; and
- Investment income totaling CDN\$160,017 was earned.

**6.3 FRANKFURT  
Account Use of  
Funds**

Bank statements available for the FRANKFURT account indicate that CDN\$4,729,839 was disbursed from the account between October 24, 1988 and March 31, 1994. The uses of funds from the FRANKFURT account are summarized in the following table:

<b>Table 6</b>	
	<b>Amount (CDN\$)</b>
Account #34107.0	1,337,000
"IAL" 18679 Accounts	570,000
Cash Withdrawals	752,186
BITUCAN Holdings Ltd. Account #1012-765	610,000
Disbursements Identified as "MARC"	500,000
Ticinella Anstalt Account #242 741 020	246,069
Account #45828.0	216,000
Merkur Handels Account #239 293 030	154,193
Karlheinz Schreiber Account #167047	47,099
Bank charges	17,292
Unknown	280,000
	<u>4,729,839</u>

See Schedule 5 for further detail.

**6.3.1 Account #34107.0 – CDN\$1,337,000**

Between September 28, 1990 and March 13, 1992, CDN\$1,337,000 was transferred from the FRANKFURT account to account #34107.0. The following table summarizes these transfers:

<u>Date of Transfer</u>	<u>Amount (CDN\$)</u>
28-Sept-90	210,000
28-Feb-92	127,000
13-Mar-92	1,000,000
	<u>1,337,000</u>

Documentation for account #34107.0 is not available for our review.

A letter dated December 27, 1995 from Mr. Schreiber to Mr. Frank A. Moores makes reference to a loan Mr. Schreiber purportedly provided to Mr. Moores of CDN\$1,000,000 on March 12, 1992. We note that this loan amount corresponds to the payment made from the FRANKFURT account to account #34107.0 on March 13, 1992.

### 6.3.2 Transfers to "IAL" 18679 Accounts – CDN\$570,000

Our analysis indicates that, in total, CDN\$570,000 was transferred to other "IAL" 18679 accounts as follows:

	<u>Amount (CDN\$)</u>	<u>Ref</u>
Account #46341.5 RUBRIK "BRITAN"	500,000	Section 5.1
Account #18679.1	40,000	Section 9.2
Account #46341.2 RUBRIK FRED	30,000	
	<u>570,000</u>	

Available bank documents suggest that CDN\$30,000 was paid to "IAL" 18679 account #46341.2 RUBRIK FRED from the FRANKFURT account on January 25, 1991. We note in Mr. Schreiber's personal diary on January 19, 1991, the reference "FRA – Fred 30000". No other documents were available to indicated the purpose of this payment.

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### 6.3.3 Cash Withdrawals – CDN\$752,186

Between October 24, 1988 and March 31, 1994 CDN\$752,186 in cash withdrawals were taken from the FRANKFURT account. No documents are available to indicate how these cash withdrawals were used.

### 6.3.4 BITUCAN Holdings Ltd. – CDN\$610,000

A payment of CDN\$610,000 was made from the FRANKFURT account to Bitucan on October 31, 1988. This payment appears to relate to an invoice from Bitucan to Merkur Handels- Und Industrie AG ("Merkur") dated October 20, 1988 for \$710,000. The invoice specifies services were rendered "regarding your industrial project in Indonesia". This invoice appears to have been paid in two amounts on October 31, 1988 through the FRANKFURT account (CDN\$610,000) and account #18679.1 (CDN\$100,000).

Copies of cheques written from Bitucan Bank of Montreal account #1012-765 ("Bitucan account #1012-765") suggest the CDN\$610,000 was used as follows:

Cheque Date	Payee	Amount (CDN\$)
15-Nov-1988	Frank D. Moores	90,000
15-Nov-1988	FDCI/Fred Doucet Consulting International	90,000
15-Nov-1988	Doucet & Associates	90,000
15-Nov-1988	Lemoine Consultants Inc.	90,000
15-Nov-1988	Government Consultants International	250,000
		<u>610,000</u>

Copies of invoices corresponding to these cheque payments do not detail the services provided.

### 6.3.5 Disbursement Identified as "MARC"- CDN\$500,000

On September 30, 1993 a transfer of CDN\$500,000 is made from the FRANKFURT account. The following diary reference is noted in Mr. Schreiber's personal diary on September 21, 1993:

FRA. 856	
1.7. 500	MARC
356	

This diary reference corresponds with the bank statement for the FRANKFURT account such that "856" is the balance in the FRANKFURT account prior to the CDN\$500,000 transfer. A partial bank document indicates there is an account #18679.5 with RUBRIK "MARC" as the associated title. No other bank documents were available to confirm the CDN\$500,000 was in fact deposited in account #18679.5.

**6.3.6 Ticinella Anstalt – CDN\$246,069**

Two payments were made to Ticinella Anstalt account #242 741 020 on December 6, 1989 and January 22, 1990 totaling CDN\$246,069. We note documents available indicate that Ticinella Anstalt purchased a condominium property in Florida, in January, 1990.

**6.3.7 Payments to Account #45828.0 – CDN\$216,000**

Payments totaling CDN\$216,000 were made to an account #45828.0 from the FRANKFURT account as follows:

<u>Date of Transfer</u>	<u>Amount (CDN\$)</u>
28-Sept-1990	56,000
2-Jul-1991	60,000
13-Mar-1992	100,000
	<u>216,000</u>

A reference is noted in Mr. Schreiber's personal diary on July 1, 1991 as follows: "Strobel 60 Ouellet". Mr. Schreiber provided a

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list of transactions for account #45828.0 suggesting the following disbursements were made from this account:

Description	Amount (CDN\$)
"Withdrawals/Exch."	88,977
"SBC MMF C\$ LUX"	125,433
"Transfer"	40,009
"Safe-Custody Charg."	303
	<u>254,722</u>

We note that the disbursements from account #45828.0 noted above (CDN\$254,723) exceed the known transfers to this account from the FRANKFURT account by CDN\$38,723. No other bank documents were available to indicate the use of the CDN\$216,000 or the holder of account #45828.0.

**6.3.8 Payments to Merkur Handels – CDN\$154,193**

Payments were made to Merkur on May 24, 1989 and July 23, 1992 totaling CDN \$154,193. No documents were available to indicate the purpose of these payments.

**6.3.9 Payment to Karlheinz Schreiber Account #167047 – CDN\$47,099**

On January 18, 1990 a payment of CDN\$47,099 was made to Mr. Schreiber's account #167047. No other bank documents were available to indicate the purpose of the payment.

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**7.0 ACCOUNT  
#18679.4**

Mr. Schreiber provided documentation supporting deposits and some withdrawals related to account #18679.4. However, Mr. Schreiber did not provide the bank statements for this account. Without bank statements we are unable to determine the completeness of the information provided. The Commission obtained one bank statement for the period October 6, 1988 to December 21, 1988 through the CBC website.

We note the following with respect to this account:

- The account is a SBC account located in Zurich;
- The client number associated with the account is 18679 "RUBRIK IAL" or "IAL";
- The account has a zero balance at October 6, 1988;
- The account is a US dollar account; and
- Bank documents available suggest Mr. Schreiber had signing authority over this account.

**7.1 Summary of  
Findings re:  
Account #18679.4**

**7.1.1 Source of Funds to Account #18679.4**

We identified deposits totaling US\$21,584,940 to account #18679.4 for the 5 year 2 month period from October 13, 1988 to October 20, 1993. US\$21,412,495 (US\$21,584,940 less US\$172,445) of these funds appear to relate to funds IAL received from Airbus as set out below.

Funds received into account #18679.4 prior to June 30, 1991 amounting to US\$9,739,500 came from IAL account #235.972.037 and Kensington account #235.971.021 (both US dollar accounts). As discussed in Section 8.2 these funds were originally received from Banque Francaise Du Commerce Exterieur ("Banque Francaise"). These funds match a listing provided by Mr. Schreiber detailing amounts IAL received from Airbus between 1988 and June 30, 1991.



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In eight instances in this pre June 30, 1991 period, amounts equal to approximately 25% of the Airbus deposits into account #18679.4, appear to have been deposited into the FRANKFURT account.

After June 1991 account #18679.4 received US\$11,673,000 from a SBC account in New York. No bank records are available to us to determine the source of the funds to the SBC account in New York or the holder of the account. Mr. Schreiber has indicated to the Commission that all funds received in US dollars to the 18679 accounts were received in relation to Airbus.

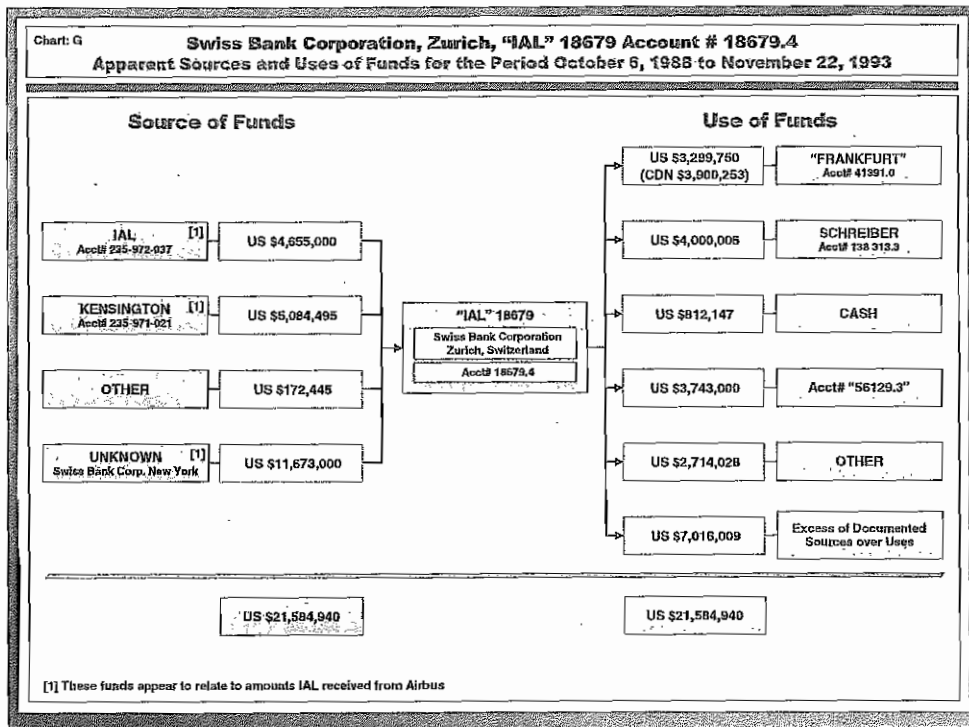
As discussed in Section 14.0, the Public Prosecutor's Office of Augsburg's report obtained by the Commission suggests deposits totaling US\$11,673,000 to account #18679.4 were ultimately received from Airbus.

The fact that Mr. Schreiber indicated all amounts received in US dollars are Airbus and the above payments match a listing of payments the Public Prosecutor's Office of Augsburg determine are Airbus, supports a strong inference these amounts were received in relation to Airbus.

The pattern established of transferring 25% of Airbus commissions received into account #18679.4 to the FRANKFURT account prior to June 30, 1991, continued with the monies received from the SBC New York account after July 1, 1991, in that the FRANKFURT account continued to receive 25% of certain funds account #18679.4 received from the SBC New York account.

Of the US\$21,584,940 received into account #18679.4, we only identified disbursements totaling US\$14,568,931. The excess of identified sources of funds over identified uses of funds is US\$7,016,009. The ultimate disposition of these funds is unknown.

Chart G summarizes the sources and uses of funds to account #18679.4.



**7.2 Account #18679.4  
Source of Funds**

Documents available indicate that \$21,584,940 was deposited to account #18679.4 between the period October 13, 1988 and October 20, 1993. The bank statements for account #18679.4 were not available for our review so we are unable to determine the completeness of deposits to the account.

The following table summarizes the identified sources of the funds into account #18679.4.

Table 12

<u>Dates</u>	<u>Source of Funds</u>	<u>Amount (US\$)</u>	
13-Oct-88 and 21-Oct-88	Kensington Account #235.971.021	5,084,495	[1]
13-Sept-89 to 19-Jun-91	IAL Account #235.972.037	4,655,000	[1]
19-Aug-91 to 20-Oct-93	SBC New York – Unknown Account	11,673,000	[1]
31-Dec-88	Account #18679.0	7,450	
31-Jul-91	Unknown	164,995	
		<u>21,584,940</u>	

See Schedule 8 for further detail.

**Note 1:** Amounts appear to relate to amounts IAL received from Airbus.

### **7.2.1 Amounts from Kensington Anstalt Account #235.971.021 – US\$5,084,495**

On October 13 and 21, 1988 deposits of US\$4,499,995 (US\$4,500,000 less a service fee of US\$5) and US\$584,500, respectively, were made to account #18679.4. Bank documents available suggest that the US\$4,499,995 was received into account #18679.4 by way of cheque #103992814. These deposits appear to originate from amounts IAL received from the Banque Francaise and flowed into account #18679.4 as follows:

- On October 3 and 5, 1988 Verwaltungs Und Privat Bank Vaduz, Liechtenstein, IAL account #235.972.037 ("IAL account #235.972.037") received two amounts totaling US\$5,100,000 from Banque Francaise (the balance in IAL account #235.972.037 prior to these deposits was US\$45,000);
- On October 5 and 21 two withdrawals were made from IAL account #235.972.037 to Kensington account #235.971.021 totaling \$4,584,500;
- On October 5, 1988 cheque #103992814 was written from Kensington account #235.971.021 for US\$4,500,000; and
- On October 21, 1988 US\$584,500 was transferred from Kensington account #235.971.021 an account 18679.

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The following supports these funds having been received in relation to Airbus:

- the amounts received by IAL account #235.972.037 from Banque Francaise match a schedule provided by Mr. Schreiber summarizing amounts IAL received from Airbus;
- Mr. Schreiber indicated in his statement to the Commission that all US dollar amounts received in "IAL" 18679 accounts were received in relation to Airbus; and
- the Public Prosecutor's Office of Augsburg identifies these amounts as having been received by IAL from Airbus.

**7.2.2 Amounts from IAL Account #235.972.037 – US\$4,655,000**

Between September 13, 1989 and June 19, 1991 15 deposits to account #18679.4 were made totaling US\$4,655,000 that are consistent, based on time and amounts of the transactions, to withdrawals from IAL account #235.972.037. This fact, along with the fact that the withdrawals from IAL account #235.972.037 specify the destination of the funds as an account #18679 (see Schedule 9), supports a strong inference that the funds in question deposited to account #18679.4 came from IAL account #235.972.037.

The following supports these funds having been received in relation to Airbus:

- the amounts received by IAL account #235.972.037 from Banque Francaise match a schedule provided by Mr. Schreiber summarizing amounts IAL received from Airbus;
- Mr. Schreiber indicated in his statement to the Commission that all US dollar amounts received in "IAL" 18679 accounts were received in relation to Airbus; and
- the Public Prosecutor's Office of Augsburg identifies these amounts as having been received by IAL from Airbus.

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### **7.2.3 SBC New York – Unknown Account – US\$11,673,000**

Schedule 8 lists thirty-one (31) US dollar deposits totaling US\$11,673,000 to account #18679.4 between August 19, 1991 and October 20, 1993. These deposits appear to have originated from a SBC account in New York. Documentation available does not indicate the account number of the originating bank account nor the holder of the account.

The following supports these funds having been received in relation to Airbus:

- Mr. Schreiber's indicates in his statement to the Commission that all US dollar amounts received in "IAL" 18679 accounts were received in relation to Airbus; and
- the Public Prosecutor's Office of Augsburg identified of these amounts as having been received by IAL from Airbus.

### **7.3 Account #18679.4 Use of Funds**

Documents available indicate that US\$14,568,931 of the funds were withdrawn from account #18679.4 between October 6, 1988 and November 28, 1994. Schedule 10 lists the known disbursements from this account. As the bank statements for account #18679.4 are not available for our review, we are unable to determine the completeness of the disbursements from the account.

The following table summarizes the apparent uses of funds from account #18679.4.

Uses of Funds	Amount (US\$)
"IAL" 18679 Accounts	4,496,222
Karlheinz Schreiber	4,000,006
Transfer to Account #56129.3	3,743,000
Cash withdrawals	812,147
Other	1,517,556
	<u>14,568,931</u>

### 7.3.1 Transfers to "IAL" 18679 Accounts – US\$4,496,222

Our analysis indicates that, in total, US\$4,496,222 was apparently transferred to other "IAL" 18679 accounts as follows:

"IAL" 18679 Accounts	Amount (US\$)	Ref
#41391.0 "FRANKFURT"	[1] 3,299,750	Section 6.1
#18679.7 "MASTER/MAXWELL"	611,250	
#18679.7 "Steiger/Stewardess"	337,750	
#18679.0	131,868	Section 10.2
#46341.1 "Jurglund"	100,604	
#18679.1	15,000	Section 9.2
	<u>4,496,222</u>	

**Note 1:** The amount noted is \$3,900,253 in Canadian dollars.

We discuss transfers to the FRANKFURT account, account #18679.0 and account #18679.1 in sections 6.1, 10.2 and 9.2, respectively, of our report.

### 7.3.2 Payment to Karlheinz Schreiber - US\$4,000,006

A bank document available indicates that on October 6, 1988, US\$4,000,006 was paid to account #138313.3, a SBC account in New York belonging to Mr. Schreiber. Another bank document indicates that US\$4,000,000 was paid to account #511618,

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another SBC account in New York belonging to Mr. Schreiber. As both documents reference cheque number 138319, we are unable to determine to which of Mr. Schreiber's accounts these funds were deposited. No documents were available indicating how Mr. Schreiber used these funds.

**7.3.3 Transfer to Account #56129.3 – US\$3,743,000**

A bank document available indicates that on November 28, 1994, US\$3,743,000 was transferred to an account #56129.3. No documents were available indicating the holder of this account or the purpose of this transfer.

**7.3.4 Cash Withdrawals – US\$812,147**

Between April 11, 1990 and July 3, 1992 US\$812,147 was withdrawn in cash from account #18679.4. No documents were available to determine the ultimate use of the cash withdrawn.

**7.3.5 Other – US\$1,517,556**

Other payments totaling US\$1,517,556 were made to Bayerische Bitumen-Chemie, Kensington, Pagani and Wullschleger, Merkur, IAL, Franko Commercial and to unknown sources. No documents were available indicating the purpose of these payments.

**7.3.6 Excess of Documented Sources of Funds over Documented Uses of Funds – US\$7,016,009**

The known funds flowing into account #18679.4 exceed the known funds flowing from account #18679.4 as follows:

<b>Table 15</b>	
	<b>Amount (US\$)</b>
Documented Uses	14,568,931
Documented Sources	21,584,940
Excess of Documented Sources over Documented Uses	<u>7,016,009</u>

No banking information was available to enable us to identify the use (if any) of these funds.

Mr. Schreiber's personal diaries suggest that certain deposits to account #18679.4 were allocated to other 18679 accounts. In cases where 25% of deposits to account #18679.4 are allocated to the FRANKFURT account, Mr. Schreiber's diary references also indicate that allocations of 12.5% each to "Master/Maxwell" and "Steiger/Stewardess" accounts were also made.



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**8.0 IAL ACCOUNT  
#235.972.037**

Bank documents obtained by the Commission from Mr. Giorgio Pelossi and Ms. Stevie Cameron via the DOJ, indicate that IAL account #235.972.037 is an account from Verwaltungs Und Privat Bank in Vaduz, Liechtenstein. We note the following with respect to this account:

- The holder of the account is I.A.L. International Aircraft Leasing Limited, 9490 Vaduz;
- The mailing address noted on the statement is FMT S.A., Postfach 2912, 6901 Lugano;
- The account is a US dollar account; and
- The account appears to have a zero balance on October 3, 1988.

As bank statements prior to June 30, 1989 were not available, we cannot determine the completeness of the information available.

**8.1 Summary of Findings re: Account  
#235.972.037**

Funds totaling US\$10,910,774 were deposited into this account. It appears 99% of these funds were received from Airbus via Banque Francaise.

Schedule 11 summarizes the flow of funds through this account for the 2 year and 9 month period from October 3, 1988 to June 28, 1991.

Further, it appears US\$9,739,500 of these funds were transferred, directly or indirectly, to account #18679.4.

**8.2 IAL Account  
#235.972.037  
Source of Funds**

During the period October 3, 1988 and June 30, 1991, \$10,910,774 was deposited into IAL Account #235.972.037.

Bank documents indicate that the source of funds deposited to IAL Account #235.972.037 were primarily from Banque Francaise.

Schedule 12 outlines the monies that were received from Banque Francaise. We note that a schedule provided by Mr. Schreiber outlines, on a yearly basis, the amounts IAL received from Airbus between October 1988 and June 1991. We note that payments received from Banque Francaise into IAL account #235.972.037 match, on a yearly basis, the summary provided by Mr. Schreiber.

Further, as discussed in Section 14.0, these payments match the payments identified by the Public Prosecutor's Office of Augsburg as being received by IAL from Airbus.

**8.3 IAL Account #235.972.037 Use of Funds**

During the period October 3, 1988 and June 30, 1991, payments totaling \$10,685,957 were made from IAL account #235.972.037. The following table summarizes the disbursements from IAL account #235.972.037:

Table 16		
Use of Funds	Amount (US\$)	Reference
Kensington Account #235.971.021	5,084,500	Section 7.2.1
Account #18679.4	4,655,000	Section 7.2.2
	9,739,500	
Payments to Erfel Anstalt	826,640	
Bank charges and payment for which the destination is unknown	84,817	
Kensington Anstalt Account #235.971.013	35,000	
Excess of Documented Sources over Uses	55,919	
	10,741,876	
See Schedule 13 for further detail.		

**8.3.1 Payments to Kensington account #235.971.021 and Account #18679.4 – US\$9,739,500**

Our analysis set out in Sections 7.2.1 and 7.2.2 above supports a strong inference that US\$9,739,500 deposited to account #18679.4 came, directly or indirectly, from IAL account #235.972.037.

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**8.3.2 Payments to Erfel Anstalt – US\$826,640**

Between August 16, 1990 and May 29, 1991, seven payments totaling \$826,640 were made to Erfel Anstalt.

We understand that Erfel Anstalt was Mr. Pelossi's company at the time these payments were made.

**8.3.3 Other Payments – US\$119,817**

An additional \$119,817 was disbursed from IAL account #235.972.037. Of this,

- \$35,000 was paid to Kensington account #235.971.013;
- \$84,746 was paid to unknown sources; and
- \$71 was paid in bank charges.

**8.3.4 Excess of Documented Sources over Documented Uses of Funds – US\$55,919**

We note that, between October 3, 1988 and June 30, 1989, the known funds flowing into IAL account #235.972.037 exceed the funds flowing from the account by US\$55,919. The balance in IAL account #235.972.037 on June 30, 1989 is US\$75; therefore, we are unable to account for a minimum of US\$55,919 in disbursements from the account.

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**9.0 ACCOUNT  
#18679.1**

Mr. Schreiber provided copies of documentation supporting deposits and withdrawals related to account #18679.1 between October 14, 1986 and October 27, 1994. A copy of a statement for this account for the period June 30, 1988 to December 23, 1988 was also provided. Without the remaining bank statements we are unable to determine the completeness of the information provided.

We note the following with respect to this account:

- The client number associated with the account is 18679 "RUBRIK IAL" or "IAL";
- The account is a SBC account located in Zurich, Switzerland;
- The account is a Canadian dollar account; and
- Bank documents available suggest Mr. Schreiber had signing authority over this account.

