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Commissioner



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le professionnalisme, la compassion, le respect et la responsabilisation

OCT 01 2020

Mr. Sharaf Sharafeldin
Executive Director
Muslim Association of Canada
2270 Speakman Drive
Mississauga, Ontario
L5K 1B4

Dear Mr. Sharafeldin:

Thank you for your correspondence of September 14, 2020, outlining your concerns related to Project Sapphire, as well as seeking to establish a long-term collaborative relationship with the Royal Canadian Mounted Police (RCMP).

Project Sapphire dealt with the listing of the International Relief Fund for the Afflicted – Canada (IRFAN) as a terrorist entity under the *Criminal Code*, during which the search warrant you reference was executed. Once a search warrant is executed, both the search warrant and supporting affidavits are considered public documents, which can be requested through an application to the court. It is our understanding that, in this case, at least one media organization in Montreal filed an application in court for a copy of an affidavit. I can confirm that no documents were shared by the RCMP with any media outlets.

While it is unfortunate that Refinitiv has relied solely on media coverage as the basis for its decisions, it is RCMP policy to neither confirm nor deny who may currently be under investigation, or have been under investigation in the past. This policy exists to protect the integrity of our investigative processes.

That being said, I can confirm certain facts. Notably, until IRFAN's charitable status was revoked in 2011, it was perfectly legal to make donations as they were a legitimate registered charity. Based on information from the Canada Revenue Agency, the Muslim Association of Canada was identified as a significant contributor to IRFAN. No charges were laid against your organization as a result of this investigation.

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With respect to enhancing the relationship between our two organizations, I would encourage you to reach out to Acting Assistant Commissioner Richard Emery, Federal Policing National Security, to discuss how the outreach program run by our Integrated National Security Enforcement Teams (INSET) could be leveraged to achieve this desired result, building on the community roundtables already hosted with INSET in Alberta. He may be reached via email at **Richard.Emery@rcmp-grc.gc.ca**.

I appreciate you bringing these concerns to my attention, and trust that your collaboration with the INSETs will lay the foundation for an even stronger and more collaborative relationship between the RCMP and the Canadian Muslim Community.

Kindest regards,



Brenda Lucki
Commissioner



Commissioner Brenda Lucki
RCMP National Headquarters
73 Leikin Drive
Ottawa ON K1A 0R2

September 14, 2020

Dear Commissioner Lucki,

Re: Project Sapphire and the Muslim Association of Canada

The Muslim Association of Canada (MAC) is the largest Muslim grassroots organization in Canada. Further to our recent meeting with Minister Blair, I am writing to express our frustration with a situation that causes us considerable concern.

MAC is dedicated to present a positive, contemporary interpretation of Islam. Through our actions and service we work to build communities and strengthen neighbourhoods across Canada, and through collaborations with groups from different religious, ethnic, and racial backgrounds.

We offer spiritual and educational services to tens of thousands of Canadians every year. We are one of the largest independent faith-based education institutions and providers of community services to Canada's Muslim population. In addition to our headquarters in Mississauga, MAC operates over 50 institutions including full-time and supplemental schools, childcare centres, youth and community centres and mosques across Canada serving around 55,000 community members weekly.

As part of this mission, we have always worked to build positive connections between our community and Canadian law enforcement agencies, including the RCMP. In 2019 we participated in RCMP recruitment in MAC mosques to assist the RCMP in achieving its diversity and equity goals. We have hosted a round table to connect RCMP officers with community leaders to discuss growing anti-Muslim hate. Most recently, MAC representatives were invited to participate in community roundtables hosted by the RCMP's Integrated National Security Enforcement Team in Alberta.

On January 29, 2015, leaked content relating to the RCMP's Project Sapphire was printed in a newspaper article published in various Sun Media Outlets (the "2015 Article"). Written by



Brian Daly and entitled “*Muslim group linked to terror organization buying buildings across Canada*,”¹ the article stated:

“The group was named in a search warrant related to Project Sapphire, a probe into terrorist financing. Warrants indicate MAC sent nearly \$300,000 in the 2000s to IRFAN-Canada, a group that raised millions for Hamas.”

