

# Annex JJ



On September 21, 2013 a police officer from the Timmins Police Service stopped a vehicle for a traffic infraction. The driver produced an MMAR ATP in the amount of 2,400 grams. The driver stated he had authorization to transport more marihuana but stated he forgot the documents at his residence. Police confirmed with Health Canada that the driver was authorized to possess 2,400 grams. The medical marihuana in his possession was 3,610 grams which is 1,210 grams over his authorized possession amount.

# Annex KK



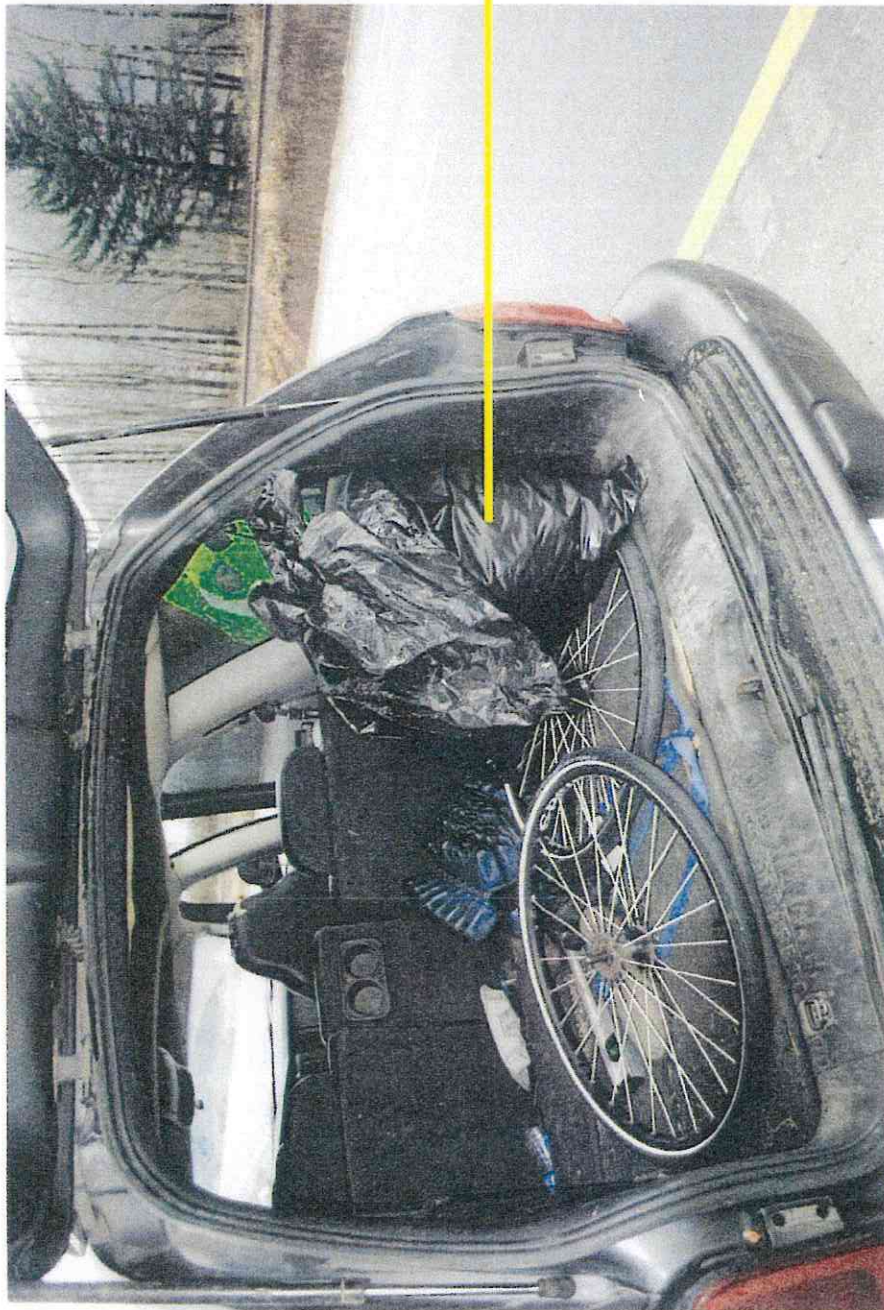
Police officers from the RCMP's Fraser Valley Traffic Services Section stopped a vehicle for a seatbelt infraction. One of the occupants produced an MMAR license that permitted the possession of 1,200 grams. Seventy Ziploc bags of marihuana were located. The MMAR license holder had 34 pounds worth approximately \$68,000 and over \$4,000 in cash. This possession amount is 12 times over his authorized legal possession amount.