**9.1 Summary of  
Findings re:  
Account #18679.1**

We identified apparent sources of funds to this account totaling CDN\$4,536,182 and apparent disbursements of CDN\$7,525,152 resulting in an excess of documented uses over sources of funds of CDN\$2,988,970. The documented sources included CDN\$1,100,000 appearing to related to funds IAL received from Thyssen. The identified uses of funds includes transfers on October 31, 1988 of CDN\$500,000 to the FRANKFURT account and CDN\$100,000 transfer to Bitucan account #1012-765.

**9.2 Account #18679.1  
Source of Funds**

Available documents indicate that CDN\$4,536,182 was deposited to account #18679.1 between the period October 14, 1986 and October 27, 1994.

The following table summarizes the known funds into account #18679.1.

Table 17

Source of Funds	Amount (CDN\$)	Ref.
Account #47252.3	1,446,650	
Kensington Account #235.971.030	1,100,000	
Messerschmitt Boelkow Blohm GMBH	932,237	
Account #41391.0 "FRANKFURT"	40,000	Section 6.3.2
Account #18679.4	17,295	Section 7.3.1
Deposits of Unknown Origin	1,000,000	
	<hr/> 4,536,182	
Excess of Documented Uses over Sources	2,988,970	
	<hr/> <b>7,575,152</b> <hr/>	
See Schedule 14 for further details.		

### 9.2.1 Account #47252.3 – CDN\$1,446,650

On December 12, 1991 CDN\$1,446,650 was received into Account #18679.1 from account #47252.3. Available documentation does not indicate the reason for this transfer to account #18679.1.

### 9.2.2 Kensington Account #235.971.030 – CDN\$1,100,000

On October 31, 1988 and November 1, 1988 two amounts totaling \$1,100,000 from Kensington account #235.971.030 were deposited to account #18679.1. Bank documents available for Kensington account #235.971.030 suggest these funds originated from IAL account #235.972.029. The payments to IAL account #235.972.029 were received from Thyssen and appear to relate to the Bear Head Project.

We note that of the CDN\$1,100,000 transferred into account #18679.1, CDN\$500,000 was transferred on October 31, 1988 into the FRANKFURT account as discussed in Section 6.2.2.

### 9.2.3 Messerschmitt Boelkow Blohm GMBH – CDN\$932,237

Bank documents available between October 14, 1986 and July 21, 1987 indicate that three amounts totaling CDN\$932,237 were

deposited into Account #18679.1 from Messerschmitt Boelkow Blohm GMBH.

**9.2.4 Deposits of Unknown Origin – CDN\$1,000,000**

A deposit of CDN\$1,000,000 was received into account #18679.1 on October 20, 1988. Available documentation does not indicate the reason or source for this transfer.

**9.2.5 Excess of Documented Uses over Sources of Funds – CDN\$2,988,970**

We note that the known uses of funds from account #18679.1 exceed the known sources of funds to account #18679.1 by CDN\$2,988,970. No bank documents were provided to determine the source of these funds.

**9.3 Account #18679.1  
Use of Funds**

Available documents indicate that payments totaling CDN\$7,525,152 were made from account #18679.1 between the period October 24, 1986 and October 27, 1994.

The following table summarizes the known disbursements from Account #18679.1.

Uses of Funds	Amount (CDN\$)
Mr. Schreiber and Associated Companies	2,148,586
Cash withdrawals	1,990,449
Kensington Anstalt, IAL and Merkur Handels	1,054,043
Unknown	1,000,000
Other	1,332,074
	<u>7,525,152</u>

See Schedule 14 for further detail.

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**9.3.1 Payments to Karlheinz Schreiber and Associated Companies –  
CDN\$2,148,586**

Between October 24, 1986 and January 21, 1994 payments totaling CDN\$2,148,586 were made to Mr. Schreiber and companies he is associated with.

Available documentation does not indicate the ultimate disposition of these funds.

**9.3.2 Cash Withdrawals – CDN\$1,990,449**

Between October 4, 1987 and October 27, 1994, CDN\$1,990,449 in cash withdrawals were made from account #18679.1. Available documentation does not indicate the ultimate disposition of these funds.

**9.3.3 Payments to Kensington Anstalt, IAL and Merkur Handels –  
CDN\$1,053,043**

Payments totaling CDN\$1,054,043 were made to the Kensington, IAL and Merkur between October 25, 1989 and September 13, 1994. Available documentation does not indicate the ultimate disposition of these funds.

**9.3.4 Unknown – CDN\$1,000,000**

A disbursement of CDN\$1,000,000 was made from account #18679.1 on October 20, 1988. No documents were available indicating how these funds were used.

**9.3.5 Other Payments – CDN\$1,332,074**

Six other payments were made from account #18679.1 between October 27, 1986 and July 29, 1993 as follows:

Table 19

<u>Dates</u>	<u>Uses of Funds</u>	<u>Amount (CDN\$)</u>
31-Oct-1986	Account #34107.0	260,641
27-Jul-1987	FMT Financial Management Trust SA	87,724
5-Nov-1987	Account #34107.0	149,000
31-Oct-1988	Account #41391.0 "FRANKFURT"	500,000
7-May-1992	Sidmer S.A. Account #0605 94 18001	179,700
29-Jul-1993	Robert Hladun Trust Account #0841-0585830	155,009
		<u>1,332,074</u>

See Schedule 14 for further detail.

A letter dated November 3, 1987 from Mr. Schreiber to SBC with instructions related to the transfer of CDN\$149,000 on November 5, 1987 indicates the payment was for "Herrn Moors".

An invoice provided by Mr. Schreiber from Sidmer S.A. dated February 4, 1992 suggests the payment of CDN\$179,700 makes up a partial payment related to the purchase of a boat.

We understand that Mr. Robert Hladun was Mr. Schreiber's counsel at the time the CDN\$155,009 was paid to Trust account #0841-0585830.

No documents were provided indicating the purpose of these payments.



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**10.0 ACCOUNT  
#18679.0**

Mr. Schreiber provided copies of documents supporting deposits and withdrawals related to account #18679.0 between February 22, 1988 and November 5, 1993. However, Mr. Schreiber did not provide the bank statements for this account. Without the bank statements, we are unable to determine the completeness of the information provided.

We note the following with respect to this account:

- The client number associated with the account is 18679 "RUBRIK IAL" or "IAL";
- The account is a SBC account located in Zurich, Switzerland;
- The account is a Swiss Franc account; and
- Bank documents available suggest Mr. Schreiber had signing authority over this account.

**10.1 Summary of  
Findings re:  
Account #18679.0**

We identified sources of funds to this account totaling SFr.1,679,000, of which SFr.1,400,000 appears to have come from Kensington account #235.971.013. We identified a total of SFr.681,659 being disbursed, including cash withdrawals of SFr.520,000.

Schedule 15 to this report summarizes the identified flow of funds through this account for the 5 year and eight month period between February 22, 1988 and November 5, 1993.

The excess of identified sources of funds over identified uses of funds is SFr.997,341. The ultimate disposition of these funds is unknown.

**10.2 Account #18679.0  
Source of Funds**

As summarized in Schedule 15, documents available indicate that SFr.1,679,000 were deposited to Account #18679.0 between the period February 22, 1988 and November 5, 1993.

The following table summarizes the known funds deposited into account #18679.0.

<b>Table 20</b>	
<u>Source of Funds</u>	<u>Amount (SFr.)</u>
Kensington Account #235 971 013	1,400,000
Account #18679.4	198,000
Account #18679.2	81,000
	<u>1,679,000</u>
See Schedule 15 for further detail.	

Available documentation does not indicate the reason for these transfers.

**10.3 Account #18679.0  
Use of Funds**

Available documents indicate that SFr.681,659 were disbursed from account #18679.0 between February 22, 1988 and August 12, 1993.

The following table summarizes the known funds out of account #18679.0.

<b>Table 21</b>	
<u>Uses of Funds</u>	<u>Amount (SFr.)</u>
Cash Disbursements	520,000
Karlheinz Schreiber Account #619 110 00	150,000
Account #18679.4	11,659
	<u>681,659</u>
See Schedule 15 for further detail.	

Available documentation does not indicate the reason for these disbursements.

We note that the known funds flowing into account #18679.0 exceed the known funds flowing from account #18679.0 by SFr.997,341. No banking information was available with respect to the use (if any) of these funds.

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**11.0 ACCOUNT  
#18679.2**

Mr. Schreiber provided documentation supporting deposits and withdrawals related to account #18679.2 between January 15, 1987 and October 4, 1994. Mr. Schreiber did not provide the bank statements for this account, as such, we are unable to determine the completeness of the information provided.

We note the following with respect to this account:

- The client number associated with the account is 18679 "RUBRIK IAL" or "IAL";
- The account is a SBC account located in Zurich, Switzerland;
- The account is a Deutsche Mark (DM) account; and
- Bank documents available suggest Mr. Schreiber had signing authority over this account.

**11.1 Summary of  
Findings re:  
Account #18679.2**

We identified apparent sources of funds totaling approximately DM 7,929,349, including DM 7,424,847 from account #47252. The identified uses of funds included DM 8,500,034 to Herbert H.M. Leiduck and cash withdrawals of DM 3,468,358 resulting in an excess of documented uses over sources of funds of approximately DM 4,621,904.

Schedule 16 to this report summarizes the identified flow of funds through this account for the 7 year and 9 month period from January 15, 1987 and October 4, 1994.

**12.0 BITUCAN HOLDINGS LIMITED ACCOUNT #340-10**

The Commission obtained bank statements related to Bitucan's Bank of Nova Scotia account #340-10 ("account #340-10") for the period March 31, 1989 to December 31, 1993 (with the exception of the periods November 1 to 29, 1991 and January 1 to 31, 1992).

**12.1 Source of Funds to Account #340-10**

The bank documents available indicate that, in total, CDN\$1,963,592 was received into account #340-10 as follows:

<u>Description</u>	<u>Amount (CDN\$)</u>
Account #18679.1	579,940
Merkur account #239,293.030	399,990
Unknown	960,322
Credit Memos and Interest	23,340
	<u>1,963,592</u>

We note that, based on similar amounts and dates of transactions, seven transfers totaling CDN\$579,940 appear to have come from account #18679.1. No other documents are available to indicate the source of funds to account #340-10.

**12.2 Use of Funds From Account #340-10**

The bank statements available indicates there were disbursements of CDN\$1,857,856 from account #340-10 as follows:

<u>Description</u>	<u>Amount (CDN\$)</u>
Cheques	1,203,582
Outgoing Telephone Transfers	447,686
Debit Memos	205,697
Bank Charges and Fees	793
Davis & Henderson Ltd.	98
	<u>1,857,856</u>

No further documents are available to indicate how these funds were used.

**13.0 THYSSEN  
INDUSTRIES  
PAYMENTS TO IAL**

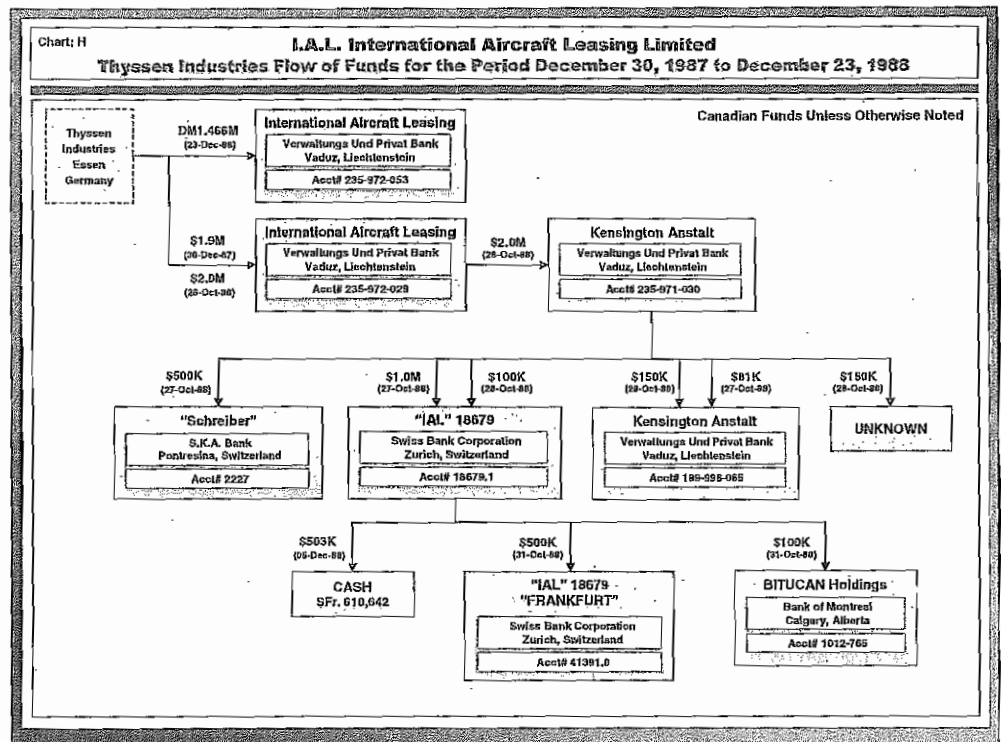
Bank documents available indicate that between December 30, 1987 and December 23, 1988, Thyssen made the following payments to IAL in relation to the Bear Head Project:

<u>Date</u>	<u>Amount</u>
30-Dec-1987	CDN\$1,900,000
26-Oct-1988	CDN\$2,000,000
23-Dec-1988	DM 1,466,000

Thyssen paid CDN\$1,900,000 and CDN\$2,000,000 to IAL account #235.972.029 on December 30, 1987 and October 26, 1988 respectively. An invoice dated October 4, 1988 issued by IAL to Thyssen suggests these payments were in relation to the Bear Head Project.

A letter from Mr. Haastert dated October 14, 1987 suggests that \$1.5 million was also paid to Mr. Schreiber prior to October 14, 1987 as a loan, however, no bank records are available indicating this payment was made. Mr. Schreiber indicated in his testimony to the Commission this amount was received as a loan and was forgiven.

Chart H identifies and illustrates the flow of funds relating to these payments.



**13.1 Payments on  
December 30,  
1987 –  
CDN\$1,900,000**

On December 30, 1987 IAL received a payment of CDN\$1,900,000 from Thyssen. An IAL invoice to Thyssen dated October 4, 1988 suggests the CDN\$1,900,000 payment was related to the Bear Head Project. A letter dated December 24, 1987 from Mr. Pelossi to Thyssen indicating that IAL had fulfilled its obligations in terms of assisting in the procurement of property from the Province of Nova Scotia.

**13.2 Payments on  
December 28,  
1988 –  
CDN\$2,000,000**

Chart H shows the flow of funds from Thyssen to various entities including to the FRANKFURT account. Bank documents available indicate that CDN\$2,000,000 was transferred into IAL account #235.972.029 on October 28, 1988 from Thyssen. This amount was transferred out of the IAL account #235.972.029 and into the Kensington account #235.971.030 on October 28, 1988.

Of this CDN\$2,000,000 transferred into the Kensington account #235.971.030, CDN\$1,981,466 was transferred out of the account as follows:

Table 25	
Transfers from <u>Kensington Account #235.971.030</u>	Amount <u>(CDN\$)</u>
"Schreiber" account #2227 in Pontresina	500,000
Kensington account #199.998.065	231,466
Account #18679.1	1,100,000
Unknown account	150,000
	<u>1,981,466</u>

As detailed in Schedule 14 of this report, the CDN\$1,100,000 of Thyssen funds transferred into account #18679.1 appear to have been disbursed as follows:

- CDN\$500,000 was transferred to the FRANKFURT account on October 31, 1988. By January 22, 1990, the balance in the FRANKFURT account was \$11,560;
- CDN\$503,000 funded a cash withdrawal on December 5, 1988 for which the ultimate disposition is unknown; and
- CDN\$100,000 was transferred to Bitucan account #1012-765.

**13.3 Loan Payments -  
DM 1,466,000**

On December 23, 1988, DM 1,466,000 (CDN\$986,873 converted using the average daily exchange rate) was received into the IAL account #235.972.053 in Liechtenstein. Mr. Schreiber indicated in his testimony to the Commission this amount was received as a loan and was forgiven.

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**14.0 AIRBUS  
INDUSTRIES  
PAYMENTS TO IAL**

The Commission obtained a copy of the Public Prosecutor's Office of Augsburg's report related to the request for the extradition of Mr. Schreiber. The Report suggests that IAL received funds totaling US\$22,540,000 from Airbus. Broken-down by time period the report specifies that IAL received funds from Airbus as follows:

	<u>Amount (US\$)</u>
3-Oct-88 to 28-Jun-91	10,867,000
19-Aug-91 to 20-Oct-93	11,673,000
	<u>22,540,000</u>

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NAVIGANT CONSULTING

*Navigant Consulting*







## OLIPHANT COMMISSION

### Schedule of Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"

For the Period July 1, 1993 to January 27, 1995 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
7/1/1993	7/1/1993	Saldovortrag (Balance carried over)			0.00	
7/27/1993	7/27/1993	Auszahlung Noten (Disbursement note)	100,500.00		(100,500.00)	Cash Withdrawal
7/26/1993	7/28/1993	Uebertrag (Transfer)		500,000.00	399,500.00	Account #41391.0 "FRANKFURT"
8/31/1993 - 10/29/1993	8/31/1993 - 10/29/1993	Treuhandkommissi, Verguetung (Trustee commissions, payment)		3,104.89	402,604.89	Net investment income
11/3/1993	11/3/1993	Auszahlung Noten (Disbursement note)	100,300.00		302,304.89	Cash Withdrawal
11/4/1993 - 7/6/1994	11/4/1993 - 7/6/1994	Treuhandkommissi, Verguetung, Spesen (Trustee commissions, payment, charge)		6,263.39	308,568.28	Net investment income
7/21/1994	7/21/1994	Auszahlung Noten (Disbursement note)	50,250.00		258,318.28	Cash Withdrawal
8/8/1994 - 11/14/1994	8/8/1994 - 11/14/1994	Treuhandkommissi, Verguetung (Trustee commissions, payment)		3,747.30	262,065.58	Net investment income
11/21/1994	11/21/1994	Auszahlung Noten (Disbursement note)	50,500.00 [2]		211,565.58	Cash Withdrawal
12/9/1994	12/14/1994	Verguetung (Payment)	212,000.00		(434.42)	Account #62684.3 "Britan"
12/9/1994 - 1/27/1995	12/9/1994 - 1/27/1995	Spesen, Sollzins (Charges, interest)		247.69	(186.73)	Net investment income
			513,550.00	513,363.27	(186.73)	

#### Notes:

[1] This schedule was prepared with reference to "BRITAN" bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report.

[2] Mr. Schreiber's personal diary on November 21, 1994 references "50 Britan CA" in relation to a meeting with Mr. Strobel.



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## OLIPHANT COMMISSION

### Summary Schedule of Apparent Source and Use of Funds

Swiss Bank Corporation, Zurich

"IAL" 18679 Account #41391.0 "FRANKFURT"

For the Period October 24, 1988 to March 31, 1994 [1]

	<u>Amount</u> <u>(CDN \$)</u>
<b>APPARENT SOURCE OF FUNDS</b>	
Balance as at October 20, 1988	-
<hr/>	
Transfers from Account #18679.4:	
3 deposits	305,111.63 [2]
21 deposits	2,936,406.73 [3]
1 deposit	658,735.00 [4]
	<hr/> 3,900,253.36
Transfers from Account #18679.1	500,000.00 [5]
Unknown	173,359.88
Investment income	160,017.25
	<hr/> 4,733,630.49
<hr/>	
<b>APPARENT USE OF FUNDS</b>	
Account #34107.0 [6]	1,337,000.00
<hr/>	
<i>"IAL" 18679 Accounts:</i>	
"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"	500,000.00
"IAL" 18679 Account #18679.1	40,000.00
"IAL" 18679 Account #46341.2 RUBRIK FRED	30,000.00
	<hr/> 570,000.00
Cash withdrawals	752,186.29
BITUCAN Holdings Ltd.	610,000.00
Disbursement identified as "MARC"	500,000.00 [7]
Ticinella Anstalt Account #242 741 020	246,068.50
Account #45828.0	216,000.00
Merkur Handels Account #239 293 030	154,193.25
Karlheinz Schreiber Account #167047	47,098.76
Bank charges	17,291.79
Unknown	280,000.00
	<hr/> 4,729,838.59
Balance at March 31, 1994	<hr/> <u>3,791.90</u>

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## OLIPHANT COMMISSION

### Summary Schedule of Apparent Source and Use of Funds Swiss Bank Corporation, Zurich "IAL" 18679 Account #41391.0 "FRANKFURT" For the Period October 24, 1988 to March 31, 1994 [1]

#### Notes:

- [1] This schedule was prepared with reference to "FRANKFURT" bank account documents and personal diaries provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Our detailed analysis of the information provided is found in Schedule 5.
- [2] This total comprises 3 deposits of CDN\$11,719.20 (US\$10,000), CDN\$8,647.43 (US\$7,500) and CDN\$284,745.00 (US\$246,000) on September 20, 1989, January 4, 1990 and January 25, 1991, respectively, for which documents are available showing transfers were made from account #18679.4 to the FRANKFURT account. Further, the transfers made were 25 percent of certain US Dollar deposits made to the 18679.4 account.
- [3] This total comprises 21 deposits, each of which equal approximately 25 percent of certain US dollar deposits made to account #18679.4. Each of the 21 deposits were made to the FRANKFURT account a short time after the certain US Dollar deposits to account #18679.4.
- [4] This deposit corresponds on the basis of a like amount (after conversion to USD using an average daily exchange rate at the time) and time to a US \$550,000 withdrawal made from account #18679.4. This is the only amount appearing to come from Account #18679.4 which does not reflect the 25 percent pattern noted above.
- [5] This amount appears to have been received in relation to amounts IAL received from Thyssen in relation to the Bear Head Project.
- [6] A letter from Mr. Schreiber to Mr. Frank Moores dated December 27, 1995 makes reference to a loan of \$1,000,000 made by Mr. Schreiber to Mr. Moores on March 12, 1993. This loan amount corresponds to a payment made from the FRANKFURT account to Account #34107.0 on March 13, 1992.
- [7] A diary reference in Mr. Schreiber's personal diary on September 21, 1993 suggests that this amount was identified for "MARC". A partial bank document indicates there is an account #18679.5 RUBRIK "MARC". No further documents are available indicating the nature of this payment.



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## OLIPHANT COMMISSION

### Summary Schedule of Apparent Source and Use of Funds Swiss Bank Corporation, Zurich "IAL" 18679 Account #41391.0 "FRANKFURT" For the Period March 13, 1992 to July 28, 1993 [1]

	Amount (CDN \$)	
<b>APPARENT SOURCE OF FUNDS</b>		
Balance at March 13, 1992	82,940.53	5.2%
Currency transfers from account #18679.4	1,460,232.00 [2]	91.1%
Unknown	10,000.00	0.6%
Investment income	49,605.01	3.1%
	<u>1,602,777.54</u>	100.0%
 <b>APPARENT USE OF FUNDS</b>		
Account #46341.5 RUBRIK "BRITAN"	500,000.00	
Cash withdrawals	218,522.94	
Merkur Handels	94,179.06	
Account #18679.1	40,000.00	
Bank charges	6,944.78	
	<u>859,646.78</u>	
 <b>Balance July 28, 1993</b>	 <u><u>743,130.76</u></u>	

#### Notes:

[1] This schedule was prepared with reference to "FRANKFURT" bank account documents and personal diaries provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Our detailed analysis of the information provided is found in Schedule 5.

[2] This total comprises seven deposits each of which equals approximately 25 percent of a certain deposit made to account #18679.4. Each of the seven deposits to the FRANKFURT account were made a short time after the certain US Dollar deposits to account #18679.4. Further details of these transactions are included in Schedule 7.