MAC first learned of this search warrant in the 2015 Article. Since then, no search warrant has ever been served on MAC and MAC has never seen it or been able to confirm its contents. This raises the question of how a reporter was provided a copy of the search warrant, and the validity of the reporter’s claim. MAC has been denied access to the same document. To this day, despite direct requests for clarification from the RCMP, we still do not know if the article was correct that MAC was mentioned in the warrant, or in what context.

The 2015 Article also makes the unfounded leap that MAC’s CRA-compliant disbursement of funds to IRFAN, when IRFAN was a qualified donee, constituted MAC having a link to Hamas. MAC did distribute part of its designated donations for relief to IRFAN until 2009, all of which were duly reported to CRA. In 2011, two years after our last transfer of donations, CRA revoked IRFAN’s charitable status. It was only in 2014, five years after our last donation to IRFAN, that IRFAN was listed as a terrorist entity due to links with Hamas.

The consequences of the leaked warrant and the 2015 Article have been far-reaching. The article has been used by anti-Muslim commentators as a source for defamatory statements aimed at the community. Furthermore, MAC has had systemic difficulties in conducting routine banking arrangements in Canada. We have learned the cause of these banking service denial issues is a report by a financial due diligence company called Refinitiv, which provides due diligence services to Canadian banks. Refinitiv’s latest (2018) report on MAC includes the following:

[SANCTIONS RELATED - INSAE-WC] This record meets the INSAE-WC inclusion criteria for EU, OFAC and UKHMT sanctions lists.[BIOGRAPHY] (Associated to sanctioned entity - reported 2015). Muslim non-profit organisation provides funding to International Relief Fund For The Afflicted And Needy-Canada and indirectly to Hamas (sanctioned entity) (reported Jan 2015). (...) [REPORTS] Jan 2015 - allegedly involved in financing the International Relief Fund for the Afflicted and Needy-Canada (IRFAN-Canada) (CAD296,514) (2001-2010) (Project Sapphire). (emphasis added)

¹ <https://torontosun.com/2015/01/29/muslim-group-linked-to-terror-organization-buying-buildings-across-canada/wcm/d9e2a616-ee8d-497a-a190-c8cd09796a16>.



Refinitiv has confirmed to MAC that:

- the negative findings in the 2018 Report are based solely on the 2015 Article referencing the leaked RCMP search warrant, and
- it would take new information to displace the content of the 2015 Article from the 2018 Report, such as a confirmation by the RCMP that MAC is not under investigation.

As you can plainly see from the Refinitiv report, the 2015 Article and its leaked Project Sapphire content continues to severely prejudice our organization. The RCMP must clarify the record. In the five years since the 2015 Article, MAC has been told that the RCMP would neither confirm nor deny whether MAC was ever or is still under investigation, even though MAC's reputation was damaged by the leak of the RCMP warrant.

We respect the role of the RCMP in safeguarding Canada through its work. We do not believe that this requires or justifies damaging the reputation of a community of over 100,000 Canadian Muslims with the insinuation of a never-ending investigation, leaked to the press.

We have two requests from your office. First, to advance a conversation between the RCMP and MAC about this subject and identify a solution to end the continuing reputational damage caused by the 2015 Article and the leaked search warrant. We seek your cooperation in assisting MAC to get the answers we deserve. We hope that by resolving this issue, we can mitigate the unintended impact of the conscious or unconscious bias that has permitted our organization to live under a cloud of suspicion for more than five years since the leak of the Project Sapphire warrant and the resulting 2015 Article. Second, we seek to establish a long-term positive two-way consultative relationship with your office to assist the RCMP in its outreach and understanding of the Canadian Muslim community.

Yours very sincerely,

Sharaf Sharafeldin
Executive Director
Muslim Association of Canada