# Annex LL



Police officers from the RCMP's Fraser Valley Traffic Section stopped a vehicle for speeding. One of the occupants produced a MMAR production license permitting him to grow 98 plants, and possess 600 grams. A garbage bag located on the backseat contained sixteen (16) Ziploc bags each containing approximately ½ pound of medical marihuana. This possession amount is approximately 12 times over his authorized possession amount.

# Annex MM



A vehicle was stopped for speeding and the police officer arrested the driver for possession of a controlled substance. A garbage bag was located in the back of the vehicle that contained twenty-two (22) Ziploc bags, each containing approximately ½ pound of marijuana valued at approximately \$22,000. The driver stated he was in the process of getting an MMAR license and an incomplete MMAR application was located in the vehicle.



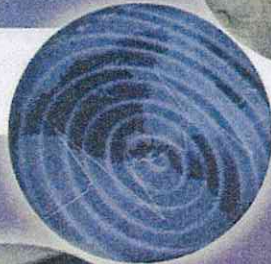
# Annex NN



Royal Canadian Mounted Police  
Criminal Intelligence Brief

**Criminal Exploitation of Marihuana Medical  
Access Regulations Licences**

May 23, 2012



Financial Crime  
International Operations  
**Drugs & Organized Crime**  
Border Integrity  
Operational Intelligence



## Key Findings

- Criminal networks are currently exploiting weaknesses in Health Canada's *Marihuana Medical Access Regulations* (MMAR) Program to produce and divert medical marihuana into the illicit market.
- Criminal networks are utilizing associates and family members who do not have police records in order to circumvent Health Canada's current safeguards for the production of medical marihuana.
- Intelligence and law enforcement investigations demonstrate that high-level criminal organizations engaged in illicit drug markets (cocaine, methamphetamine and marihuana) are actively strategizing to enter and exploit Health Canada's developing MMAR Program.
- Canadian criminal networks engaged in the illicit marihuana market have access to millions of dollars of startup capital. As such, they have the financial resources to commercially enter a sophisticated MMAR Program.

## Purpose

This assessment examines vulnerabilities within the MMAR Program as it pertains to production licences currently being exploited by organized crime (OC).

## Background

Canada was identified as a global top 10 producer of illicit marihuana.<sup>1</sup> Organized crime is involved in all levels of the marihuana trade (from production to exportation) as it remains one of the most trafficked illicit drugs within the country.<sup>ii</sup> Canadian criminal producers have developed the capacity and sophistication to produce on a commercial scale some of the most potent marihuana in the world. The illegal marihuana market in Canada is estimated to be a multi-billion dollar industry, in annual revenue, for criminal organizations.<sup>1 iii</sup>

Gaining access to or control of a medical marihuana grow operation is highly desirable for criminal networks due to the array of opportunities it would present for the illicit production and diversion of high-grade medical marihuana. Criminal groups are currently exploiting Health Canada's MMAR Program. The RCMP reported that at least one high-level criminal organization – identified as a national level threat – is proactively seeking opportunities to exploit future MMAR guidelines currently being developed by Health Canada.

## Occurring Threats

The following case studies are recent examples of investigations into broader ongoing organized crime trends identified by law enforcement in the RCMP's report *Analysis of National Cases Related to the Marihuana Medical Access Regulations (2010)*. Organized crime's exploitation of current and future MMAR represents an enforcement challenge and a public health threat.