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## OLIPHANT COMMISSION

### Summary Schedule of Apparent Source and Use of Funds

Swiss Bank Corporation, Zurich

"IAL" 18679 Account #41391.0 "FRANKFURT"

For the Period October 24, 1988 to January 22, 1990 [1]

	<u>Amount</u> <u>(CDN \$)</u>
<b>APPARENT SOURCE OF FUNDS</b>	
Opening balance at October 20, 1988	-
Transfers from Account #18679.4:	
1 deposit	658,735.00 [2]
2 deposits	20,366.63 [3]
Transfer from account #18679.1	500,000.00 [4]
Investment income	39,788.36
	<u>1,218,889.99</u>
<b>APPARENT USE OF FUNDS</b>	
BITUCAN Holdings Ltd.	610,000.00
Ticinella Anstalt	246,068.50
Cash withdrawals	201,000.00
Merkur Handels	60,014.19
Karlheinz Schreiber	47,098.76
Transfer to account #18679.1	40,000.00
Bank charges	3,148.61
	<u>1,207,330.06</u>
<b>Balance January 22, 1990</b>	<u><u>11,559.93</u></u>

#### Notes:

- [1] This schedule was prepared with reference to "FRANKFURT" bank account documents and personal diaries provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Our detailed analysis of the information provided is found in Schedule 5.
- [2] This deposit corresponds on the basis of a like amount (after conversion to US dollars using an average daily exchange rate at the time) and time to a US dollar disbursement from account #18679.4. We note that this is the only amount appearing to come from account #18679.4 which does not reflect the 25 percent pattern noted below.
- [3] This total comprises two deposits for which documents are available showing transfers were made from account #18679.4 to the FRANKFURT account. Further, the transfers made were 25 percent of certain US dollar deposits made to account #18679.4.
- [4] This amount appears to have been received in relation to amounts IAL received from Thyssen in relation to the Bear Head Project.



OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
10/20/1988	10/24/1988	Devisengeschaef (Currency transaction)		658,735.00	658,735.00	Account #18679.4
10/26/1988	10/26/1988	Fremde Geldsorten (Foreign notes and coins)	100,500.00		558,235.00	Cash withdrawal
11/2/1988	10/31/1988	Uebertrag (Transfer)		500,000.00	1,058,235.00	Account #18679.1
11/2/1988	10/31/1988	Verguetung (Payment)	610,000.00		448,235.00	BITUCAN Holdings Ltd. Account #1012-765
12/31/1988	12/31/1988	Spesen (Charges)	3.30		448,231.70	Bank charges
Total 1988			710,503.30	1,158,735.00	448,231.70	
1/[?]/1989 [2]	1/24/1989	Fremde Geldsorten (Foreign notes and coins)	40,200.00		408,031.70	Cash withdrawal
2/[?]/1989 - [2]	2/13/1989 - 5/16/1989	Verguetung (Payment)		15,311.80	423,343.50	Investment income
2/[?]/1989 - [2]	2/13/1989 - 5/16/1989	Treuhandkommission, Spesen, Solzins (Trustee commission, charge, interest)	738.94		422,604.56	Bank charges
5/[?]/1989 [2]	5/24/1989	Verguetung (Payment)	60,014.19		362,590.37	Merkur Handels Account #239 293 030
6/[?]/1989 [2]	6/16/1989	Verguetung (Payment)		4,178.97	366,769.34	Investment income
6/[?]/1989 [2]	6/16/1989	Treuhandkommission (Trustee commission)	181.69		366,587.65	Bank charges
5/[?]/1989 [2]	6/16/1989	Verguetung (Payment)	40,000.00		326,587.65	Account #18679.1 [3]
6/[?]/1989 [2]	6/29/1989	Fremde Geldsorten (Foreign notes and coins)	30,150.00		296,437.65	Cash withdrawal
7/17/1989	7/17/1989	Verguetung (Payment)		3,228.31	299,665.96	Investment income

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "LAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
6/[?]/1989 - [2] 7/17/1989	6/30/1989 - 7/17/1989	Treuhandkommission, Spesen, Sollzins (Trustee commission, charge, interest)	975.45		298,690.51	Bank charges
9/12/1989	9/12/1989	Fremde Geldsorten (Foreign notes and coins)	30,150.00		268,540.51	Cash withdrawal
9/18/1989	9/18/1989	Verguetung (Payment)		5,932.06	274,472.57	Investment income
9/18/1989	9/18/1989	Treuhandkommission (Trustee commission)	260.75		274,211.82	Bank charges
9/20/1989	9/20/1989	Devisen-verg (Currency payment)		11,719.20	285,931.02	Account #18679.4
11/20/1989	11/20/1989	Verguetung (Payment)		5,364.41	291,295.43	Investment income
11/20/1989	11/20/1989	Treuhandkommission (Trustee commission)	239.75		291,055.68	Bank charges
12/6/1989	12/6/1989	Devisen-verg (Currency payment)	23,483.50		267,572.18	Ticinella Anstalt
12/31/1989	12/31/1989	Spesen, Sollzins (Charge, interest)	494.98		267,077.20	Bank charges
Total 1989			226,889.25	45,734.75	267,077.20	
1/4/1990	1/4/1990	Devisen-verg (Currency payment)		8,647.43	275,724.63	Account #18679.4
1/18/1990	1/18/1990	Devisen-verg (Currency payment)	47,098.76		228,625.87	Freidrich Hermann Karlheinz Schreiber Account #167047
1/22/1990	1/22/1990	Verguetung (Payment)		5,772.81	234,398.68	Investment income
1/22/1990	1/22/1990	Treuhandkommission (Trustee commission)	253.75		234,144.93	Bank charges

**OLIPHANT COMMISSION**

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
1/19/1990	1/22/1990	Devisen-verg (Currency payment)	222,585.00		11,559.93	Ticinella Anstalt
3/26/1990	3/28/1990	Devisengeschaeft (Currency transaction)		219,912.00	231,471.93	Account #18679.4 [5]
4/10/1990	4/12/1990	Devisengeschaeft (Currency transaction)		111,360.00	342,831.93	Account #18679.4 [5,6]
4/30/1990 - 5/31/1990	4/30/1990 - 5/31/1990	Verguetung (Payment)		6,200.00	349,031.93	Investment income
4/30/1990 - 5/31/1990	4/30/1990 - 5/31/1990	Treuhandkommission (Trustee commission)	300.00		348,731.93	Bank charges
6/12/1990	6/12/1990	Banknoten (Bank note)	60,300.00		288,431.93	Cash withdrawal
6/29/1990 - 8/31/1990	6/29/1990 - 8/31/1990	Verguetung (Payment)		10,008.90	298,440.83	Investment income
6/29/1990 - 8/31/1990	6/29/1990 - 8/31/1990	Treuhandkommission, Spesen, Sollzins (Trustee commission, charge, interest)	1,093.54		297,347.29	Bank charges
9/7/1990	9/4/1990	Uebertrag (Transfer)		11,383.90	308,731.19	Account #18679.4 [5]
9/28/1990	9/28/1990	Verguetung (Payment)		2,815.31	311,546.50	Investment income
9/28/1990	9/28/1990	Treuhandkommission (Trustee commission)	150.00		311,396.50	Bank charges
10/8/1990	9/28/1990	Verguetung (Payment)		56,000.00	255,396.50	Account #45828.0
9/26/1990	9/28/1990	Verguetung (Payment)		210,000.00	45,396.50	Account #34107.0
12/31/1990	12/31/1990	Spesen (Charges)	6.50		45,390.00	Bank charges
Total 1990			597,787.55	376,100.35	45,390.00	
1/24/1991	1/25/1991	Verguetung (Payment)	30,000.00		15,390.00	Account #46341.2 RUBRIK FRED

**OLIPHANT COMMISSION**

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
1/23/1991	1/25/1991	Devisengeschaeft (Currency transaction)		284,745.00	300,135.00	Account #18679.4 [4,6]
2/25/1991 - 3/25/1991	2/25/1991 - 3/25/1991	Verguetung (Payment)		4,766.71	304,901.71	Investment income
2/25/1991 - 3/25/1991	2/25/1991 - 3/25/1991	Treuhandkommission (Trustee commission)	350.00		304,551.71	Bank charges
4/4/1991	4/4/1991	Auszahlung noten (Disbursement note)	100,500.00		204,051.71	Cash withdrawal
4/9/1991	4/9/1991	Uebertrag (Transfer)		115,117.22	319,168.93	Account #18679.4 [5]
4/25/1991 - 6/28/1991	4/25/1991 - 6/28/1991	Verguetung (Payment)		7,095.57	326,264.50	Investment income
4/25/1991 - 6/30/1991	4/25/1991 - 6/30/1991	Treuhandkommission, Spesen, Sollzins (Trustee commission, charge, interest)	731.30		325,533.20	Bank charges
6/14/1991	7/2/1991	Uebertrag (Transfer)		50,000.00	375,533.20	Unknown
7/2/1991	7/2/1991	Verguetung (Payment)	60,000.00		315,533.20	Account #45828.0
7/4/1991	7/3/1991	Uebertrag (Transfer)		22,563.36	338,096.56	Account #18679.4 [5]
7/4/1991	7/3/1991	Uebertrag (Transfer)		113,359.88	451,456.44	Unknown
7/31/1991 - 9/9/1991	7/31/1991 - 9/9/1991	Verguetung (Payment)		5,885.03	457,341.47	Investment income
7/31/1991 - 9/9/1991	7/31/1991 - 9/9/1991	Treuhandkommission (Trustee commission)	373.66		456,967.81	Bank charges
9/24/1991	9/24/1991	Auszahlung noten (Disbursement note)	20,100.00		436,867.81	Cash withdrawal
9/24/1991	9/24/1991	Auszahlung change (Disbursement change)	35,092.56		401,775.25	Cash withdrawal
10/9/1991 - 11/12/1991	10/9/1991 - 11/12/1991	Verguetung (Payment)		5,973.50	407,748.75	Investment income

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
10/9/1991 -	10/9/1991 -	Treuhandkommission (Trustee	380.78		407,367.97	Bank charges
11/12/1991	11/12/1991	commission)				
11/17/1991	11/12/1991	Devisengeschaef (Currency transaction)		118,243.00	525,610.97	Account #18679.4 [5]
11/18/1991	11/20/1991	Devisengeschaef (Currency transaction)		119,519.00	645,129.97	Account #18679.4 [5,6]
11/25/1991	11/27/1991	Devisengeschaef (Currency transaction)		118,650.00	763,779.97	Account #18679.4 [5,6]
12/12/1991	12/12/1991	Verguetung (Payment)		3,171.88	766,951.85	Investment income
12/12/1991	12/12/1991	Treuhandkommission (Trustee commission)	218.75		766,733.10	Bank charges
12/11/1991	12/13/1991	Devisengeschaef (Currency transaction)		119,385.00	886,118.10	Account #18679.4 [5,6]
12/12/1991	12/16/1991	Devisengeschaef (Currency transaction)		120,628.00	1,006,746.10	Account #18679.4 [5]
12/31/1991	12/31/1991	Spesen (Charges)	317.70		1,006,428.40	Bank charges
<b>Total 1991</b>			<b>248,064.75</b>	<b>1,209,103.15</b>	<b>1,006,428.40</b>	
1/8/1992	1/7/1992	Devisengeschaef (Currency transaction)		80,325.00	1,086,753.40	Account #18679.4 [5]
1/13/1992	1/13/1992	Verguetung (Payment)		4,553.44	1,091,306.84	Investment income
1/13/1992	1/13/1992	Treuhandkommission (Trustee commission)	340.44		1,090,966.40	Bank charges
2/6/1992	2/10/1992	Devisengeschaef (Currency transaction)		81,144.00	1,172,110.40	Account #18679.4 [5]
2/13/1992	2/13/1992	Verguetung (Payment)		6,159.64	1,178,270.04	Investment income
2/13/1992	2/13/1992	Treuhandkommission (Trustee commission)	469.31		1,177,800.73	Bank charges



**OLIPHANT COMMISSION**

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "LAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
2/26/1992	2/27/1992	Devisengeschaeft (Currency transaction)		126,688.00	1,304,488.73	Account #18679.4 [5,6]
2/28/1992	2/28/1992	Verguetung (Payment)	127,000.00		1,177,488.73	Account #34107.0
3/12/1992	3/13/1992	Verguetung (Payment)	1,000,000.00		177,488.73	Account #34107.0
3/11/1992	3/13/1992	Verguetung (Payment)	100,000.00		77,488.73	Account #45828.0
3/13/1992	3/13/1992	Verguetung (Payment)		5,925.87	83,414.60	Investment income
3/13/1992	3/13/1992	Treuhandkommission (Trustee commission)	474.07		82,940.53	Bank charges
3/26/1992	3/30/1992	Devisengeschaeft (Currency transaction)		123,742.50	206,683.03	Account #18679.4 [5]
6/15/1992	6/15/1992	Verguetung (Payment)		3,060.48	209,743.51	Investment income
6/15/1992	6/15/1992	Treuhandkommission (Trustee commission)	400.00		209,343.51	Bank charges
6/11/1992	6/15/1992	Devisengeschaeft (Currency transaction)		256,129.50	465,473.01	Account #18679.4 [5]
7/8/1992	7/7/1992	Devisengeschaeft (Currency transaction)		128,736.00	594,209.01	Account #18679.4 [5]
7/15/1992	7/15/1992	Verguetung (Payment)		1,490.96	595,699.97	Investment income
7/15/1992	7/15/1992	Treuhandkommission (Trustee commission)	400.00		595,299.97	Bank charges
7/23/1992	7/23/1992	Verguetung (Payment) Merkur Handels und Industrie A.G. Can-\$ 19.06 Spesen (Charges)	94,179.06		501,120.91	Merkur Handels Account #239 293 030
8/17/1992	8/17/1992	Verguetung (Payment)		2,623.45	503,744.36	Investment income
8/17/1992	8/17/1992	Treuhandkommission (Trustee commission)	272.71		503,471.65	Bank charges

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "TAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
8/20/1992	8/20/1992	Auszahlung change (Disbursement change) S.Fr. 53,300.00 Kurs 1.08 St. Margrethen	49,351.85		454,119.80	Cash withdrawal
8/21/1992	8/20/1992	Uebertrag (Transfer)	40,000.00		414,119.80	Unknown
8/24/1992	8/26/1992	Devisengeschaeft (Currency transaction)		224,485.00	638,604.80	Account #18679.4 [5]
8/26/1992	8/28/1992	Devisengeschaeft (Currency transaction)		89,100.00	727,704.80	Account #18679.4 [5,6]
9/17/1992	9/17/1992	Verguetung (Payment)		1,866.83	729,571.63	Investment income
9/17/1992 - 9/17/1992	9/17/1992	Treuhandkommission, Spesen,	847.44		728,724.19	Bank charges
9/30/1992	9/30/1992	Sollzins (Trustee commission, charge, interest)				
10/13/1992	10/15/1992	Devisengeschaeft (Currency transaction)		206,579.00	935,303.19	Account #18679.4 [5]
10/19/1992	10/19/1992	Verguetung (Payment)		2,546.64	937,849.83	Investment income
10/19/1992	10/19/1992	Treuhandkommission (Trustee commission)	324.00		937,525.83	Bank charges
11/18/1992	11/18/1992	Auszahlung noten (Disbursement note)	30,300.00		907,225.83	Cash withdrawal
11/19/1992	11/19/1992	Verguetung (Payment)		5,494.72	912,720.55	Investment income
11/19/1992	11/19/1992	Treuhandkommission (Trustee commission)	403.43		912,317.12	Bank charges
12/11/1992	12/11/1992	Uebertrag (Transfer)		10,000.00	922,317.12	Unknown
12/21/1992	12/21/1992	Verguetung (Payment)		5,752.48	928,069.60	Investment income
12/21/1992 - 12/21/1992	12/21/1992	Treuhandkommission, Spesen,	738.90		927,330.70	Bank charges
12/31/1992	12/31/1992	Sollzins (Trustee commission, charge, interest)				

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #41391.0 "FRANKFUKT"

For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
Total 1992			1,445,501.21	1,366,403.51	927,330.70	
1/21/1993	1/21/1993	Verguetung (Payment)		5,284.42	932,615.12	Investment income
1/21/1993	1/21/1993	Treuhandkommission (Trustee commission)	399.13		932,215.99	Bank charges
2/3/1993	2/3/1993	Auszahlung noten (Disbursement note) Buchs SG	75,210.00		857,005.99	Cash withdrawal
2/3/1993	2/3/1993	Auszahlung change (Disbursement change) S.Fr. 76,075.00 Kurs 1.195 Buchs SG	63,661.09		793,344.90	Cash withdrawal
2/22/1993 - 4/22/1993	2/22/1993 - 4/22/1993	Verguetung (Payment)		10,649.08	803,993.98	Investment income
2/22/1993 - 4/22/1993	2/22/1993 - 4/22/1993	Treuhandkommission, Spesen, Sollzins (Trustee commission, charge, interest)	1,732.66		802,261.32	Bank charges
5/13/1993	5/13/1993	Devisengeschaeft (Currency transaction) Kasse Verkauf US. 340,000.00 Kurs 1.269		431,460.00	1,233,721.32	Account #18679.4 [5]
5/25/1993	5/25/1993	Treuhandkommission (Trustee commission)	367.58		1,233,353.74	Bank charges
5/25/1993	5/25/1993	Verguetung (Payment)		2,845.10	1,236,198.84	Investment income
6/25/1993	6/25/1993	Treuhandkommission (Trustee commission)	532.17		1,235,666.67	Bank charges
6/25/1993	6/25/1993	Verguetung (Payment)		4,118.97	1,239,785.64	Investment income
6/25/1993	6/30/1993	Spesen (Charge)	10.51		1,239,775.13	Bank charges

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #41391.0 "FRANKFURT"

For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
7/26/1993	7/28/1993	DTA-ZAHLUNGSAUFTRAG Uebertrag (Transfer)	500,000.00		739,775.13	Account #46341.5 RUBRIK "BRITAN"
7/28/1993	7/28/1993	Verguetung (Payment)		3,871.88	743,647.01	Investment income
7/28/1993	7/28/1993	Treuhandkommission (Trustee commission)	516.25		743,130.76	Bank charges
7/29/1993	7/29/1993	Devisengeschaeft (Currency transaction) KASSE VERKAUF US. 87,500.00 KURS 1.2715		111,256.25	854,387.01	Account #18679.4 [5]
8/31/1993	8/31/1993	Verguetung (Payment)		2,280.60	856,667.61	Investment income
8/31/1993	8/31/1993	Treuhandkommission (Trustee commission)	350.86		856,316.75	Bank charges
9/28/1993	9/30/1993	Uebertrag (Transfer)	500,000.00		356,316.75	Disbursement identified as "MARC"
9/30/1993 - 10/29/1993	9/30/1993 - 10/29/1993	Verguetung (Payment)		3,828.56	360,145.31	Investment income
9/30/1993 - 10/29/1993	9/30/1993 - 10/29/1993	Treuhandkommission, Spesen, Sollzins (Trustee commission, charge, interest)	596.33		359,548.98	Bank charges
11/3/1993	11/3/1993	Auszahlung change (Disbursement change) S.FR. 76,000.00 KURS 1.1425	66,520.79		293,028.19	Cash withdrawal
11/3/1993	11/3/1993	Auszahlung noten (Disbursement note)	50,150.00		242,878.19	Cash withdrawal
11/30/1993	11/30/1993	Verguetung (Payment)		1,276.44	244,154.63	Investment income
11/30/1993	11/30/1993	Treuhandkommission (Trustee commission)	235.00		243,919.63	Bank charges
12/22/1993	12/30/1993	Uebertrag (Transfer)	240,000.00		3,919.63	Unknown

OLIPHANT COMMISSION

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
12/30/1993	12/30/1993	Verguetung (Payment)		682.43	4,602.06	Investment income
12/25/1993 -	12/30/1993 -	Treuhandkommission, Spesen,	805.72		3,796.34	Bank charges
12/31/1993	12/31/1993	Sollzins (Trustee commission, charge, interest)				
<b>Total 1993</b>			<u>1,501,088.09</u>	<u>577,553.73</u>	<u>3,796.34</u>	
3/25/1994	3/31/1994	Spesen (Charge)	4.44		3,791.90	Bank charges
<b>Total 1994</b>			<u>4.44</u>	<u>0.00</u>	<u>3,791.90</u>	
<b>Total 1988 to 1994</b>			<u>4,729,838.59</u>	<u>4,733,630.49</u>	<u>3,791.90</u>	

Notes:

- [1] This schedule was prepared with reference to bank account documents and personal diaries provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. We have excluded activity within the account which appears to be investment activity.
- [2] The day of the month is not legible based on the bank statements available.
- [3] A bank document related to the FRANKFURT account indicates this payment was made to account #18679.1. A bank document available for account #18679.1 indicates CDN\$40,000 was received into the account on June 16, 1989 and specifies an account #40391.0 as the source of the funds. Based on the timing and amount of the transaction in relation to the FRANKFURT account it appears these funds were paid from the FRANKFURT account (#41391.0) to account #18679.1.
- [4] The three amounts noted each equal approximately 25 percent of certain deposits made to account #18679.4. Bank documents for account #18679.4 are available indicating these transfers were made to the FRANKFURT account.
- [5] The 21 deposit amounts noted each equal approximately 25 percent of certain deposits made to account #18679.4. No bank documents were available to confirm the source of the 21 deposits noted. Schedule 6 provides further detailed analysis of these deposits.
- [6] Diary references in Mr. Schreiber's personal diary support the above mentioned 25 percent pattern of deposits to account #18679.4 and subsequent transfers to the FRANKFURT account.

**OLIPHANT COMMISSION**

Schedule of Account Activity in Swiss Bank Corporation, Zurich  
 "TAL" 18679 Account #41391.0 "FRANKFURT"  
 For the Period October 24, 1988 to March 31, 1994 [1]

Date of Entry	Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Balance (CDN \$)	Source/Use
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[7] A diary reference in Mr. Schreiber's personal diary on September 21, 1993 suggests that this amount was identified for "MARC". A partial bank document indicates there is an account #18679.5 RUBRIK "MARC". No further documents are available indicating the nature of this payment.



OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [U]

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Converted to US Dollars		Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Portion of 18679.4 deposits corresponding to FRANKFURT deposits		
Value Date	Amount (CDN \$)	Description (Translation to English)	Exchange Rate	Amount (US \$) [Z]	Rate	Amount (US \$) [Z]	Value Date	Amount (US \$)	Description (English translation)	%
A		B		C=A/B		D		E=C/D		
24-Oct-88	\$ 658,735.00	Devisengeschaeft (Currency Transaction)	1.2020	548,032.45			13-Oct-88	\$ 4,499,994.94	Checkabrechnung (Cheque account)	
31-Oct-88	500,000.00	Uebertrag (Transfer)					21-Oct-88	584,500.00 [3]	Gutschriftsanzeige (Credit advise)	93.8%
20-Sep-89	11,719.20	Devisen-verg (Currency Payment)	1.1836	9,901.32			31-Dec-88	7,450.00	Gutschriftsanzeige (Credit advise)	
4-Jan-90	8,647.43	Devisen-verg (Currency Payment)	1.1620	7,441.85			13-Sep-89	140,000.00	Gutschriftsanzeige (Credit advise)	
28-Mar-90	219,912.00	Devisengeschaeft (Currency Transaction)	1.1764	186,936.42			14-Sep-89	40,000.00 [4]	Gutschriftsanzeige (Credit advise)	24.8%
12-Apr-90	111,360.00	Devisengeschaeft (Currency Transaction)	1.1643	95,645.45			20-Dec-89	180,000.00	Gutschriftsanzeige (Credit advise)	
4-Sep-90	11,383.90	Uebertrag (Transfer)	1.1585	9,826.41			28-Dec-89	30,000.00 [5]	Gutschriftsanzeige (Credit advise)	24.8%
							27-Mar-90	751,000.00	Gutschriftsanzeige (Credit advise)	24.9%
							11-Apr-90	387,000.00 [6]	Gutschriftsanzeige (Credit advise)	24.7%
							24-Jul-90	40,000.00	Gutschriftsanzeige (Credit advise)	24.6%
							21-Nov-90	540,000.00 [7]	Gutschriftsanzeige (Credit advise)	



OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [1]

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Converted to US Dollars		Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Portion of 18679.4 deposits corresponding to FRANKFURT deposits
Value Date	Amount (CDN \$)	Exchange Rate	Amount (US \$) [2]	Value Date	Amount (US \$)	
A		B	C=A/B	D		E=C/D
25-Jan-91	284,745.00	1.1640	244,626.29	3-Jan-91	540,000.00 [7]	
					1,080,000.00	
				12-Dec-90	393,000.00 [8]	
				3-Jan-91	393,000.00 [8]	
				3-Jan-91	200,000.00 [8]	
					986,000.00 [9]	24.8%
				15-Mar-91	540,000.00	
9-Apr-91	115,117.22	1.1530	99,841.47	8-Apr-91	401,000.00 [10]	24.9%
2-Jul-91	50,000.00			19-Jun-91	80,000.00	24.7%
3-Jul-91	22,563.36	1.1425	19,749.11			
3-Jul-91	113,359.88			31-Jul-91	164,994.81	
				19-Aug-91	36,000.00 [11]	

OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [1]

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Converted to US Dollars		Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Portion of 18679.4 deposits corresponding to FRANKFURT deposits	
Value Date	Amount (CDN \$)	Description (Translation to English)	Exchange Rate	Amount (US \$) [2]	Value Date	Amount (US \$)	Description (English translation)	Value Date	%
A		B		C=A/B	D		E=C/D		
12-Nov-91	118,243.00	Devisengeschaeft (Currency Transaction)	1.1317	104,482.64	9-Sep-91	200,000.00	Gutschriftsanzeige (Credit advise)		
20-Nov-91	119,519.00	Devisengeschaeft (Currency Transaction)	1.1360	105,210.39	29-Oct-91	427,000.00	Gutschriftsanzeige (Credit advise)		24.5%
27-Nov-91	118,650.00	Devisengeschaeft (Currency Transaction)	1.1369	104,362.74	6-Nov-91	427,000.00 [12]	Gutschriftsanzeige (Credit advise)		24.6%
13-Dec-91	119,385.00	Devisengeschaeft (Currency Transaction)	1.1423	104,512.83	25-Nov-91	430,000.00 [13]	Gutschriftsanzeige (Credit advise)		24.3%
16-Dec-91	120,628.00	Devisengeschaeft (Currency Transaction)	1.1434	105,499.39	3-Dec-91	48,000.00 [14]	Gutschriftsanzeige (Credit advise)		
7-Jan-92	80,325.00	Devisengeschaeft (Currency Transaction)	1.1424	70,312.50	3-Dec-91	430,000.00 [14.15]	Gutschriftsanzeige (Credit advise)		24.3%
10-Feb-92	81,144.00	Devisengeschaeft (Currency Transaction)	1.1769	68,947.23	5-Dec-91	60,000.00 [14]	Gutschriftsanzeige (Credit advise)		
27-Feb-92	126,688.00	Devisengeschaeft (Currency Transaction)	1.1795	107,408.22	6-Dec-91	440,000.00	Gutschriftsanzeige (Credit advise)		
30-Mar-92	123,742.50	Devisengeschaeft (Currency Transaction)	1.1906	103,932.89	12-Dec-91	430,000.00	Gutschriftsanzeige (Credit advise)		24.5%
					18-Dec-91	280,000.00	Gutschriftsanzeige (Credit advise)		25.1%
					29-Jan-92	277,000.00	Gutschriftsanzeige (Credit advise)		24.9%
					12-Feb-92	426,000.00 [16]	Gutschriftsanzeige (Credit advise)		25.2%
					26-Mar-92	426,000.00	Gutschriftsanzeige (Credit advise)		24.4%

OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [1]

Value Date	Amount (CDN \$) A	Description (Translation to English)	Exchange Rate B	Amount (US \$) [2] C=A/B	Value Date	Amount (US \$) D	Description (English translation)	E=C/D	Portion of 18679.4 deposits corresponding to FRANKFURT deposits
		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"					Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		
		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Converted to US Dollars							
15-Jun-92	256,129.50	Devisengeschaeft (Currency Transaction)	1.1920	214,873.74	18-May-92	860,000.00	Gutschriftsanzeige (Credit advise)	25.0%	
7-Jul-92	128,736.00	Devisengeschaeft (Currency Transaction)	1.1964	107,602.81	30-Jun-92	432,000.00	Gutschriftsanzeige (Credit advise)	24.9%	
					7-Jul-92	48,000.00 [17]	Gutschriftsanzeige (Credit advise)		
					7-Jul-92	480,000.00 [17]	Gutschriftsanzeige (Credit advise)		
26-Aug-92	224,485.00	Devisengeschaeft (Currency Transaction)	1.1908	188,516.12	11-Aug-92	763,000.00	Gutschriftsanzeige (Credit advise)	24.7%	
28-Aug-92	89,100.00	Devisengeschaeft (Currency Transaction)	1.1967	74,454.75	24-Aug-92	300,000.00 [18]	Gutschriftsanzeige (Credit advise)	24.8%	
15-Oct-92	206,579.00	Devisengeschaeft (Currency Transaction)	1.2495	165,329.33	25-Sep-92	668,000.00	Gutschriftsanzeige (Credit advise)	24.7%	
11-Dec-92	10,000.00	Uebertrag (Transfer)			17-Dec-92	36,000.00	Gutschriftsanzeige (Credit advise)		
					4-Feb-93	30,000.00	Gutschriftsanzeige (Credit advise)		

OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [1]

Value Date	Amount (CDN \$) A	Description (Translation to English)	Exchange Rate B	Amount (US \$) [2] C=A/B	Value Date	Amount (US \$) D	Description (English translation)	Portion of 18679.4 deposits corresponding to FRANKFURT deposits	
									% E=C/D
13-May-93	431,460.00	Devisengeschaeft (Currency Transaction)	1.2690	340,000.00 [19]	2-Apr-93	480,000.00	Gutschriftsanzeige (Credit advise)	24.8%	
29-Jul-93	111,256.25	Devisengeschaeft (Currency Transaction)	1.2715	87,500.00 [19]	6-May-93	1,369,000.00	Gutschriftsanzeige (Credit advise)	24.7%	
					12-Jul-93	354,000.00	Gutschriftsanzeige (Credit advise)		
					20-Oct-93	480,000.00	Gutschriftsanzeige (Credit advise)		
					<b>Total</b>	<b>4,573,613.24</b>	<b>3,274,946.35 [20]</b>	<b>21,584,939.75</b>	

Notes:

- [1] This schedule was prepared with reference to bank statements and account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. See Schedules 5 and 8 for further details related to these transactions. The above analysis excludes investment income.
- [2] Deposits to the FRANKFURT account were converted to US dollars using the average daily exchange rate on the day of the deposit.
- [3] This deposit corresponds on the basis of a like amount (after conversion to US dollars using an average daily exchange rate at the time) and time to a US\$550,000 withdrawal made from account #18679.4. This is the only amount appearing to come from account #18679.4 which does not reflect the 25 percent pattern noted below.
- [4] Banking documents available indicate a transfer of US\$10,000 was made from account #18679.4 to the FRANKFURT account on September 18, 1989. This amount represents 25 percent of a US\$40,000 deposit received by account #18679.4.
- [5] Banking documents available indicate a transfer of US\$7,500 was made from account #18679.4 to the FRANKFURT account on December 27, 1989.
- [6] Mr. Schreiber's personal diary on April 10, 1990 contains the following: "387: K 193.5, F 96, M 48, St 48".
- [7] Mr. Schreiber's personal diary on January 19, 1991 contains the following: "540+540=1080-600 Pit-480/3= 160, 160".
- [8] Mr. Schreiber's personal diary on January 19, 1991 contains the following: "393+393+200=986, 1/2, 493 CAN, 246 KS, 123 Stewardess" and "246 Frankfurt".
- [9] Banking documents available indicate a transfer of US\$246,000 was made from Account 18679.4 to the FRANKFURT account on January 22, 1991. This amount represents 25 percent

OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared To Known Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 (1)

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Portion of 18679.4 deposits corresponding to FRANKFURT deposits						
Value Date	Amount (CDN \$)	Description (Translation to English)	Exchange Rate	Amount (US \$) [2]	Value Date	Amount (US \$)	Description (English translation)	Value Date	Amount (US \$)	%
A			B		D			E=C/D		

of a total of 3 deposits to account #18679.4 between December 12, 1990 and January 8, 1991.

- [10] Mr. Schreiber's personal diary on April 5, 1991 contains the following: "1383 K, 1308 M + 50 US-CAN, 204 F +100 US-CAN, 180 P US+200US, 130 JA +50US - Stewardess". Mr. Schreiber's personal diary on May 29, 1991 contains the following: "202 Kl, 100 FRA, 50 Stu, 50 Mx".
- [11] Mr. Schreiber's personal diary on September 1, 1991 contains the following: "36 IAL, 12 Stewardess, 12 Maxwell".
- [12] Mr. Schreiber's personal diary on November 16, 1991 contains the following: "427: 214, 107 Frank, 53 Maxwell, 53 Stewardess".
- [13] Mr. Schreiber's personal diary on November 24, 1991 contains the following: "430-215=215, 105, 55, 55".
- [14] Mr. Schreiber's personal diary on December 4, 1991 contains the following: "430, 48, 60".
- [15] Mr. Schreiber's personal diary on December 11, 1991 contains the following: "430-216=214-106=108".
- [16] Mr. Schreiber's personal diary on February 24, 1992 contains the following: "426 US - 213 Ca = 107 FRA + 106, 53 Maxwell in Ca, 53 Stewardess US". A further diary entry on February 27, 1992 contains the following: "Frankfurt 1,177 CA + 107 US".
- [17] Mr. Schreiber's personal diary on July 8, 1992 contains the following: "480+48=528-192=336, Stewardess 160+16=176+16=192".
- [18] Mr. Schreiber's personal diary on August 25, 1992 contains the following: "Strobl 300, 150, F 75, M 37, S 37".
- [19] Deposits to the FRANKFURT account were converted to US dollars using the exchange rate specified on the FRANKFURT bank statement.
- [20] The above total is based on our calculation of deposits to the FRANKFURT account converted to US dollars. This is an approximation based on average daily exchange rates.



OLIPHANT COMMISSION

Schedule of Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared to Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period March 30, 1992 to May 13, 1993 [1]

Value Date	Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT" Converted to US Dollars		Selected Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4		Portion of 18679.4 deposits corresponding to FRANKFURT deposits
	Amount (CDN \$) A	Description (Translation to English)	Exchange Rate B	Amount (US \$) C=A/B	Amount (US \$) D	Description (Translation to English)	
30-Mar-92	123,742.50	Devisengeschaeft (Currency Transaction)	1.1906	103,932.89	426,000.00	Gutschriftsanzeige (Credit advise)	24.4%
15-Jun-92	256,129.50	Devisengeschaeft (Currency Transaction)	1.1920	214,873.74	860,000.00	Gutschriftsanzeige (Credit advise)	25.0%
7-Jul-92	128,736.00	Devisengeschaeft (Currency Transaction)	1.1964	107,602.81	432,000.00	Gutschriftsanzeige (Credit advise)	24.9%
26-Aug-92	224,485.00	Devisengeschaeft (Currency Transaction)	1.1908	188,516.12	763,000.00	Gutschriftsanzeige (Credit advise)	24.7%
28-Aug-92	89,100.00	Devisengeschaeft (Currency Transaction)	1.1967	74,454.75	300,000.00	[B] Gutschriftsanzeige (Credit advise)	24.8%
15-Oct-92	206,579.00	Devisengeschaeft (Currency Transaction)	1.2495	165,329.33	668,000.00	Gutschriftsanzeige (Credit advise)	24.7%
13-May-93	431,460.00	Devisengeschaeft (Currency Transaction)	1.2690	340,000.00	1,369,000.00	Gutschriftsanzeige (Credit advise)	24.8%
	<u>1,460,232.00</u>			<u>1,194,709.65</u>	<u>4,818,000.00</u>		
11-Dec-92	10,000.00	Uebertrag (Transfer)					
	<u>1,470,232.00</u>						

OLIPHANT COMMISSION

Schedule of Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"  
 Compared to Certain Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 For the Period March 30, 1992 to May 13, 1993 [1]

Value Date	Amount (CDN \$)	Description (Translation to English)	Exchange Rate	Amount (US \$)	Date	Amount (US \$)	Description (Translation to English)	Portion of 18679.4 deposits corresponding to FRANKFURT deposits
	A		B	C=A/B	[2]	D		E=C/D
		Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #41391.0 "FRANKFURT"					Selected Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4	

Notes:

- [1] This schedule was prepared with reference to bank statements and account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 2 to the Navigant Report. Further detail related to these transactions is available in Schedules 5 and 8.
- [2] Deposits to the FRANKFURT account were converted to US dollars using the average daily exchange rate on the day of the deposit.
- [3] Mr. Schreiber's personal diary on August 25, 1992 contains the following: "Strobl 300, 150, F 75, M 37, S 37".
- [4] Deposit to the FRANKFURT account was converted to US dollars using the exchange rate specified on the FRANKFURT bank statement.





OLIPHANT COMMISSION

Schedule of Known Deposits to Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [X]

Value Date	Description (English translation)	Originating Financial Institution	Note/Reference	Amount (US \$)	Source of Funds
13-Oct-88	Cheque	unknown (PO-8 280 076 002)		\$ 4,499,994.94	Kensington Anstalt Account #235.971.021 [2]
21-Oct-88	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		584,500.00	Kensington Anstalt Account #235.971.021 [2]
				<u>5,084,494.94</u>	
13-Sep-89	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		140,000.00	IAL Account #235.972.037 [2]
14-Sep-89	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		40,000.00	[3] IAL Account #235.972.037 [2]
20-Dec-89	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		180,000.00	IAL Account #235.972.037 [2]
28-Dec-89	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		30,000.00	[3] IAL Account #235.972.037 [2]
27-Mar-90	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/IAL International Aircraft, Vaduz	751,000.00	[3] IAL Account #235.972.037 [2]
11-Apr-90	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. Int. Aircraft Leasing Ltd. 9490 Vaduz	387,000.00	[3] IAL Account #235.972.037 [2]
24-Jul-90	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. Intern. Aircraft Leasing Ltd. 9490 Vaduz	40,000.00	[3] IAL Account #235.972.037 [2]
21-Nov-90	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. International Aircraft Vaduz	540,000.00	IAL Account #235.972.037 [2]
3-Jan-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. International Aircraft Vaduz	540,000.00	IAL Account #235.972.037 [2]
12-Dec-90	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz		393,000.00	[4] IAL Account #235.972.037 [2]

OLIPHANT COMMISSION

Schedule of Known Deposits to Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #18679.4

For the Period October 13, 1988 to October 20, 1993 [1]

Value Date	Description (English translation)	Originating Financial Institution	Note/Reference	Amount (US \$)	Source of Funds
3-Jan-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. International Aircraft, Vaduz	393,000.00	[4] IAL Account #235.972.037 [2]
3-Jan-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. International Aircraft, Vaduz	200,000.00	[4] IAL Account #235.972.037 [2]
15-Mar-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L.A.L. International Aircraft Leasing Limited 9490 Vaduz	540,000.00	IAL Account #235.972.037 [2]
8-Apr-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/LAL International Aircraft Leasing Limited 9490 Vaduz	401,000.00	[3] IAL Account #235.972.037 [2]
19-Jun-91	Gutschriftsanzeige (Credit advise)	VPBank Post Box 885 - 9490 Vaduz	O/L A L International A L Ltd Vaduz	80,000.00	[3] IAL Account #235.972.037 [2]
				4,655,000.00	
19-Aug-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York	International Aircraft Leasing	36,000.00	Unknown - SBC New York
9-Sep-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York	Ref: International Aircraft Leasing Ltd	200,000.00	Unknown - SBC New York
24-Oct-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		427,000.00	[3] Unknown - SBC New York
6-Nov-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		427,000.00	[3] Unknown - SBC New York
25-Nov-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		430,000.00	[3] Unknown - SBC New York
3-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		48,000.00	Unknown - SBC New York

**OLIPHANT COMMISSION**

Schedule of Known Deposits to Swiss Bank Corporation, Zurich  
 "IAL" 18679 Account #18679.4  
 For the Period October 13, 1988 to October 20, 1993 [U]

Value Date	Description (English translation)	Originating Financial Institution	Note/Reference	Amount (US \$)	Source of Funds
3-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		430,000.00	[3] Unknown - SBC New York
5-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		60,000.00	Unknown - SBC New York
6-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		440,000.00	Unknown - SBC New York
12-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		430,000.00	[3] Unknown - SBC New York
18-Dec-91	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		280,000.00	[3] Unknown - SBC New York
29-Jan-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		277,000.00	[3] Unknown - SBC New York
12-Feb-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York	Ref: IAL	426,000.00	[3] Unknown - SBC New York
26-Mar-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		426,000.00	[3] Unknown - SBC New York
13-Apr-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		480,000.00	Unknown - SBC New York
23-Apr-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		480,000.00	Unknown - SBC New York
11-May-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		36,000.00	Unknown - SBC New York
11-May-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		40,000.00	Unknown - SBC New York
18-May-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		860,000.00	[3] Unknown - SBC New York

**OLIPHANT COMMISSION**

**Schedule of Known Deposits to Swiss Bank Corporation, Zurich**

"IAL" 18679 Account #18679.4

For the Period October 13, 1988 to October 20, 1993 [1]

Value Date	Description (English translation)	Originating Financial Institution	Note/Reference	Amount (US \$)	Source of Funds
30-Jun-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		432,000.00 [3]	Unknown - SBC New York
7-Jul-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		48,000.00	Unknown - SBC New York
7-Jul-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		480,000.00	Unknown - SBC New York
11-Aug-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		763,000.00 [3]	Unknown - SBC New York
24-Aug-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		300,000.00 [3]	Unknown - SBC New York
25-Sep-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		668,000.00 [3]	Unknown - SBC New York
17-Dec-92	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		36,000.00	Unknown - SBC New York
4-Feb-93	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		30,000.00	Unknown - SBC New York
2-Apr-93	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		480,000.00	Unknown - SBC New York
6-May-93	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		1,369,000.00 [3]	Unknown - SBC New York
12-Jul-93	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		354,000.00 [3]	Unknown - SBC New York
20-Oct-93	Gutschriftsanzeige (Credit advise)	Swiss Bank Corporation New York		480,000.00	Unknown - SBC New York
				<u>11,673,000.00</u>	

**OLIPHANT COMMISSION**

**Schedule of Known Deposits to Swiss Bank Corporation, Zurich**

"IAL" 18679 Account #18679.4

For the Period October 13, 1988 to October 20, 1993 [4]

Value Date	Description (English translation)	Originating Financial Institution	Note/Reference	Amount (US \$)	Source of Funds
31-Dec-88	Gutschriftsanzeige (Credit advise)			7,450.00	Account #18679.0
31-Jul-91	Checkabrechnung 2884 (Cheque account)	PO - 1 206 075 048		164,994.81	Unknown
				<u>172,444.81</u>	
				<u><u>21,584,939.75</u></u>	

**Notes:**

- [1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. As no bank statements were provided for this account, we are unable to determine the completeness of the transactions noted.
- [2] The source of the funds deposited to account #18679.4 is known based on bank documents related to IAL account #235.972.037 and Kensington account #235.971.021. The Commission obtained these documents from Mr. Georgio Felossi and Ms. Stevie Cameron via the DOJ. Further details are found in Schedule 9.
- [3] For each of the 23 deposits noted, a subsequent deposit was made to the FRANKFURT account amounting to approximately 25 percent of the noted deposit to account #18679.4. Schedule 6 provides further detailed analysis of the deposits in question.
- [4] The three deposits noted total US\$986,000. We note one deposit amounting to approximately 25 percent of this amount was made to the FRANKFURT account subsequent to the three noted deposits. Schedule 6 provides further detailed analysis of the deposits in question.



OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 Compared to Withdrawals from Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 6, 1988 to June 21, 1991

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 [1]		Withdrawals from Verwaltungs Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 [2]			
Value Date	Amount (US \$)	Description (Translation to English)	Value Date	Amount (US \$)	Description (Translation to English) to English Institution
13-Oct-88	4,499,994.94	Checkabrechnung (Cheque account)	5-Oct-88	4,500,000.00	Ueberweis (transfer) Kensington Anstalt (235.971.021) [3]
21-Oct-88	584,500.00	Gutschriftsanzeige (Credit advise)	21-Oct-88	584,500.00	Ueberweis (transfer) Kensington Anstalt (235.971.021) [4]
	5,084,494.94			5,084,500.00	
13-Sep-89	140,000.00	Gutschriftsanzeige (Credit advise)	12-Sep-89	140,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich
14-Sep-89	40,000.00 [5]	Gutschriftsanzeige (Credit advise)	12-Sep-89	40,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich
20-Dec-89	180,000.00	Gutschriftsanzeige (Credit advise)	18-Dec-89	180,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich Rubrik IAL
28-Dec-89	30,000.00 [5]	Gutschriftsanzeige (Credit advise)	22-Dec-89	30,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich Rubrik IAL
27-Mar-90	751,000.00 [5]	Gutschriftsanzeige (Credit advise)	23-Mar-90	751,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich Rubrik IAL
11-Apr-90	387,000.00 [5]	Gutschriftsanzeige (Credit advise)	11-Apr-90	387,000.00	Ueberweis (transfer) 18679 SBV, Zurich Rubrik IAL
24-Jul-90	40,000.00 [5]	Gutschriftsanzeige (Credit advise)	20-Jul-90	40,000.00	Ueberweis (transfer) Nr. 18679 SBV, Zurich IAL
21-Nov-90	540,000.00	Gutschriftsanzeige (Credit advise)	19-Nov-90	540,000.00	Ueberweis (transfer) 18679 SBV, Zurich Rubrik IAL
3-Jan-91	540,000.00	Gutschriftsanzeige (Credit advise)	3-Jan-91	540,000.00	Ueberweis (transfer) Nr. 18679 Rubrik I.A.L. SBV, Zuerich
12-Dec-90	393,000.00 [5]	Gutschriftsanzeige (Credit advise)	6-Dec-90	393,000.00	Ueberweis (transfer) 18679 SBV, Zuerich Rubrik IAL



OLIPHANT COMMISSION

Schedule of Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4  
 Compared to Withdrawals from Verwaltungen Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 6, 1988 to June 21, 1991

Deposits to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 [1]		Withdrawals from Verwaltungen Und Privat Bank, Vaduz, Liechtenstein, I.A.L. International Aircraft Leasing Limited Account #235.972.037 [2]			
Value Date	Amount (US \$)	Description (Translation to English)	Amount (US \$)	Description (Translation to English)	Destination Account and Financial Institution
3-Jan-91	393,000.00	[5] Gutschriftsanzeige (Credit advise)	393,000.00	Ueberweisg (transfer)	18679 Rubrik I.A.L. SBV, Zuerich
3-Jan-91	200,000.00	[5] Gutschriftsanzeige (Credit advise)	200,000.00	Ueberweisg (transfer)	Nr. 18679 Rubrik I.A.L. SBV, Zuerich
15-Mar-91	540,000.00	Gutschriftsanzeige (Credit advise)	540,000.00	Ueberweisg (transfer)	18679 SBV, Zuerich
8-Apr-91	401,000.00	[5] Gutschriftsanzeige (Credit advise)	401,000.00	Ueberweisg (transfer)	18679 SBV, Zuerich
19-Jun-91	80,000.00	[5] Gutschriftsanzeige (Credit advise)	80,000.00	Ueberweisg (transfer)	18679 Rubrik I.A.L. SBV, Zuerich
	<u>4,655,000.00</u>		<u>4,655,000.00</u>		
Total	<u>9,739,494.94</u>		<u>9,739,500.00</u>		

Notes:

- [1] Prepared with reference to bank documents related to Swiss Bank Corporation, Zurich, "IAL" 18679 Account #18679.4 provided by Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report.
- [2] Prepared with reference to bank documents related to Verwaltungen Und Privat Bank, Vaduz, Liechtenstein, International Aircraft Leasing Limited account #235.972.037. The Commission obtained bank documents related to these accounts from Mr. Giorgio Pelossi and Ms. Stevie Cameron via the DOJ.
- [3] Amount was transferred to Kensington account 235.971.021 and a cheque was issued for the same amount from that account. The same cheque (#103992814) was deposited to IAL Swiss Bank Corporation account #18679.4 on October 13, 1988 (less a service fee of US\$5.06)
- [4] Amount appears to be transferred to Kensington Anstalt account #235.971.021 and then to an SBV, Zurich account #18679.4.
- [5] The above noted amounts have a corresponding 25 percent deposit to the FRANKFURT account, as detailed in Schedule 6.