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<sup>1</sup> *Marijuana Growth in British Columbia (2004)* estimated that British Columbia exported \$2 billion CDN worth of marijuana to the United States based on 2000 data.

## Scenario 1: Marihuana production in excess of the MMAR licence designation

### CASE STUDY 1

FILE NUMBER(S): 2011-XXXX, 2011-XXXXXX

**Issue:** *Suspect 1* was issued a licence to produce medical marihuana. In late 2011, police entered *Suspect 1*'s residence and located a marihuana grow operation which was producing marihuana in excess of the quantity allowed under the Health Canada permit.

**Criminal Background:** *Suspect 1* was arrested in 2011 for possession of over 100,000 MDMA (Ecstasy) tablets<sup>2</sup> and 30 kilograms of cocaine.<sup>3</sup> This individual is known to be a key cocaine importation and trafficking figure, is reportedly associated to a known violent organized crime group, and is an associate of a high-level (95 kilograms+) international cocaine trafficker.

**Implications:** High-level drug traffickers, who have access to significant amounts of capital, are currently exploiting Health Canada's MMAR Program.

## Scenario 2: Criminal participation in a medical marihuana grow operation

### CASE STUDY 2

FILE NUMBER(S): 2011-XXXXX, 2011-XXXXX

**Issue:** In 2011, police attended Address 1 where three individuals –*Suspect 2*, *Suspect 3* and *Suspect 4* – had MMAR licences to grow 49 plants each at this location, totalling 147 plants. *Suspect 3*'s and *Suspect 4*'s residential addresses were identified in other cities,

<sup>2</sup> This was estimated to be worth \$500,000 CDN, at the wholesale value, and approximately \$2 million CDN at the street value.

<sup>3</sup> The cocaine seizure was estimated to be worth \$1.65 million CAN, at the wholesale value, and in excess of \$2.5 million CDN, at the street value.

differing from the declared MMAR location. At a later date police conducted a roadside check of a vehicle which *Suspect 3* was driving. This vehicle was found to be transporting marihuana. *Suspect 3* indicated to officers that they were permitted to possess marihuana due to the MMAR licence. When questioned about the ownership of the vehicle, *Suspect 3* provided false information, likely in an attempt to prevent police from identifying the owner. The actual owner of the vehicle has several criminal convictions, one of which is believed to be associated to an illicit marihuana grow operation.

**Criminal Background:** *Suspect 2* is a full-patch member of the Vancouver Chapter of the Hells Angels. *Suspect 3* has a criminal record dating back to 1965 and is a known marihuana/hashish importer/trafficker. *Suspect 4* has no criminal record.

**Implications:** This example highlights the access criminal organizations have to associates with no criminal records. Organized crime often utilizes the services of individuals with no criminal convictions to hold permits or be the public owner of the business(es). This technique insulates the organized crime figure and helps to avoid detection by law enforcement. Organized crime members and associates are exploiting MMAR licences in order to traffic marihuana. There is no method for law enforcement to determine the legality of the marihuana being transported.