**OLIPHANT COMMISSION**

**Schedule of Known Withdrawal Activity in Swiss Bank Corporation, Zurich**

**"IAL" 18679 Account #18679.4**

**For the Period October 6, 1988 to November 28, 1994 [1]**

<b>Date</b>	<b>Description (Translation to English)</b>	<b>Debit (US \$)</b>	<b>Source/Use</b>
10/6/1988	Belastungsanzeige (Debit advise)	\$ 4,000,006.38	Karlheinz Schreiber Account #138 313.3 or #511618
10/13/1988	Belastungsanzeige (Debit advise)	250,000.00	Account #18679.7 RUBR."MASTER"
10/13/1988	Devisengeschaeft (Currency transaction)	250,000.00	Unknown
10/21/1988	Uebertrag (Transfer)	11,000.00	Unknown
10/21/1988	Devisen-verg. (Currency payment)	23,500.00	Account #18679.7 RUBR."MASTER"
10/24/1988	Devisengeschaeft (Currency transaction)	550,000.00	Account #41391.0 "FRANKFURT" [2]
<b>Total 1988</b>		<b>5,084,506.38</b>	
9/15/1989	Uebertrag (Transfer)	46,000.00	Account #18679.6 "Steiger"
9/15/1989	Belastungsanzeige (Debit Advice)	46,000.00	Account #18679.7 RUBR."MASTER"
9/20/1989	Uebertrag (Transfer)	5,000.00	Account #18679.7 "Master"
9/20/1989	Uebertrag (Transfer)	5,000.00	Account #18679.6 "Steiger"
9/20/1989	Belastungsanzeige (Debit Advice)	10,000.00	Account #41391.0 "FRANKFURT"
<b>Total 1989</b>		<b>112,000.00</b>	
1/4/1990	Uebertrag (Transfer)	3,750.00	Account #18679.6 "Steiger"
1/4/1990	Uebertrag (Transfer)	3,750.00	Account #18679.7 "Master"
1/4/1990	Belastungsanzeige (Debit Advice)	15,000.00	Account #18679.1
1/4/1990	Uebertrag (Transfer)	7,500.00	Account #41391.0 "FRANKFURT"
3/28/1990		187,750.00	Account #41391.0 "FRANKFURT" [3]
4/12/1990		96,750.00	Account #41391.0 "FRANKFURT" [3]
4/11/1990	Auszahlung Zulasten Von (Disbursement debit)	105,353.54	Cash withdrawal
4/11/1990	Auszahlung Zulasten Von (Disbursement debit)	40,816.33	Cash withdrawal

## OLIPHANT COMMISSION

### Schedule of Known Withdrawal Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #18679.4

For the Period October 6, 1988 to November 28, 1994 [1]

Date	Description (Translation to English)	Debit (US \$)	Source/Use	
4/12/1990	Belastungsanzeige (Debit Advice)	40,000.00	Merkur Industries Account #239 293 021	
4/17/1990	Belastungsanzeige (Debit Advice)	10,000.00	IAL Account #235 972 037	
6/11/1990	Checkbestellung (Cheque order)	495,283.02	Bayerische Bitumen-Chemie	[4]
9/4/1990		10,000.00	Account #41391.0 "FRANKFURT"	[3]
10/3/1990	Auszahlung Zulasten Von (Disbursement debit)	65,503.88	Cash withdrawal	
11/19/1990	Auszahlung Zulasten Von (Disbursement debit)	206,098.55	Cash withdrawal	
<b>Total 1990</b>		<b>1,287,555.32</b>		
1/23/1991	Auszahlung Zulasten Von (Disbursement debit)	44,400.00	Cash withdrawal	
1/23/1991	Auszahlung Zulasten Von (Disbursement debit)	68,000.00	Cash withdrawal	
1/24/1991	Uebertrag (Transfer)	246,000.00	Account #41391.0 "FRANKFURT"	
1/22/1991	Uebertrag (Transfer)	100,603.62	Account #46341.1 "Jurglund"	[4]
1/22/1991	Uebertrag (Transfer)	160,000.00	Account #18679.7 "Maxwell"	
1/22/1991	Uebertrag (Transfer)	123,000.00	Account #18679.7 "Maxwell"	
1/22/1991	Uebertrag (Transfer)	160,000.00	Account #18679.6 "Steiger" = new "Stewardess"	
1/22/1991	Uebertrag (Transfer)	123,000.00	Account #18679.6 "Steiger" = new "Stewardess"	
4/9/1991		100,250.00	Account #41391.0 "FRANKFURT"	[3]
7/3/1991		20,000.00	Account #41391.0 "FRANKFURT"	[3]
7/24/1991	Auszahlung Zulasten Von (Disbursement debit)	57,940.20	Cash withdrawal	
11/12/1991		106,750.00	Account #41391.0 "FRANKFURT"	[3]
11/20/1991		106,750.00	Account #41391.0 "FRANKFURT"	[3]
11/27/1991		107,500.00	Account #41391.0 "FRANKFURT"	[3]
12/13/1991		107,500.00	Account #41391.0 "FRANKFURT"	[3]
12/16/1991		107,500.00	Account #41391.0 "FRANKFURT"	[3]

**OLIPHANT COMMISSION**

**Schedule of Known Withdrawal Activity in Swiss Bank Corporation, Zurich**

**"IAL" 18679 Account #18679.4**

**For the Period October 6, 1988 to November 28, 1994 [1]**

<b>Date</b>	<b>Description (Translation to English)</b>	<b>Debit (US \$)</b>	<b>Source/Use</b>	
<b>Total 1991</b>		<b>1,739,193.82</b>		
1/7/1992		70,000.00	Account #41391.0 "FRANKFURT"	[3]
2/10/1992		69,250.00	Account #41391.0 "FRANKFURT"	[3]
2/27/1992		106,500.00	Account #41391.0 "FRANKFURT"	[3]
3/30/1992		106,500.00	Account #41391.0 "FRANKFURT"	[3]
3/26/1992	Devisen-Abrechnung (Currency Statement)	131,868.13	Account #18679.0	
4/28/1992	Auszahlung Zulasten Von (Disbursement debit)	122,782.72	Cash withdrawal	
4/28/1992	Auszahlung Zulasten Von (Disbursement debit)	13,253.81	Cash withdrawal	
6/15/1992		215,000.00	Account #41391.0 "FRANKFURT"	[3]
7/7/1992		108,000.00	Account #41391.0 "FRANKFURT"	[3]
7/3/1992	Auszahlung Zulasten Von (Disbursement debit)	20,411.99	Cash withdrawal	
7/3/1992	Auszahlung Zulasten Von (Disbursement debit)	67,585.69	Cash withdrawal	
7/7/1992	Belastungsanzeige (Debit Advice)	33,710.39	Kensington Account #235 971 013	
7/7/1992	Belastungsanzeige (Debit Advice)	15,003.75	Kensington Account #235 971 013	
8/26/1992		190,750.00	Account #41391.0 "FRANKFURT"	[3]
8/28/1992		75,000.00	Account #41391.0 "FRANKFURT"	[3]
8/27/1992	Belastungsanzeige (Debit Advice)	3,008.88	Franko Commercial Account #160 200	
10/15/1992		167,000.00	Account #41391.0 "FRANKFURT"	[3]
10/13/1992	Belastungsanzeige (Debit Advice)	239,293.49	Pagani & Wullschleger	
<b>Total 1992</b>		<b>1,754,918.85</b>		
5/13/1993		340,000.00	Account #41391.0 "FRANKFURT"	[3]
7/29/1993		87,500.00	Account #41391.0 "FRANKFURT"	[3]
<b>Total 1993</b>		<b>427,500.00</b>		

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## OLIPHANT COMMISSION

### Schedule of Known Withdrawal Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #18679.4

For the Period October 6, 1988 to November 28, 1994 [1]

Date	Description (Translation to English)	Debit (US \$)	Source/Use
11/22/1994	Belastungsanzeige (Debit Advice)	15,319.80	Kensington Account #235 971 013
11/22/1994	Belastungsanzeige (Debit Advice)	404,936.37	Kensington Account #235 971 048
11/28/1994	Belastungsanzeige (Debit Advice)	3,743,000.00	Account #56129.3
<b>Total 1994</b>		<b>4,163,256.17</b>	
<b>Total 1988 to 1994</b>		<b><u>14,568,930.54</u></b>	

#### Notes:

- [1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. As no bank statements were provided for this account, we are unable to determine the completeness of the transactions noted.
- [2] This disbursement has a like amount (after conversion to CDN using an average daily exchange rate at the time) and time to a Canadian dollar (CDN\$658,735) deposit to the FRANKFURT account. We note that this is the only withdrawal appearing to go to the FRANKFURT account which does not reflect the 25 percent pattern noted below.
- [3] These amounts are calculated based on 25 percent of certain deposits to account #18679.4. Based on the analysis set out in Schedule 6, these amounts appear to have been transferred to the FRANKFURT account. No bank documents were available to confirm these transfers were made.
- [4] The amounts noted on the withdrawal instructions was noted in Deutsche Marks. We converted these amount to US dollars using the average exchange rate on the dates noted on the withdrawal instructions.



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## OLIPHANT COMMISSION

### Summary of Apparent Source and Use of Funds

Verwaltungs Und Privat Bank, Vaduz, Liechtenstein

I.A.L. International Aircraft Leasing Limited Account #235.972.037

For the Period October 3, 1988 to June 30, 1991 [1]

APPARENT SOURCE OF FUNDS	Amount (US \$)	
Balance as at October 3, 1988	-	
Banque Francaise Du Commerce Exterieur, Paris	10,826,993.02	99.2%
Liecht. Landesbank	40,000.00	0.4%
SBV, Zuerich	10,000.00	0.1%
Kensington Anstalt	4,968.94	0.0%
Investment income	28,648.73	0.3%
Unknown	163.00	0.0%
	<u>10,910,773.69</u>	100.0%
 <b>APPARENT USE OF FUNDS</b>		
Kensington Anstalt VP Bank a/c #235.971.021	5,084,500.00	[2]
Kensington Anstalt VP Bank a/c #235.971.013	35,000.00	
"IAL" 18679 account #18679.4	4,655,000.00	
Erfel Anstalt	826,640.00	
Bank Charges	71.14	
Unknown	84,745.92	
Excess of documented sources over uses of funds	55,918.63	[3]
	<u>10,741,875.69</u>	
 <b>Balance in account as at June 30, 1991</b>	 <u><u>168,898.00</u></u>	

#### Notes:

- [1] Bank statements for the period October 3, 1988 to June 30, 1989 are not available. Our analysis for these periods is based on available information from transfer slips and daily transaction statements. Prepared with reference to bank documents related to IAL account #235.972.037. The Commission obtained bank documents related to this account from Mr. Georgio Pelossi and Ms. Stevie Cameron via the DOJ. Our detailed analysis of the information provided is available in Schedule 13.
- [2] Documentation available suggests that the payments to Kensington account #235.971.021 in turn are transferred to account #18679.4.
- [3] The above noted amount is the difference between the documented deposits and disbursements from IAL account #235.972.037 between October 3, 1988 and June 30, 1989.





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## OLIPHANT COMMISSION

Schedule of Deposits to Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
I.A.L. International Aircraft Leasing Limited Account #235.972.037  
from Banque Francaise Du Commerce Exterieur, Paris  
For the Period October 3, 1988 to June 28, 1991 [1]

Date	Value Date	Description (Translation to English)	Amount (US \$)
10/3/1988		Ueberweisg Banque Francaise (Transfer order)	100,000.00
10/5/1988	10/5/1988	Ueberweisg Banque Francaise (Transfer order)	5,000,000.00
10/18/1988		Ueberweisg Bque. Francaise (Transfer order)	88,000.00
			5,188,000.00 [2]
9/1/1989	9/4/1989	Ueberweisg Banque Francaise (Transfer order)	140,000.00
11/28/1989	11/29/1989	Ueberweisg Banque Francaise (Transfer order)	30,000.00
12/12/1989	12/13/1989	Ueberweisg Banque Francaise (Transfer order)	180,000.00
			350,000.00 [2]
2/13/1990	2/14/1990	Ueberweisg Bqu. Francaise Comm. (Transfer order)	366,000.00
2/28/1990	3/1/1990	Ueberweisg Banque Francaise (Transfer order)	385,000.00
3/26/1990	3/27/1990	Ueberweisg Bque. Franc. Comm. (Transfer order)	387,000.00
5/22/1990	5/23/1990	Ueberweisg Banque Francaise (Transfer order)	40,000.00
6/29/1990	7/2/1990	Ueberweisg Banque Franc. D. Comm. (Transfer order)	50,000.00
7/16/1990	7/16/1990	Ueberweisg Banque Francaise (Transfer order)	276,000.00
8/14/1990	8/15/1990	Ueberweisg Banque Francaise (Transfer order)	140,000.00

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## OLIPHANT COMMISSION

Schedule of Deposits to Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
I.A.L. International Aircraft Leasing Limited Account #235.972.037  
from Banque Francaise Du Commerce Exterieur, Paris  
For the Period October 3, 1988 to June 28, 1991 [1]

Date	Value Date	Description (Translation to English)	Amount (US \$)
10/24/1990	10/25/1990	Ueberweisg Banque Francaise (Transfer order)	540,000.00
11/19/1990	11/20/1990	Ueberweisg Banque Francaise (Transfer order)	540,000.00
11/26/1990	11/27/1990	Ueberweisg Banque Francaise (Transfer order)	60,000.00
11/26/1990	11/27/1990	Ueberweisg Banque Francaise (Transfer order)	393,000.00
12/4/1990	12/5/1990	Ueberweisg (Transfer order)	393,000.00
12/7/1990	12/10/1990	Ueberweisg Banque Francaise (Transfer order)	540,000.00
			4,110,000.00 [2]
1/15/1991	1/15/1991	Ueberweisg Banq. Franc. Du. Comm. (Transfer order)	80,000.00
1/16/1991	1/16/1991	Ueberweisg Banq. Franc. Du. Comm. (Transfer order)	48,000.00
2/15/1991	2/15/1991	Ueberweisg Banq. Francaise, Paris (Transfer order)	401,000.00
3/11/1991	3/8/1991	Ueberweisg Banq. Franc. Du. Comm. (Transfer order)	401,993.02
5/31/1991	6/3/1991	Ueberweisg Banq. Franc. Du. Comm. (Transfer order)	80,000.00
6/28/1991	6/28/1991	Ueberweisg Banque Francaise (Transfer order)	168,000.00
			1,178,993.02 [2]
			<u>10,826,993.02</u>

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## OLIPHANT COMMISSION

Schedule of Deposits to Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
I.A.L. International Aircraft Leasing Limited Account #235.972.037  
from Banque Francaise Du Commerce Exterieur, Paris  
For the Period October 3, 1988 to June 28, 1991 [1]

<u>Date</u>	<u>Value Date</u>	<u>Description (Translation to English)</u>	<u>Amount (US \$)</u>
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**Notes:**

- [1] Bank statements for the period October 3, 1988 to June 28, 1989 are not available. Our analysis for the period is based on available information from transfer slips. Prepared with reference to bank documents related to IAL account #235.972.037. The Commission obtained bank documents related to this account from Mr. Georgio Pelossi and Ms. Stevie Cameron via the DOJ. Further detail regarding IAL account #235.972.037 is provided in Schedule 13.
- [2] These amounts match a listing provided by Mr. Karlheinz Schreiber detailing amounts IAL received from Airbus by year between 1988 and June 30, 1991.
- [3] Bank documents available for the above noted transaction indicate the amount was received from Banque Francaise Du Commerce Exterieur.



**OLIPHANT COMMISSION**

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
10/3/1988		Ueberweisg Banque Francaise (Transfer order)		100,000.00	100,000.00	Banque Francaise Du Commerce [2]
10/5/1988	10/5/1988	Ueberweisg Banque Francaise (Transfer order)		5,000,000.00	5,100,000.00	Banque Francaise Du Commerce [2]
10/5/1988	10/5/1988	Ueberweisung Kensington Anstalt (Transfer order)	4,500,000.00			Kensington Anstalt Account #235.971.021 [2]
10/7/1988		Scheck #103992831	12,500.00			Unknown [2,5]
10/7/1988		Spesen (charges)	6.37			Bank charges [2]
10/18/1988		Ueberweisg Bque. Francaise (Transfer order)		88,000.00		Banque Francaise Du Commerce [2]
10/19/1988	10/21/1988	Belastungsanzeige (Debit advise)	584,500.00			Kensington Anstalt Account #235.971.021 [2]
10/21/1988	10/21/1988	Belastungsanzeige (Debit advise)	35,000.00			Kensington Anstalt Account #235.971.013 [2]
<b>Total 1988</b>			<b>5,132,006.37</b>	<b>5,188,000.00</b>		
6/30/1989	6/30/1989	Vortrag (balance carried forward)			75.00	
8/17/1989	8/18/1989	Ueberweisg Liecht. Landesbank (Transfer order)		40,000.00	40,075.00	Liecht. Landesbank
8/24/1989	8/28/1989	Devisen Korrent SFR (Foreign currency)			35,075.00	Unknown
9/1/1989	9/4/1989	Ueberweisg Banque Francaise (Transfer order)		140,000.00	175,075.00	Banque Francaise Du Commerce
9/12/1989	9/14/1989	Ueberweisg Kensington Anstalt (Transfer order)		4,968.94	180,043.94	Kensington Anstalt unknown account

**OLIPHANT COMMISSION**

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
9/12/1989	9/12/1989	Ueberweisg SBV Zuerich (Transfer order)	40,000.00		140,043.94	Account #18679.4 [3]
9/12/1989	9/12/1989	Ueberweisg SBV Zuerich (Transfer order)	140,000.00		43.94	Account #18679.4 [3]
11/28/1989	11/29/1989	Ueberweisg Banque Francaise (Transfer order)		30,000.00	30,043.94	Banque Francaise Du Commerce
12/12/1989	12/13/1989	Ueberweisg Banque Francaise (Transfer order)		180,000.00	210,043.94	Banque Francaise Du Commerce
12/12/1989	12/18/1989	Ueberweisg SBV Zuerich (Transfer order)	180,000.00		30,043.94	Account #18679.4 [3]
12/22/1989	12/22/1989	Ueberweisg (Transfer order)	30,000.00		43.94	Account #18679.4 [3]
12/31/1989	12/31/1989	Umsatzkomm	195.00		-151.06	Unknown
12/31/1989	12/31/1989	Sollzins (Debit interest)	3.30		-154.36	Bank Charges
12/31/1989	12/31/1989	Porti / SPS (Postage)	8.64		-163.00	Bank Charges
1/10/1990	12/31/1989	Devisen Korrent SFR (Foreign currency)		163.00	0.00	Unknown
<b>Total 1989</b>			<b>395,206.94</b>	<b>395,131.94</b>	<b>0.00</b>	
2/13/1990	2/14/1990	Ueberweisg Bqu. Francaise Commun. (Transfer order)		366,000.00	366,000.00	Banque Francaise Du Commerce
2/28/1990	3/1/1990	Ueberweisg Banque Francaise (Transfer order)		385,000.00	751,000.00	Banque Francaise Du Commerce
3/23/1990	3/23/1990	Ueberweisg Schweiz. Bankverein (Transfer order)	751,000.00		0.00	Account #18679.4 [3]

**OLIPHANT COMMISSION**

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
3/26/1990	3/27/1990	Ueberweisg Bque. Franc. Comm. (Transfer order)		387,000.00	387,000.00	Banque Francaise Du Commerce
4/9/1990	4/11/1990	Ueberweisg Schweiz. Bankverein (Transfer order)	387,000.00		0.00	Account #18679.4 [3]
4/2/1990	3/31/1990	Zinsen Konto at Call US\$ (interest account)		4,503.00	4,503.00	Investment income
4/9/1990	4/11/1990			859.93	5,362.93	Investment income [4]
4/10/1990	4/11/1990	Devisen Korrent SFR (Foreign currency)	2,000.00		3,362.93	Unknown
4/18/1990	4/19/1990	Ueberweisg SBV Zuerich (Transfer order)		10,000.00	13,362.93	SBV, Zuerich
5/22/1990	5/23/1990	Ueberweisg Banque Francaise (Transfer order)		40,000.00	53,362.93	Banque Francaise Du Commerce
6/29/1990	7/2/1990	Ueberweisg Banque Franc. D. Comm. (Transfer order)		50,000.00	103,362.93	Banque Francaise Du Commerce
6/29/1990	6/29/1990	Ueberweisg (Transfer order)	8,721.43		94,641.50	Unknown
6/30/1990	6/30/1990	Umsatzkomm	357.20		94,284.30	Unknown
6/30/1990	6/30/1990	Porti / SPS (Postage)	14.30		94,270.00	Bank Charges
7/2/1990	6/30/1990	Zinsen Konto at Call US\$ (Interest account)		342.30	94,612.30	Investment income
7/16/1990	7/16/1990	Ueberweisg Banque Francaise (Transfer order)		276,000.00	370,612.30	Banque Francaise Du Commerce
7/20/1990	7/20/1990	Ueberweisg SBV Zuerich (Transfer order)	40,000.00		330,612.30	Account #18679.4 [3]