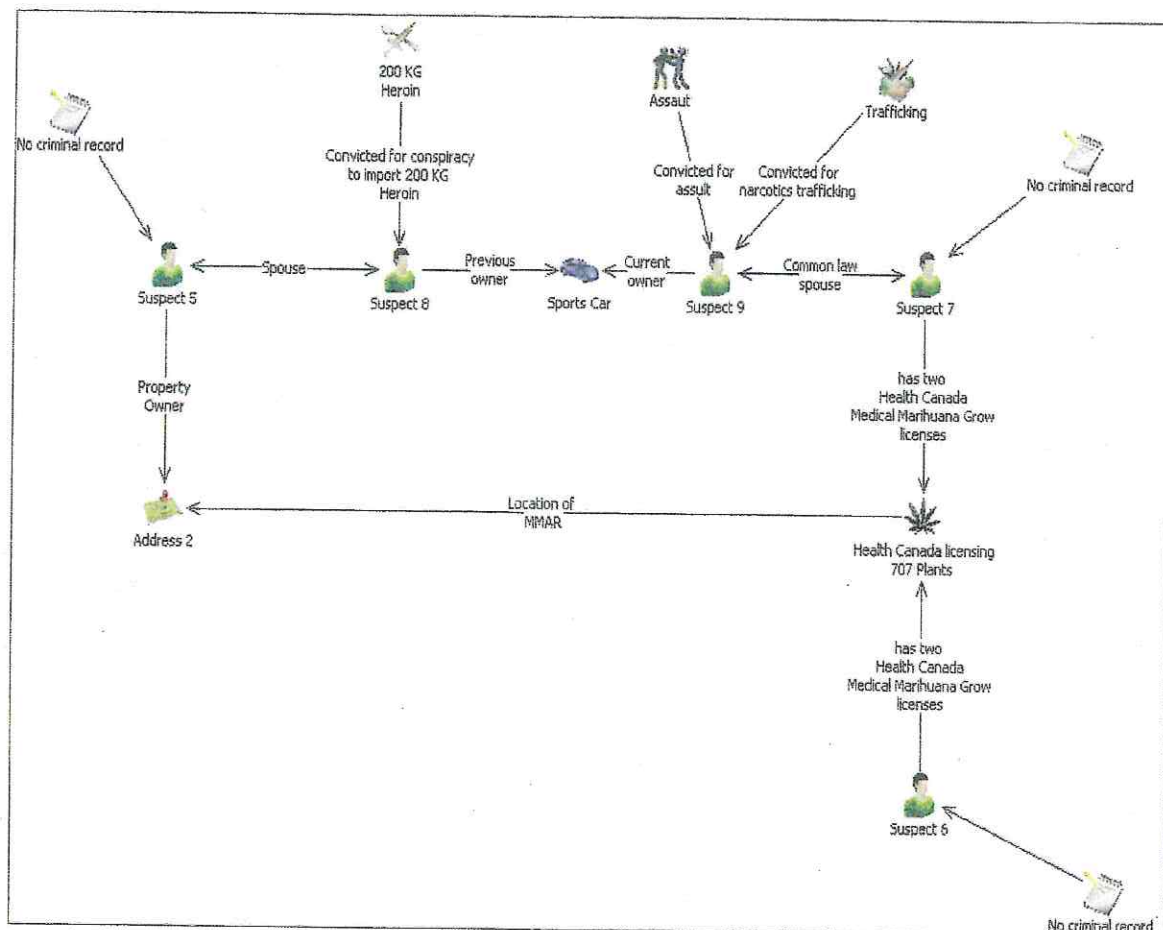
### CASE STUDY 3

FILE NUMBER(S): 2011-XXXXX, 2011-XXXXX

**Issue:** Address 2, owned by *Suspect 5*, is a known medical marihuana grow operation with four licences associated to *Suspect 6* and *Suspect 7*. Health Canada issued Designated Personal Production Licences (DPPL) to *Suspect 6* for 74 plants, and *Suspect 7* for 633 plants.

**Criminal Background:** *Suspect 5* has no criminal record, however *Suspect 5's* spouse, *Suspect 8*, served a sentence for conspiracy to import 200 kilograms of heroin from Pakistan. *Suspect 7* has no criminal record, while *Suspect's 7* common-law spouse, *Suspect 9*, is the registered owner of a sports car previously registered to *Suspect 8*. Higher value assets, such as vehicle ownership, are often exchanged among participants in the illicit drug market as a covert form of payment.