OLIPHANT COMMISSION

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
8/14/1990	8/15/1990	Ueberweisg Banque Francaise (Transfer order)		140,000.00	470,612.30	Banque Francaise Du Commerce
8/16/1990	8/16/1990	Ueberweisg Erfel Anstalt (Transfer order)	200,000.00		270,612.30	Erfel Anstalt
8/16/1990	8/20/1990	Devisen Korrent SFR (Foreign currency)	4,000.00		266,612.30	Unknown
9/24/1990	9/24/1990	Ueberweisg Erfel Anstalt (Transfer order)	100,000.00		166,612.30	Erfel Anstalt
10/11/1990	9/30/1990	Zinsen Konto at Call US\$ (Interest account)		4,250.70	170,863.00	Investment income
10/24/1990	10/25/1990	Ueberweisg Banque Francaise (Transfer order)		540,000.00	710,863.00	Banque Francaise Du Commerce
10/30/1990	11/2/1990	Devisen Korrent CHF (Foreign currency)	20,000.00		690,863.00	Unknown
11/19/1990	11/20/1990	Ueberweisg Banque Francaise (Transfer order)		540,000.00	1,230,863.00	Banque Francaise Du Commerce
11/19/1990	11/19/1990	Ueberweisg SBV Zuerich (Transfer order)	540,000.00		690,863.00	Account #18679.4 [3]
11/22/1990	11/22/1990	Ueberweisg Erfel Anstalt (Transfer order)	100,000.00		590,863.00	Erfel Anstalt
11/26/1990	11/27/1990	Ueberweisg Banque Francaise (Transfer order)		60,000.00	650,863.00	Banque Francaise Du Commerce
11/26/1990	11/27/1990	Ueberweisg Banque Francaise (Transfer order)		393,000.00	1,043,863.00	Banque Francaise Du Commerce

OLIPHANT COMMISSION

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235,972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
12/4/1990	12/5/1990	Ueberweisg (Transfer order)		393,000.00	1,436,863.00	Banque Francaise Du Commerce
12/6/1990	12/6/1990	Ueberweisg Schweiz. Bankverein (Transfer order)	393,000.00		1,043,863.00	Account #18679.4 [3]
12/7/1990	12/10/1990	Ueberweisg Banque Francaise (Transfer order)		540,000.00	1,583,863.00	Banque Francaise Du Commerce
12/13/1990	12/13/1990	Ueberweisg Eifel Anstalt (Transfer order)	176,640.00		1,407,223.00	Eifel Anstalt
12/31/1990	12/31/1990	Umsatzkonto	704.50		1,406,518.50	Unknown
12/31/1990	12/31/1990	Porti / SPS (Postage)	19.50		1,406,499.00	Bank Charges
1/3/1991	12/31/1990	Konto at Call US\$ (account)		12,034.10	1,418,533.10	Investment income
<b>Total 1990</b>			<b>2,723,456.93</b>	<b>4,141,990.03</b>	<b>1,418,533.10</b>	
1/3/1991	1/3/1991	Ueberweisg SBV Zuerich (Transfer order)	200,000.00		1,218,533.10	Account #18679.4 [3]
1/3/1991	1/3/1991	Ueberweisg SBV Zuerich (Transfer order)	393,000.00		825,533.10	Account #18679.4 [3]
1/3/1991	1/3/1991	Ueberweisg SBV Zuerich (Transfer order)	540,000.00		285,533.10	Account #18679.4 [3]
1/8/1991	12/31/1990	Devisen Korrent DM (Foreign currency)	73.39		285,459.71	Unknown
1/9/1991	12/31/1990	Devisen Korrent SFR (Foreign currency)	1,283.20		284,176.51	Unknown
1/15/1991	1/15/1991	Ueberweisg Banq. Franc. Du Comm. (Transfer order)		80,000.00	364,176.51	Banque Francaise Du Commerce

**OLIPHANT COMMISSION**

Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
 I.A.L. International Aircraft Leasing Limited Account #235.972.037  
 For the Period October 3, 1988 to June 30, 1991 [1]

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
1/16/1991	1/16/1991	Ueberweisg Banq. Franc. Du Comm. (Transfer order)		48,000.00	412,176.51	Banque Francaise Du Commerce
2/1/1991	2/1/1991	Ueberweisg Erfel Anstalt (Transfer order)	100,000.00		312,176.51	Erfel Anstalt
2/1/1991	2/5/1991	Devisen Korrent CHF (Foreign currency)	25,000.00		287,176.51	Unknown
2/15/1991	2/15/1991	Ueberweisg Banq. Francaise, Paris (Transfer order)		401,000.00	688,176.51	Banque Francaise Du Commerce
3/11/1991	3/8/1991	Ueberweisg Bque. Franc. Du Comm. (Transfer order)		401,993.02	1,090,169.53	Banque Francaise Du Commerce
3/12/1991	3/12/1991	Ueberweisg Erfel Anstalt, Vaduz (Transfer order)	100,000.00		990,169.53	Erfel Anstalt
3/12/1991	3/12/1991	Ueberweisg SBV Zuerich (Transfer order)	540,000.00		450,169.53	Account #18679.4 [3]
4/2/1991	3/31/1991	Zinsen Korito at Call US\$ (interest account)		6,658.70	456,828.23	Investment income
4/3/1991	4/3/1991	Ueberweisg SBV Zuerich (Transfer order)	401,000.00		55,828.23	Account #18679.4 [3]
5/29/1991	5/29/1991	Ueberweisg Erfel Anstalt, Vaduz (Transfer order)	50,000.00		5,828.23	Erfel Anstalt
5/31/1991	6/3/1991	Ueberweisg Bque. Franc. Du Comm. (Transfer order)		80,000.00	85,828.23	Banque Francaise Du Commerce
5/31/1991	5/31/1991	Devisen Korrent CHF (Foreign currency)	4,000.00		81,828.23	Unknown

**OLIPHANT COMMISSION**

**Schedule of Activity in Verwaltungs Und Privat Bank, Vaduz, Liechtenstein  
I.A.L. International Aircraft Leasing Limited Account #235.972.037  
For the Period October 3, 1988 to June 30, 1991 [1]**

Date	Value Date	Description (Translation to English)	Debit (US \$)	Credit (US \$)	Balance (US \$)	Source/Use of Funds
6/17/1991	6/17/1991	Ueberweisg SBV Zuerich (Transfer order)	80,000.00		1,828.23	Account #18679.4 [3]
6/28/1991	6/28/1991	Ueberweisg Banque Francaise (Transfer order)		168,000.00	169,828.23	Banque Francaise Du Commerce
6/30/1991	6/30/1991	Umsatzkornm	911.20		168,917.03	Unknown
6/30/1991	6/30/1991	Sollzins (Debit interest)	3.10		168,913.93	Bank Charges
6/30/1991	6/30/1991	Porti / SPS (Postage)	15.93		168,898.00	Bank Charges
Total January 1991 - June 1991			2,435,286.82	1,185,651.72	168,898.00	
Total October 1988 to June 30, 1991			10,685,957.06	10,910,773.69	168,898.00	

**Notes:**

- [1] Prepared with reference to bank documents related to IAL account #235.972.037. The Commission obtained bank documents related to this account from Mr. Georgio Pelossi and Ms. Stevie Cameron via the DOJ. We have excluded activity within the account which appears to be investment activity.
- [2] Bank statements are not available prior to June 30, 1989. We cannot determine the completeness of documents available prior to this.
- [3] The amounts and timing of these withdrawals from IAL account #235.972.037 are consistent with deposits made to account #18679.4. For the purposes of this schedule we have assumed that the transfers from IAL account #235.972.037 were made to account #18679.4. Further details related to these transactions are available in Schedule 9.
- [4] On April 11, 1990 US\$390,859.93 was deposited to IAL account #235.972.037, of which US\$390,000.00 appears to be investment activity and US\$859.93 appears to be income related to the investment activity.
- [5] Hand writing on the associated bank document suggests this payment may have gone to an 18679 account "Steiger".



**OLIPHANT COMMISSION**

**Schedule of Known Account Activity in Swiss Bank Corporation, Zurich**

"IAL" 18679 Account #18679.1

For the Period October 14, 1986 to October 27, 1994 [1]

Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Source/Use
10/14/1986	Gutschriftsanzeige (Credit Advice)		641,283.00	Messerschmitt Boelkow Blohm GMBH
10/24/1986	Belastungsanzeige (Debit advise)	341,771.90		Schreiber Account #140226.0
10/27/1986	Belastungsanzeige (Debit advise)	260,641.00		Account #34107.0
<b>Total 1986</b>		<b>602,412.90</b>	<b>641,283.00</b>	
7/21/1987	Gutschriftsanzeige (Credit Advice)		130,478.00	Messerschmitt Boelkow Blohm GMBH
7/21/1987	Gutschriftsanzeige (Credit Advice)		160,476.00	Messerschmitt Boelkow Blohm GMBH
7/27/1987	Belastungsanzeige (Debit advise)	87,723.39		FMT Financial Management Trust SA
10/4/1987	Auszahlung Zulasten Von (Disbursement debit)	26,315.79		Cash withdrawal
11/5/1987	Belastungsanzeige (Debit advise)	149,000.00		Account #34107.0
<b>Total 1987</b>		<b>263,039.18</b>	<b>290,954.00</b>	
10/20/1988	Devisengeschaeft (Currency Transaction)		1,000,000.00	Unknown
10/24/1988	Uebertrag (Transfer)	1,000,000.00		Unknown
11/1/1988	Gutschriftsanzeige (Credit advise)		100,000.00	Kensington Account #235.971.030
10/31/1988	Gutschriftsanzeige (Credit advise)		1,000,000.00	Kensington Account #235.971.030
10/31/1988	Uebertrag (Transfer)	500,000.00		Account #41391.0 "FRANKFURT" [2]
10/31/1988	Belastungsanzeige (Debit advise)	100,000.00		BITUCAN Holdings Ltd. Account #1012-765
12/5/1988	Auszahlung Zulasten Von (Disbursement debit)	503,000.00		Cash withdrawal
<b>Total 1988</b>		<b>2,103,000.00</b>	<b>2,100,000.00</b>	
3/31/1989	Auszahlung Zulasten Von (Disbursement debit)	91,455.00		Cash withdrawal
5/25/1989	Gutschriftsanzeige (Credit advise)		40,000.00	Account #41391.0 "FRANKFURT"
10/25/1989	Belastungsanzeige (Debit advise)	120,015.44		Merkur Account #239 293 030

## OLIPHANT COMMISSION

### Schedule of Known Account Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #18679.1

For the Period October 14, 1986 to October 27, 1994 [1]

Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Source/Use
12/20/1989	Belastungsanzeige (Debit advice)	130,006.00		Merkur Account #239 293 030
<b>Total 1989</b>		<b>341,476.44</b>	<b>40,000.00</b>	
1/4/1990	Gutschriftsanzeige (Credit Advice)		17,294.85	Account #18679.4
6/12/1990	Auszahlung Zulasten Von (Disbursement debit)	60,300.00		Cash withdrawal
<b>Total 1990</b>		<b>60,300.00</b>	<b>17,294.85</b>	
3/15/1991	Auszahlung Zulasten Von (Disbursement debit)	84,745.76		Cash withdrawal
4/4/1991	Auszahlung Zulasten Von (Disbursement debit)	69,664.76		Cash withdrawal
7/5/1991	Auszahlung Zulasten Von (Disbursement debit)	195,227.77		Cash withdrawal
9/24/1991	Auszahlung Zulasten Von (Disbursement debit)	20,100.00		Cash withdrawal
12/10/1991	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
12/10/1991	Auszahlung Zulasten Von (Disbursement debit)	218,975.61		Cash withdrawal
12/12/1991	Gutschriftsanzeige (Credit Advice)		1,446,650.00	Account #47252.3
12/12/1991	Belastungsanzeige (Debit Advice)	30,003.31		BITUCAN Holdings Ltd. Account #340 10
12/12/1991	Belastungsanzeige (Debit Advice)	41,580.04		Kensington Account #235 971 013
<b>Total 1991</b>		<b>760,797.25</b>	<b>1,446,650.00</b>	
4/29/1992	Belastungsanzeige (Debit Advice)	140,021.44		BITUCAN Holdings Ltd. Account #340-10
5/7/1992	Belastungsanzeige (Debit Advice)	179,700.39		Sidmer, S.A. Account #0605 94 48 001
7/29/1992	Belastungsanzeige (Debit Advice)	23,799.01		Karlheinz Schreiber Account #2106 5962 10
10/15/1992	Auszahlung Zulasten Von (Disbursement debit)	48,685.49		Cash withdrawal
11/19/1992	Belastungsanzeige (Debit Advice)	700,009.78		Rockcliffe Enterprises Account #0124 329
12/17/1992	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal

**OLIPHANT COMMISSION**

**Schedule of Known Account Activity in Swiss Bank Corporation, Zurich**

**"IAL" 18679 Account #18679.1**

**For the Period October 14, 1986 to October 27, 1994 [1]**

Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Source/Use
<b>Total 1992</b>		<b>1,192,716.11</b>	<b>-</b>	
2/12/1993	Belastungsanzeige (Debit Advice)	22,691.55		M. Karlheinz Schreiber Account #2106 5962 10
3/2/1993	Belastungsanzeige (Debit Advice)	60,009.05		BITUCAN Holdings Ltd. Account #340-10
3/10/1993	Belastungsanzeige (Debit Advice)	100,008.98		BITUCAN Holdings Ltd. Account #340-10
3/18/1993	Belastungsanzeige (Debit Advice)	50,022.30		Rockcliffe Enterprises Account #1691385
4/23/1993	Belastungsanzeige (Debit Advice)	50,009.59		Rockcliffe Enterprises Account #1691385
5/10/1993	Belastungsanzeige (Debit Advice)	100,009.80		BITUCAN Holdings Ltd. Account #340-10
5/11/1993	Auszahlung Zulasten Von (Disbursement debit)	105,587.33		Cash withdrawal
5/11/1993	Auszahlung Zulasten Von (Disbursement debit)	50,250.00		Cash withdrawal
6/22/1993	Belastungsanzeige (Debit Advice)	50,023.04		Rockcliffe Enterprises Account #1691385
7/21/1993	Belastungsanzeige (Debit Advice)	100,023.17		BITUCAN Holdings Ltd. Account #340-10
7/22/1993	Belastungsanzeige (Debit Advice)	50,023.08		Rockcliffe Enterprises Account #1691385
7/23/1993	Belastungsanzeige (Debit Advice)	66,210.03		Karlheinz Schreiber Account #2106 5962 10
7/29/1993	Belastungsanzeige (Debit Advice)	155,009.44		Robert Hladun Trust Account #0841 0585830
8/17/1993	Belastungsanzeige (Debit Advice)	17,761.99		IAL Account #235 972 010
8/17/1993	Belastungsanzeige (Debit Advice)	50,023.86		Rockcliffe Enterprises Account #1691385
9/22/1993	Belastungsanzeige (Debit Advice)	50,025.69		BITUCAN Holdings Ltd. Account #340-10
9/22/1993	Belastungsanzeige (Debit Advice)	25,025.64		Rockcliffe Enterprises Account #1691385
9/23/1993	Belastungsanzeige (Debit Advice)	23,855.53		Karlheinz Schreiber Account #2106 5962 10
11/3/1993	Auszahlung Zulasten Von (Disbursement debit)	50,150.00		Cash withdrawal
<b>Total 1993</b>		<b>1,176,720.07</b>	<b>-</b>	



**OLIPHANT COMMISSION**

**Schedule of Known Account Activity in Swiss Bank Corporation, Zurich**

"IAL" 18679 Account #18679.1

For the Period October 14, 1986 to October 27, 1994 [1]

Value Date	Description (Translation to English)	Debit (CDN \$)	Credit (CDN \$)	Source/Use
1/21/1994	Belastungsanzeige (Debit Advice)	36,159.06		Kensington Account #235 971 013
1/21/1994	Belastungsanzeige (Debit Advice)	15,019.13		Rockcliffe Enterprises Account #1691385
3/16/1994	Auszahlung Zulasten Von (Disbursement debit)	210,227.27		Cash withdrawal
7/28/1994	Belastungsanzeige (Debit Advice)	307,062.44		Kensington Account #235 971 013
7/28/1994	Belastungsanzeige (Debit Advice)	52,465.90		Kensington Account #235 971 013
8/19/1994	Belastungsanzeige (Debit Advice)	32,275.42		IAL Account #235 972 010
9/13/1994	Belastungsanzeige (Debit Advice)	316,716.81		Kensington Account #235 971 013
10/27/1994	Auszahlung Zulasten Von (Disbursement debit)	54,764.51		Cash withdrawal
<b>Total 1994</b>		<b>1,024,690.54</b>	<b>-</b>	
<b>Total 1986 to 1994</b>		<b>7,525,152.49</b>	<b>4,536,181.85</b>	

**Notes:**

- [1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Bank statements for this account are not available for our review. Without bank statements we are unable to determine the completeness of the bank documents provided. We have excluded activity within the account which appears to be investment activity.
- [2] A bank document for the FRANKFURT account indicates that a \$40,000 payment was made to account #18679.1 on June 16, 1989. The bank document available for account #18679.1 indicates CDN\$40,000 was received into the account on June 16, 1989 and specifies an account #40391.0 as the source of the funds. Based on the timing and amount of the transaction in relation to the FRANKFURT account it appears these funds were paid from the FRANKFURT account (#41391.0) to account #18679.1.



## OLIPHANT COMMISSION

### Schedule of Known Account Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #18679.0

For the Period February 22, 1988 to November 5, 1993 [1]

Value Date	Description (Translation to English)	Debit (SFr.)	Credit (SFr.)	Source/Use
2/22/1988	Auszahlung Zulasten Von (Disbursement debit)	30,000.00		Cash disbursement
2/22/1988	Gutschriftsanzeige (Credit advice)		30,000.00	Account #18679.2
8/8/1988	Auszahlung Zulasten Von (Disbursement debit)	20,000.00		Cash disbursement
10/20/1988	Gutschriftsanzeige (Credit advice)		1,400,000.00	Kensington Account #235 971 013
10/25/1988	Auszahlung Zulasten Von (Disbursement debit)	50,000.00		Cash disbursement
10/26/1988	Auszahlung Zulasten Von (Disbursement debit)	40,000.00		Cash disbursement
<b>Total 1988</b>		<b>140,000.00</b>	<b>1,430,000.00</b>	
12/31/1989	Belastungsanzeige (Debit advice)	11,659.25		Account #18679.4
<b>Total 1989</b>		<b>11,659.25</b>		
2/28/1992	Auszahlung Zulasten Von (Disbursement debit)	30,000.00		Cash disbursement
3/10/1992	Auszahlung Zulasten Von (Disbursement debit)	200,000.00		Cash disbursement
3/30/1992	Devisen Abrechnung (Currency Statement)		198,000.00	Account #18679.4
8/6/1992	Belastungsanzeige (Debit Advice)	150,000.00		Herr Karlheinz Schreiber Account #619 110 00
<b>Total 1992</b>		<b>380,000.00</b>	<b>198,000.00</b>	
2/18/1993	Auszahlung Zulasten Von (Disbursement debit)	100,000.00		Cash disbursement
8/12/1993	Auszahlung Zulasten Von (Disbursement debit)	50,000.00		Cash disbursement
11/5/1993	Devisen Abrechnung (Currency Statement)		51,000.00	Account #18679.2
<b>Total 1993</b>		<b>150,000.00</b>	<b>51,000.00</b>	
<b>Total 1988 to 1993</b>		<b>681,659.25</b>	<b>1,679,000.00</b>	

**Note:**

[1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report.



**OLIPHANT COMMISSION**

**Schedule of Known Account Activity in Swiss Bank Corporation, Zurich**

**"IAL" 18679 Account #18679.2**

**For the Period January 15, 1987 to October 4, 1994 [1]**

Value Date	Description (English Translation)	Debit (DM)	Credit (DM)	Source/Use
1/15/1987	Auftrags (Commission, Order)	250,447.25		Kensington Anstalt
1/31/1987	Check-Abrechnung (Check account)		504,501.55	Unknown
6/24/1987	Auftrags (Commission, Order)	50,006.05		Account #053.459.5
11/3/1987	Auszahlung Zulasten Von (Disbursement debit)	30,150.00		Cash withdrawal
<b>Total 1987</b>		<b>330,603.30</b>	<b>504,501.55</b>	
2/22/1988	Belastungsanzeige (Debit advise)	36,674.80		Account #18679.0
<b>Total 1988</b>		<b>36,674.80</b>	<b>0.00</b>	
7/7/1989	Auszahlung Zulasten Von (Disbursement debit)	601,500.00		Cash withdrawal
<b>Total 1989</b>		<b>601,500.00</b>	<b>0.00</b>	
9/3/1991	Gutschriftsanzeige (Credit Advice)		112,847.00	Account #47252
9/24/1991	Belastungsanzeige (Debit Advice)	58,980.45		Sidmer S.A. Account #0605 94 48 00
10/24/1991	Auszahlung Zulasten Von (Disbursement debit)	50,250.00		Cash withdrawal
10/24/1991	Auszahlung Zulasten Von (Disbursement debit)	343,839.55		Cash withdrawal
10/28/1991	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
11/4/1991	Gutschriftsanzeige (Credit Advice)		5,030,000.00	Account #47252
11/6/1991	Auszahlung Zulasten Von (Disbursement debit)	501,500.00		Cash withdrawal
11/8/1991	Belastungsanzeige (Debit Advice)	58,000.00		IAL Account #235 972 010
<b>Total 1991</b>		<b>1,113,070.00</b>	<b>5,142,847.00</b>	
3/25/1992	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
6/29/1992	Belastungsanzeige (Debit Advice)	8,500,033.50		Herbert H.M. Leiduck Account #130 185.0
8/20/1992	Auszahlung Zulasten Von (Disbursement debit)	200,600.00		Cash withdrawal
11/18/1992	Auszahlung Zulasten Von (Disbursement debit)	300,900.00		Cash withdrawal
11/23/1992	Belastungsanzeige (Debit Advice)	33,860.05		Kensington Account #235 971 013
12/11/1992	Gutschriftsanzeige (Credit Advice)		1,575,000.00	Account #47252

## OLIPHANT COMMISSION

### Schedule of Known Account Activity in Swiss Bank Corporation, Zurich

"IAL" 18679 Account #18679.2

For the Period January 15, 1987 to October 4, 1994 [1]

Value Date	Description (English Translation)	Debit (DM)	Credit (DM)	Source/Use
12/17/1992	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
12/22/1992	Belastungsanzeige (Debit Advice)	37,037.05		Morgar Account #6010127160000059
<b>Total 1992</b>		<b>9,273,430.60</b>	<b>1,575,000.00</b>	
2/3/1993	Auszahlung Zulasten Von (Disbursement debit)	100,250.00		Cash withdrawal
3/2/1993	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
5/11/1993	Auszahlung Zulasten Von (Disbursement debit)	150,750.00		Cash withdrawal
5/11/1993	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
7/27/1993	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
8/12/1993	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
11/3/1993	Auszahlung Zulasten Von (Disbursement debit)	22,818.05		Cash withdrawal
11/3/1993	Auszahlung Zulasten Von (Disbursement debit)	201,000.00		Cash withdrawal
11/5/1993	Devisen-Abrechnung (Foreign currency account)	57,855.95		Account #18679.0
12/9/1993	Gutschriftsanzeige (Credit Advice)		707,000.00	Account #47252
12/28/1993	Auszahlung Zulasten Von (Disbursement debit)	60,300.00		Cash withdrawal
<b>Total 1993</b>		<b>994,974.00</b>	<b>707,000.00</b>	
6/22/1994	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
10/4/1994	Auszahlung Zulasten Von (Disbursement debit)	100,500.00		Cash withdrawal
<b>Total 1994</b>		<b>201,000.00</b>	<b>0.00</b>	
<b>Total 1987 to 1994</b>		<b>12,551,252.70</b>	<b>7,929,348.55</b>	

**Note:**

[1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Bank statements for this account are not available for our review. Without bank statements we are unable to determine the completeness of the bank documents provided.



OLIPHANT COMMISSION

Summary Schedule of Known Cash Withdrawals from Swiss Bank Corporation, Zurich

"IAL" 18679 Accounts #18679.0, #18679.1, #18679.2, #18679.4, #41391.0 "FRANKFURT", #46341.5 RUBRIK "BRITAN"

For the Period October 4, 1987 to November 21, 1994 [1]

Value Date	Withdrawn from Account	Cash Withdrawal (CDN \$)	Cash Withdrawal (SFr.)	Cash Withdrawal (DEM)	Cash Withdrawal (FF)
10/4/1987	"IAL" 18679 Account #18679.1		30,000.00		
11/3/1987	"IAL" 18679 Account #18679.2			30,000.00	
		-	30,000.00	30,000.00	-
2/22/1988	"IAL" 18679 Account #18679.0		30,000.00		
8/8/1988	"IAL" 18679 Account #18679.0		20,000.00		
10/25/1988	"IAL" 18679 Account #18679.0		50,000.00		
10/26/1988	"IAL" 18679 Account #41391.0 "FRANKFURT"	100,000.00			
10/26/1988	"IAL" 18679 Account #18679.0		40,000.00		
12/5/1988	"IAL" 18679 Account #18679.1		610,642.00		
1/24/1989	"IAL" 18679 Account #41391.0 "FRANKFURT"	40,000.00			
3/31/1989	"IAL" 18679 Account #18679.1	91,000.00			
6/29/1989	"IAL" 18679 Account #41391.0 "FRANKFURT"	30,000.00			
7/7/1989	"IAL" 18679 Account #18679.2			600,000.00	
9/12/1989	"IAL" 18679 Account #41391.0 "FRANKFURT"	30,000.00			
		291,000.00	750,642.00	600,000.00	-
4/11/1990	"IAL" 18679 Account #18679.4		156,450.00		
4/11/1990	"IAL" 18679 Account #18679.4		60,000.00		
6/12/1990	"IAL" 18679 Account #41391.0 "FRANKFURT"	60,000.00			
6/12/1990	"IAL" 18679 Account #18679.1	60,000.00			
10/3/1990	"IAL" 18679 Account #18679.4		84,500.00		
11/19/1990	"IAL" 18679 Account #18679.4		255,150.00		
		120,000.00	556,100.00	-	-
1/23/1991	"IAL" 18679 Account #18679.4	50,000.00			
1/23/1991	"IAL" 18679 Account #18679.4			100,000.00	
3/15/1991	"IAL" 18679 Account #18679.1		100,000.00		
4/4/1991	"IAL" 18679 Account #41391.0 "FRANKFURT"	100,000.00			
4/4/1991	"IAL" 18679 Account #18679.1		85,200.00		
7/5/1991	"IAL" 18679 Account #18679.1		770,000.00		
7/24/1991	"IAL" 18679 Account #18679.4			100,000.00	
9/24/1991	"IAL" 18679 Account #41391.0 "FRANKFURT"		45,143.07		
9/24/1991	"IAL" 18679 Account #41391.0 "FRANKFURT"	20,000.00			
9/24/1991	"IAL" 18679 Account #18679.1	20,000.00			
10/24/1991	"IAL" 18679 Account #18679.2			50,000.00	
10/24/1991	"IAL" 18679 Account #18679.2		300,000.00		
10/28/1991	"IAL" 18679 Account #18679.2			100,000.00	
11/6/1991	"IAL" 18679 Account #18679.2			500,000.00	
12/10/1991	"IAL" 18679 Account #18679.1	100,000.00			
12/10/1991	"IAL" 18679 Account #18679.1			300,000.00	
		290,000.00	1,300,343.07	1,150,000.00	-
2/28/1992	"IAL" 18679 Account #18679.0		30,000.00		
3/10/1992	"IAL" 18679 Account #18679.0		200,000.00		
3/25/1992	"IAL" 18679 Account #18679.2			100,000.00	
4/28/1992	"IAL" 18679 Account #18679.4			200,000.00	
4/28/1992	"IAL" 18679 Account #18679.4		20,000.00		
7/3/1992	"IAL" 18679 Account #18679.4				100,000.00
7/3/1992	"IAL" 18679 Account #18679.4			100,000.00	
8/20/1992	"IAL" 18679 Account #41391.0 "FRANKFURT"		53,500.00		
8/20/1992	"IAL" 18679 Account #18679.2			200,000.00	
10/15/1992	"IAL" 18679 Account #18679.1		50,000.00		
11/18/1992	"IAL" 18679 Account #41391.0 "FRANKFURT"	30,000.00			
11/18/1992	"IAL" 18679 Account #18679.2			300,000.00	
12/17/1992	"IAL" 18679 Account #18679.2			100,000.00	
12/17/1992	"IAL" 18679 Account #18679.1	100,000.00			
		130,000.00	353,500.00	1,000,000.00	100,000.00
2/3/1993	"IAL" 18679 Account #41391.0 "FRANKFURT"		76,075.00		
2/3/1993	"IAL" 18679 Account #41391.0 "FRANKFURT"	75,000.00			
2/3/1993	"IAL" 18679 Account #18679.2			100,000.00	



OLIPHANT COMMISSION

Summary Schedule of Known Cash Withdrawals from Swiss Bank Corporation, Zurich

"IAL" 18679 Accounts #18679.0, #18679.1, #18679.2, #18679.4, #41391.0 "FRANKFURT", #46341.5 RUBRIK "BRITAN"

For the Period October 4, 1987 to November 21, 1994 [1]

Value Date	Withdrawn from Account	Cash Withdrawal (CDN \$)	Cash Withdrawal (SFr. )	Cash Withdrawal (DEM)	Cash Withdrawal (FF)
2/18/1993	"IAL" 18679 Account #18679.0		100,000.00		
3/2/1993	"IAL" 18679 Account #18679.2			100,000.00	
5/11/1993	"IAL" 18679 Account #18679.2			150,000.00	
5/11/1993	"IAL" 18679 Account #18679.2			100,000.00	
5/11/1993	"IAL" 18679 Account #18679.1		120,000.00		
5/11/1993	"IAL" 18679 Account #18679.1	50,000.00			
7/27/1993	"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"	100,000.00			
7/27/1993	"IAL" 18679 Account #18679.2			100,000.00	
8/12/1993	"IAL" 18679 Account #18679.0		50,000.00		
8/12/1993	"IAL" 18679 Account #18679.2			100,000.00	
11/3/1993	"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"	100,000.00			
11/3/1993	"IAL" 18679 Account #41391.0 "FRANKFURT"	50,000.00			
11/3/1993	"IAL" 18679 Account #41391.0 "FRANKFURT"		76,000.00		
11/3/1993	"IAL" 18679 Account #18679.2		20,000.00		
11/3/1993	"IAL" 18679 Account #18679.2			200,000.00	
11/3/1993	"IAL" 18679 Account #18679.1	50,000.00			
12/28/1993	"IAL" 18679 Account #18679.2			60,000.00	
		425,000.00	442,075.00	910,000.00	-
3/16/1994	"IAL" 18679 Account #18679.1		220,000.00		
6/22/1994	"IAL" 18679 Account #18679.2			100,000.00	
7/21/1994	"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"	50,000.00			
10/4/1994	"IAL" 18679 Account #18679.2			100,000.00	
10/27/1994	"IAL" 18679 Account #18679.1		50,000.00		
11/21/1994	"IAL" 18679 Account #46341.5 RUBRIK "BRITAN"	50,000.00			
		100,000.00	270,000.00	200,000.00	-
Total		1,356,000.00	3,702,660.07	3,890,000.00	100,000.00

Note:

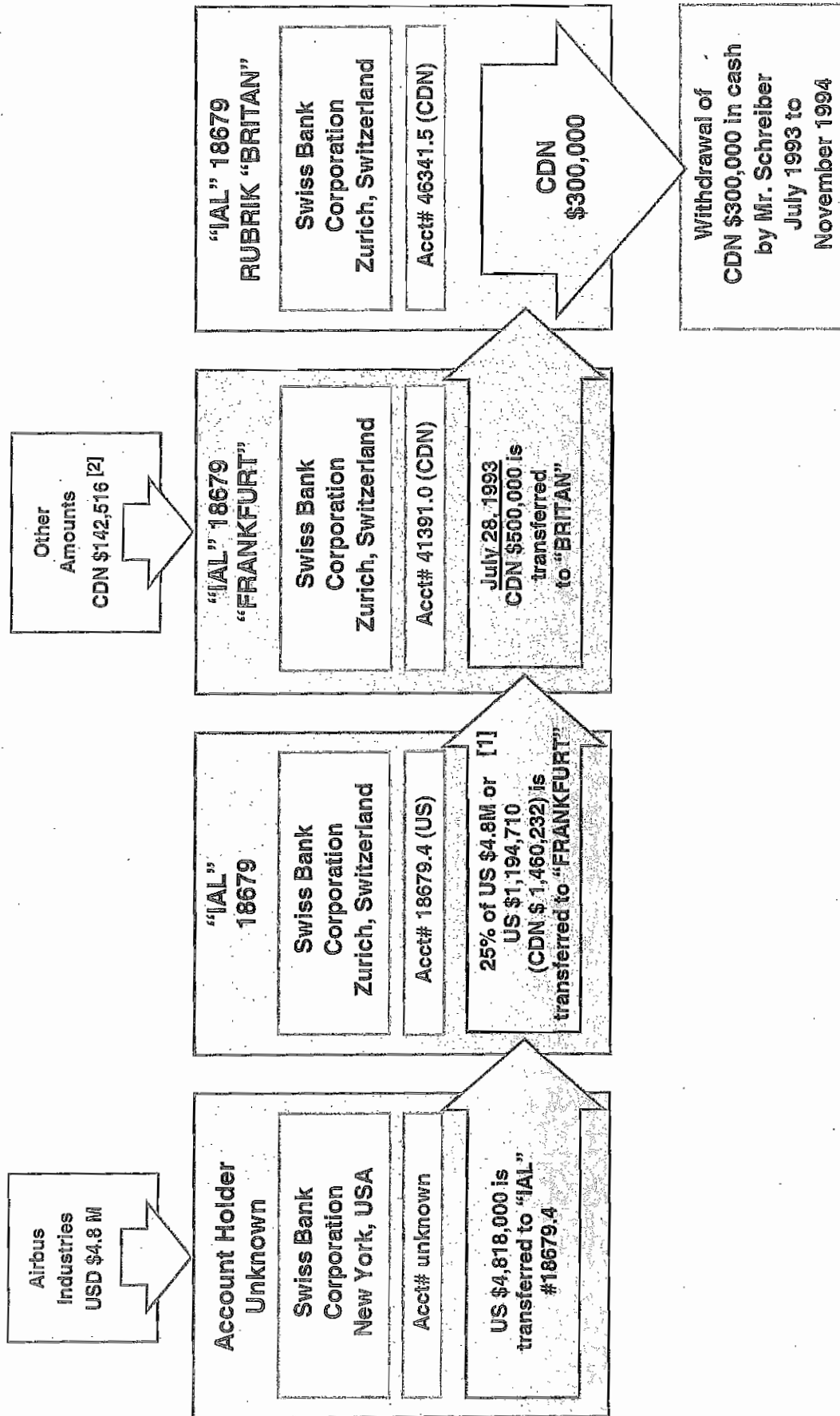
[1] This schedule was prepared with reference to bank account documents provided by Mr. Karlheinz Schreiber. Copies of the documents relied upon are contained in Appendix 3 to the Navigant Report. Not all bank statements for these account are not available for our review. Without bank statements we are unable to determine the completeness of the bank documents provided.





Chart: A

# Flow of Funds Related to CDN \$300,000 Cash Withdrawals from the "BRITAN" Account - For the Period March 13, 1992 to November 21, 1994

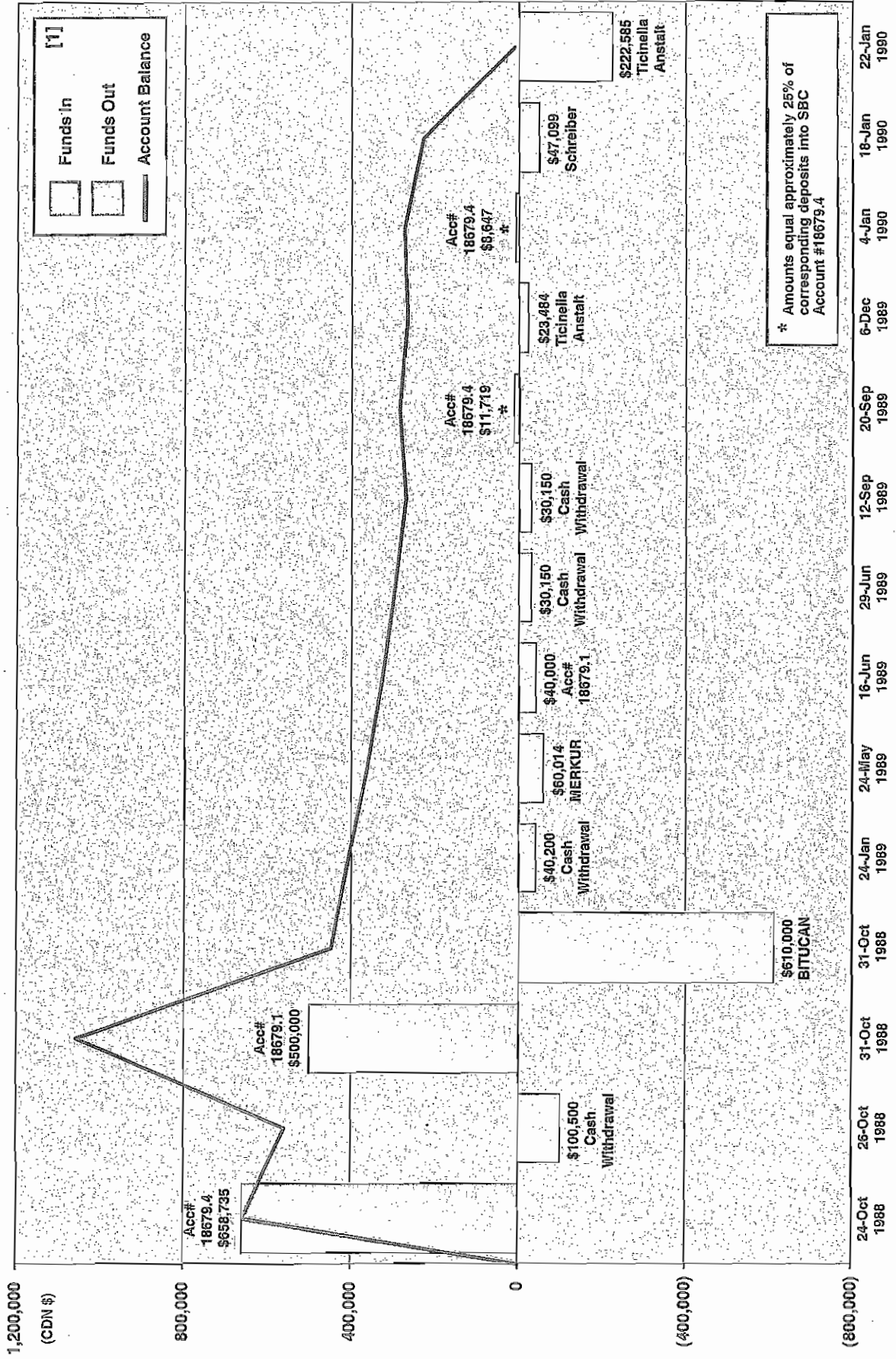


[1] Amount based on the pattern of deposits to Account #18679.4 and corresponding 25% deposits to the "FRANKFURT" account.

[2] Other amounts consist of a balance of CDN \$82,941 on March 13, 1992; investment income of CDN \$49,605; and, CDN \$10,000 of unknown origin.



**Chart: B Swiss Bank Corporation, Zurich, "IAL" 18679 Account # 41391.0 "FRANKFURT"  
Summary of Account Activity for the Period October 24, 1988 to January 22, 1990**

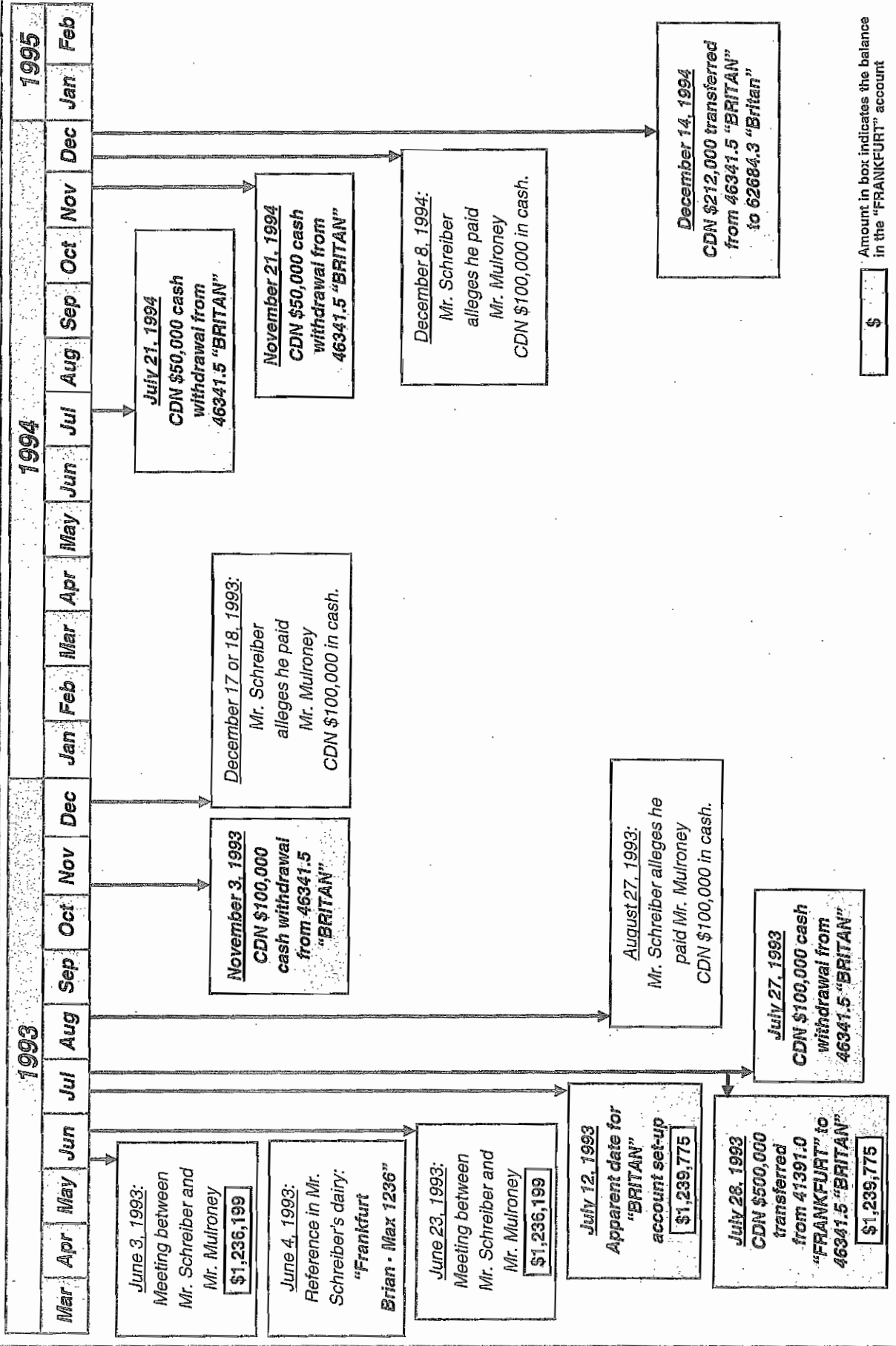


\* Amounts equal approximately 25% of corresponding deposits into SBC Account #18679.4

[1] Investment income and bank charges are excluded in the "Funds In" and "Funds Out" but are included in the "Account Balance"



**Chart: C Timeline of Certain Alleged Meetings Between Mr. Schreiber and Mr. Mulronee and the Sources and Uses of Funds to the "BRITAN" Acct. - For the Period June 3, 1993 to December 14, 1994**



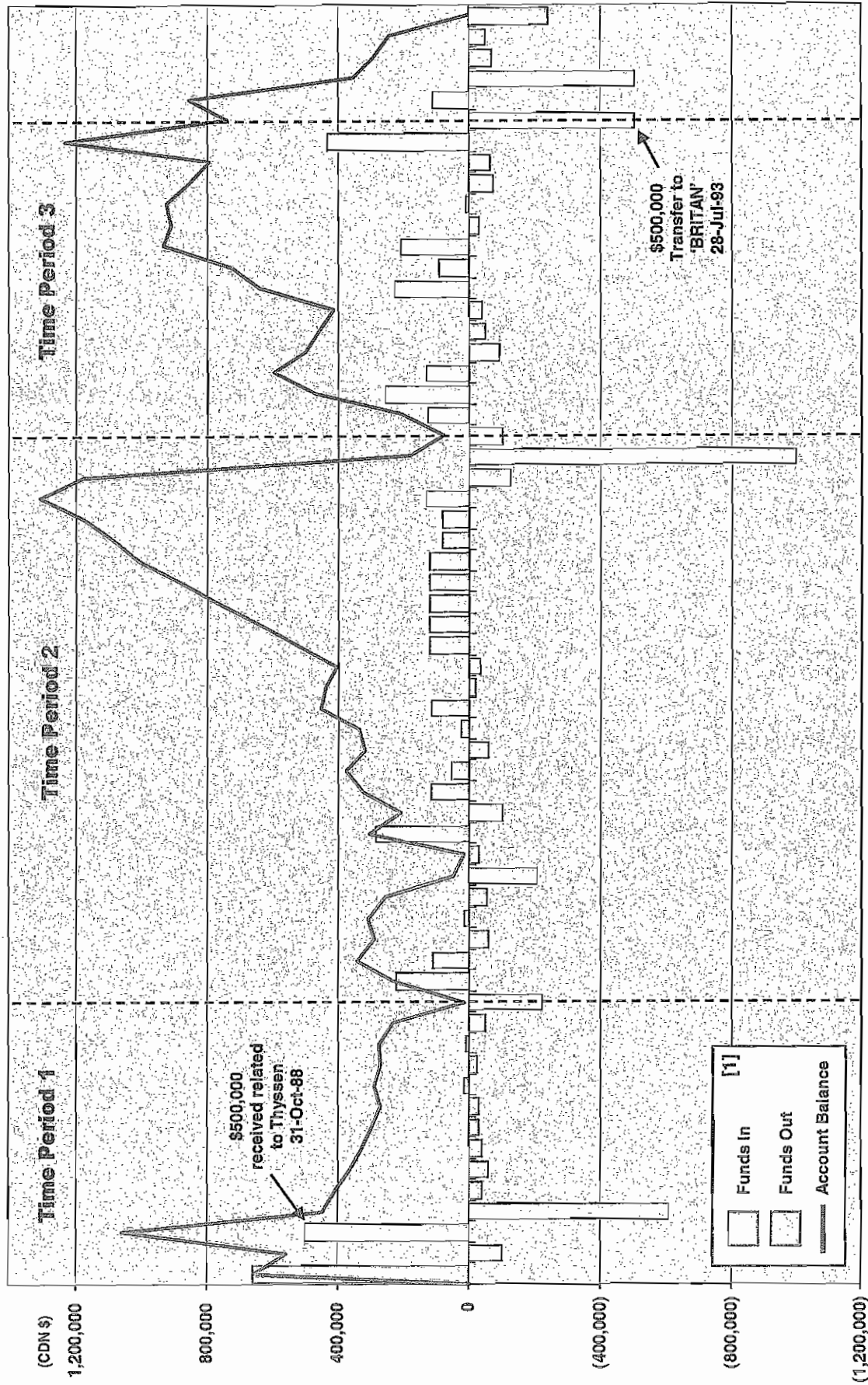
Amount in box indicates the balance in the "FRANKFURT" account

\$





**Chart: D Swiss Bank Corporation, Zurich, "IAL" 18679 Account # 41391.0 "FRANKFURT"  
 Summary of Account Activity for the Period October 24, 1988 to December 30, 1993**



[1] Investment income and bank charges are excluded in the "Funds In" and "Funds Out" but are included in the "Account Balance"



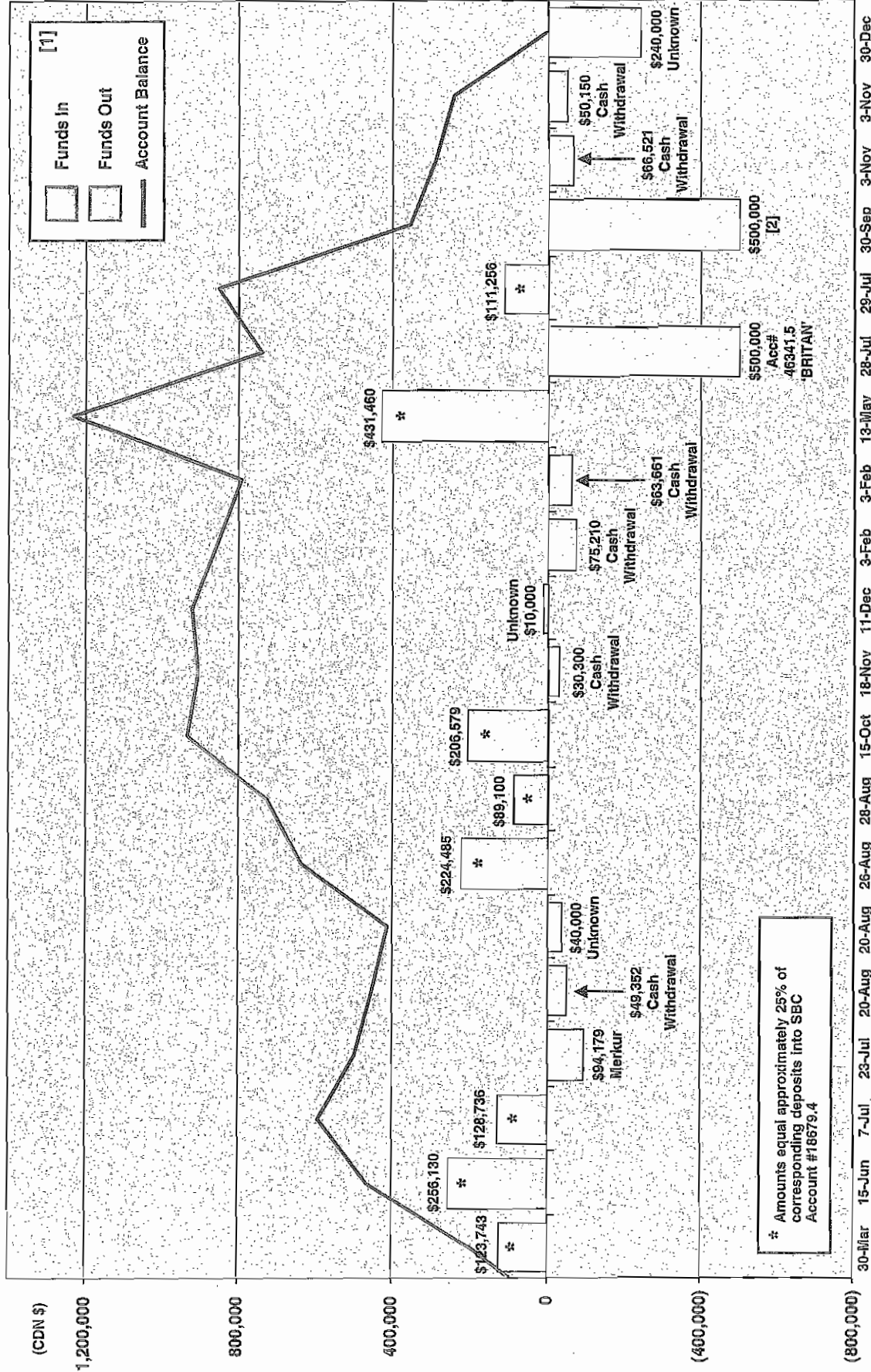
Chart: E

**Comparison of Deposits into Acct. # 41391.0 "FRANKFURT" to Deposits into Acct. # 18679.4 - For the Period March 26, 1992 to May 13, 1993**

Deposit Date	Deposit to Acct# 41391.0 "FRANKFURT" [Converted to US\$]	Deposit Date	Deposit from Swiss Bank Corporation, New York to Acct# 18679.4	Deposit to "FRANKFURT" as a Percentage of Deposit to 18679.4
30 Mar 92	US \$103,933	26 Mar 92	US \$426,000	24.4%
15 Jun 92	214,874	18 May 92	860,000	25.0%
7 Jul 92	107,603	15 Jun 92	432,000	24.9%
26 Aug 92	188,516	11 Aug 92	763,000	24.7%
28 Aug 92	74,455	24 Aug 92	300,000	24.8%
15 Oct 92	165,329	25 Sept 92	668,000	24.7%
13 May 93	340,000	6 May 93	1,369,000	24.8%
<b>TOTAL</b>	<b>US \$1,194,710</b>		<b>US \$4,818,000</b>	<b>24.8%</b>



Chart: F Swiss Bank Corporation, Zurich, "IAL" 18679 Account # 41391.0 "FRANKFURT"  
 Summary of Account Activity for the Period March 30, 1992 to December 30, 1993



\* Amounts equal approximately 25% of corresponding deposits into SBC Account #18679.4

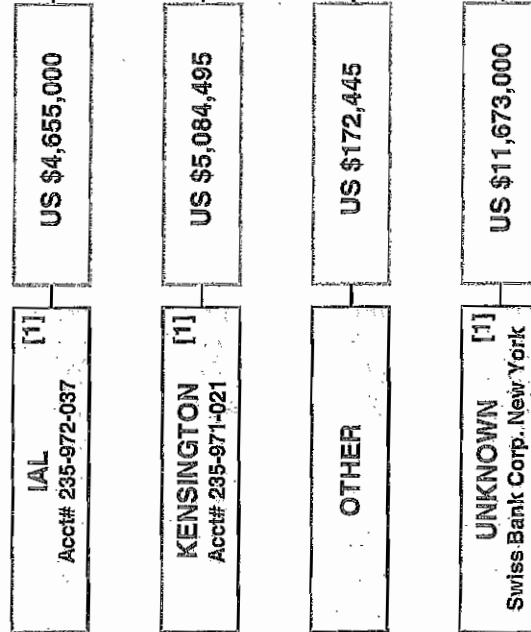
[1] Investment income and bank charges are excluded in the "Funds In" and "Funds Out" but are included in the "Account Balance"  
 [2] Identified in Mr. Schreiber's personal diary as a disbursement to "MARC"



Chart: G

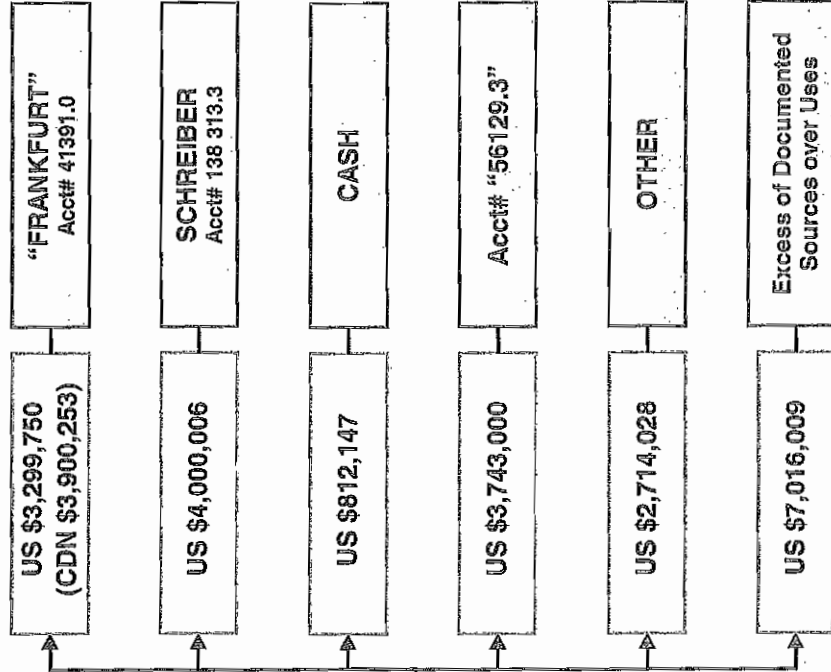
**Swiss Bank Corporation, Zurich, "IAL" 18679 Account # 18679.4**  
**Apparent Sources and Uses of Funds for the Period October 6, 1988 to November 22, 1993**

**Source of Funds**



US \$21,584,940

**Use of Funds**



US \$21,584,940

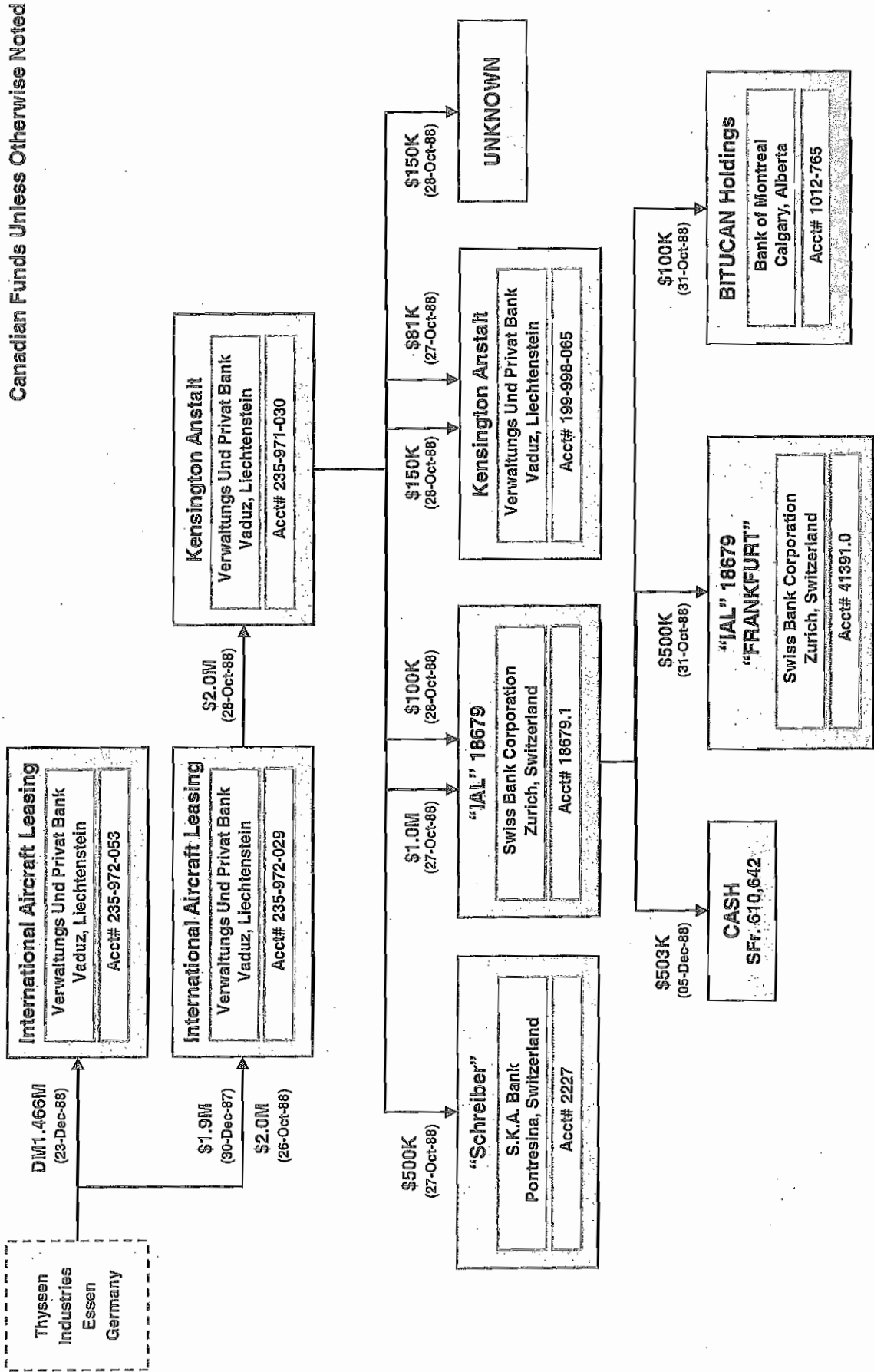
[1] These funds appear to relate to amounts IAL received from Airbus





Chart: H

# I.A.L. International Aircraft Leasing Limited Thyssen Industries Flow of Funds for the Period December 30, 1987 to December 23, 1988







## Steven Whitla CA•IFA, CBV, CFE

Steven Whitla  
Managing Director

150 Metcalfe Street  
22<sup>nd</sup> Floor  
Ottawa, ON, Canada, K2P 1P1  
Tel: 613 230 4546  
Fax: 613 230 4548

[swhitla@navigantconsulting.com](mailto:swhitla@navigantconsulting.com)

### Education and Professional Credentials

- 2001 Chartered Business Valuator (CBV)
- 2000 (inaugural year) Specialist designation in Investigative and Forensic Accounting (CA•IFA)
- 1989 Chartered Accountant (CA)
- Bachelor of Commerce (B.Comm) - Carleton University

### Professional Career

- 2005 – present  
Navigant Consulting
- 1992 – 2005  
Kroll Lindquist Avey (*and predecessor companies*)
- 1987 – 1992  
KPMG

### Professional Experience

Steven Whitla is a Managing Director in Navigant Consulting's Ottawa Office. He joined Navigant after its acquisition of Kroll Lindquist Avey in August 2005. Steven had previously joined Kroll Lindquist Avey in 1992 following two years as a forensic and investigative accountant with a major international accounting firm. Steven has conducted financial-systems reviews on behalf of corporations, and federal and local governments to determine their susceptibility to inappropriate activity and mismanagement. He has investigated several criminal cases involving employee, management and investor fraud, money laundering, kickbacks and homicide for profit.

Steven's government experience also includes reviews of contracts and funding agreements for federal departments and agencies in addition to acting as a "Fairness Monitor" for several significant procurements. His civil-litigation experience includes business valuations, quantification of damages as from contract disputes, loss-of-profits calculations, construction-lien-act and personal-injury cases.

Steven has also been involved in numerous due-diligence reviews on behalf of the investment-banking community. The areas of concern uncovered during these reviews have impacted on the pricing or resulting in the outright cancellation of some deals.

Representative assignments:

- ◆ Lost profit / economic damages
- ◆ Civil and criminal investigations
- ◆ Bonding / insurance claims
- ◆ Business valuations
- ◆ Government procurement
- ◆ Due diligence investigations
- ◆ Financial systems / internal controls
- ◆ Regulatory matters

**Noteworthy Cases**

- Provided financial litigation support to the Government of Canada (GOC) defending itself in a multi-million dollar damages claim brought by a major technology consulting firm alleging unfair treatment by the GOC during a procurement process. Settled for an amount 50% less than the figure calculated by the technology company's financial expert.
- One of two firm leads responsible for the forensic accounting team retained by the Gomery Inquiry. Role involved the investigation of alleged mismanagement as well as potential fraud relating to the Federal Government's advertising and sponsorship program. The firm's work product was used to form part of the Gomery report and required the provision of expert testimony
- Provided litigation support in a \$10-million breach-of-trust case brought by a major bank and a construction company against contractors bonded by our client.
- Quantified damages resulting from a fire and subsequent roof collapse at a textile manufacturing facility and assessed the credibility of damages sought.
- Acted as the fairness monitor overseeing Public Works and Government Services Canada's (PWGSC) alternative forms of delivering initiative to privatize \$270 million of property management services. Reviewed the Request for Qualification (RFQ), Request for Proposal (RFP) documents and the evaluation plans for proposals received in responses to sent documents. Responsible for review and oversight of evaluations undertaken, resolution or fairness and consistency issues raised during the evaluation process, attended bidder debriefings and reported on the results of work undertaken.
- Reviewed on behalf of PWGSC the openness and fairness of the Contract Dispute Advisory Board (CDAB) and its adherence to its own prescribed processes in a dispute between Defense Construction Canada and a construction contractor. Also assessed the validity of complaints made by the FCC.

- Retained by Industry Canada's Bureau of Competition Policy to provide accounting advice on two matters before the Competition Tribunal. Reviewed and analyzed financial studies provided by those parties under investigation by the Competition Bureau.
- Retained by PWGSC and Department of National Defense (DND) to review the contracting process used in the awarding of a multi-million dollar contract for the refurbishment of CT-133 Aircraft. Determined: (i) the extent to which contracting/selection practices complied with relevant PWGSC/DND-approved procurement policies and practices; (ii) whether the contracting process was fair during the development of the RFP, the bid evaluation and the selection of successful bidder.
- Quantified amounts still owing from a lease dispute going back 20+ years between the Crown and a landlord for a major Crown-occupied office complex.
- Reviewed and investigated compliance by a railway with the terms of a railcar usage agreement following suspicions that the railway had not been making required payments to the Crown.
- Retained by the Government of Canada to investigate allegations of wrongdoing in the awarding of a \$2-million contract for the development of a web portal.
- Retained by the Department of Justice to assemble and coordinate documents and review and investigate issues related to the controversial awarding of a long-term lease for the Pearson Airport.

### **Selected Presentations**

- "The Treasure Hunt – How to Identify Hidden Assets", Carleton County Law Association Annual Conference, 2002.
- "Fraud Awareness", Select group of Indonesian auditors, sponsored by the Government of Canada.

### **Professional Affiliations**

- Canadian Institute of Chartered Accountants (CICA)
- Canadian Institute of Chartered Business Valuators (CICBV)
- Institute of Chartered Accountants of Ontario (ICAO)
- Alliance for Excellence In Investigative and Forensic Accounting (IFA)
- National Association of Certified Fraud Examiners (NACFE)





## APPENDIX 2

### SCOPE OF REVIEW

Documents reviewed and relied upon:

**1. Copies of the documents provided to the Commission by Mr. Karlheinz Schreiber include the following:**

**A. Banking Documents:**

- "IAL" 18679 Account #46341.5 RUBRIK "BRITAN" - Bank statements and supporting documentation related to the period from July 1, 1993 to January 27, 1995;
- "IAL" 18679 Account #41391.0 "FRANKFURT" - Bank statements and various supporting documentation related to the period from October 24, 1988 to March 31, 1994;
- "IAL" 18679 Account #18679.0 - Various documents supporting deposits and withdrawals (excluding bank statements) related to the period from February 22, 1988 to November 5, 1993;
- "IAL" 18679 Account #18679.1 - A bank statement (for the period June 30, 1988 and December 23, 1988) and various documents supporting deposits and withdrawals related to the period from October 23, 1986 to October 27, 1994;
- "IAL" 18679 Account #18679.2 - Various documents supporting deposits and withdrawals (excluding bank statements) related to the period from January 15, 1987 to October 4, 1994;
- "IAL" 18679 Account #18679.4 - Various documents supporting deposits and withdrawals (excluding bank statements) related to the period from October 6, 1988 to November 22, 1994;
- "IAL" 18679 Account #46341.2 RUBRIK FRED - A bank statement related to the period from January 1, 1991 to June 30, 1991;
- "IAL" 18679 Account #18679.7 RUBRIK MAXWELL and RUBRIK MASTER - A bank statement related to the period from September 30, 1994 to December 31, 1994 and various documents supporting deposits and withdrawals;
- Account #56129.8 "FRANKFURT" - A bank statement related to the period from January 1, 1995 to June 30, 1995; and
- BITUCAN Holdings Ltd. Bank of Montreal account #1012-765 - Various cheques dated November 15, 1988 and corresponding invoices.

**B. Other Documents:**

- An affidavit of Mr. Karlheinz Schreiber dated November 7, 2007;
- Mr. Schreiber's personal diaries for the period January 1, 1990 to December 31, 1994;
- A summary of amounts "I.A.L." received in relation to MBB, Airbus and Thyssen between 1986 and June 30, 1991;
- Two unsigned Agreements between I.A.L. International Aircraft Leasing and Airbus Industrie, G.I.E. related to the sale of aircrafts in Canada;

## APPENDIX 2

### SCOPE OF REVIEW

- An unsigned Agreement between I.A.L. International Aircraft Leasing and Airbus Industrie, G.I.E. related to the sale of aircrafts in Thailand;
- A list of transactions related to account #45828.0 for the period October 4, 1990 to November 21, 1992;
- A letter dated December 27, 1995 from Mr. Karlheinz Schreiber to Mr. Frank A. Moores; and
- An invoice from BITUCAN Holdings Ltd. to Merkur Handels- und Industrie AG dated October 20, 1988.

### 2. Copies of the documents provided to the Commission by Mr. Georgio Pelossi include the following:

#### A. Banking Documents:

- I.A.L International Aircraft Leasing Limited account #235.972.029 - A daily bank statement and supporting documents related to the period from December 30, 1987 to October 26, 1988;
- I.A.L International Aircraft Leasing Limited account #235.972.053 - A daily bank statement and supporting document dated December 23, 1988; and
- Kensington Anstalt account #235.971.030 - A daily bank statement dated October 28, 1988 and supporting documents dated October 27 and October 28, 1988.

#### B. Other Documents:

- An I.A.L. International Aircraft Leasing Limited invoice to Thyssen Industrie AG dated October 4, 1988.

### 3. Copies of the documents provided to the Commission by the Department of Justice ("DOJ") include the following:

#### A. Documents Obtained Directly by the DOJ:

- An Understanding in Principle between the Government of Canada and Bear Head Industries Ltd. dated September 27, 1988; and
- Translated version of the Record of the Case for the Extradition of the defendant Schreiber from Canada for the Purposes of Criminal Prosecution from the Public Prosecutor's Office of Augsburg.

#### B. Documents Obtained by the DOJ via the RCMP:

- BITUCAN Holding Ltd. Bank of Nova Scotia account #340-10 - Bank statements for the period March 31, 1989 to December 31, 1993 (excluding the periods November 1 to 29, 1991 and January 1 to 31, 1992); and
- The statement of Mr. Georgio Pelossi to the RCMP dated August 7, 1998.

## **APPENDIX 2**

### **SCOPE OF REVIEW**

- C. Documents Obtained by the DOJ, obtained through Mr. Georgio Pelossi and Ms. Stevie Cameron via the RCMP, include the following:**
- I.A.L International Aircraft Leasing Limited account #235.972.029 - Various bank statements and supporting documents;
  - Kensington Anstalt account #235.971.013 - A daily bank statement and supporting documentation dated October 19, 1988; and
  - Merkur Handels und Industrie AG account #239.293.030 – a daily bank statement and supporting documentation dated April 4, 1989.
- 4. Copies of the documents obtained by the Commission through the CBC Website:**
- “IAL” 18679 account #18679.4 - A bank statement related to the period from October 6, 1988 to December 21, 1988; and
  - I.A.L. International Aircraft Leasing Limited account #235.972.029 - A bank statement and a credit advise dated October 28, 1988.
- 5. Interview of Mr. Schreiber Conducted by Commission Counsel on March 24, 2009 Adopted by Mr. Schreiber in his testimony to the Commission**



**APPENDIX 3**

**Documents Relied Upon (binders 1 and 2).**