**Implications:** This case study demonstrates the ease by which ineligible individuals (such as convicted drug traffickers) can circumvent standard safeguards currently utilized by Health Canada. Under the current framework, individuals who are inadmissible to the MMAR program are having family members (such as a spouse) and/or associates with no criminal records obtain MMAR licenses



### Scenario 3: Criminal networks deliberately utilizing Health Canada MMAR licences to commercially produce illicit marihuana

#### CASE STUDY 4

FILE NUMBER(S): 2011-XXXX, 2011-XXXX, 2011-XXXX

**Issue:** *Suspect 10* holds a valid Health Canada licence to possess 1.8 kilograms of marihuana, to grow up to 292 plants and to store 13.14 kilograms at Address 3. *Suspect 10*'s licence is for personal use, it does not permit the supplying or growing of marihuana for others. *Suspect 10* established Company X, which illegally produces and ships marihuana across Canada.

There is a second licence for *Suspect 11*, who is also associated to Address 3. The licence only permits *Suspect 11* to supply *Suspect 12*. *Suspect 10* is an officer of Company X while *Suspect 12* is the director. Company X is sending significant quantities of illicit marihuana through Canada Post.

**Marihuana Seizure:** While conducting parcel interdiction at a major international parcel delivery company, police interdicted a package that contained 36 bags of marihuana, each weighing approximately 260 grams (for a total of 9.36 kilograms). The sender was Company X, which used the same address associated with *Suspect 10*, and the receiver was *Suspect 12*. Police were advised that *Suspect 10* inquired about the parcel with the company's corporate security department, saying that the marihuana was for medical purposes. When police spoke with *Suspect 10*, he stated that he was part of Company X and that the marihuana was for a licenced medical user.

**Business Profile:** Company X has a website claiming to be "permitted to produce and distribute marihuana for medical purposes." When police verified with Health Canada, it was indicated that no licence was issued for

Company X to distribute marihuana but rather the owner, *Suspect 10*, had a Personal Use Production Licence. *Suspect 10* was featured in a National Geographic documentary called "Marihuana Nation." Mark Emery (aka the Prince of Pot and well known marihuana activist) took a National Geographic reporter to *Suspect 10*'s medical marihuana grow operation (MGO) in Canada. Emery stated it was the biggest and most sophisticated MGO he had ever seen. *Suspect 10* then showed the reporter the warehouse where marihuana plants (approximately 10 feet tall) were grown and concluded the presentation with showing cookies and cupcakes<sup>4</sup> containing marihuana.

**Criminal Background:** In the documentary, *Suspect 10* admitted to having a criminal record for trafficking and extortion. The Canadian Police Information Center showed that *Suspect 10* is prohibited from possessing firearms stemming from a 1988 file; however, no criminal record was listed due to a possible pardon.

**Implications:** This example is one of several where MMAR licences are utilized with impunity to produce a significant quantity of marihuana, far exceeding what can reasonably be consumed by an individual. RCMP subject matter experts report the average yield per plant to be 90 grams (average plant size is 5 to 8 feet tall). As such *Suspect 10*'s licence for 292 plants allows the production of at least 78.84 kilograms - with an average street value of \$657,000 CDN – per annum.<sup>5</sup>

<sup>4</sup> At the time of filming this contravened Health Canada's *Marihuana Medical Access Regulations*, which restricted recipients to using only dried forms of marihuana.

<sup>5</sup> Average yield per plant is 90 grams; therefore 292 plants will produce 26.28 kilograms. Most growers can rotate at least three crops per year (26.28 kg x 3= 78.84 kg).

**CASE STUDY 5**

FILE NUMBER(S): 2010-XXXX, 2011-XXXXX,  
2012-XXXX, 2012-XXXX

**Issue:** Intent by known organized crime individuals to obtain marihuana production licenses for medical purposes.

**Criminal Modus Operandi:** In June 2010, a specialized police outlaw motorcycle gang unit began an investigation into the criminal production of marihuana by *Suspect 13* and associates. *Suspect 13* worked for *Suspect 14*, a full member of the Hells Angels, White Rock Chapter. The investigation led to the search and seizure of three large-scale, commercial-grade, illegal MGOs in Chilliwack, Hope and Mission. Each location was maintained by a separate group of people, with *Suspect 13* in charge of each group.

Subsequent to the seizures, intelligence indicates that *Suspect 14* is planning to criminally produce marihuana under the cover of medical grow licences. In 2011, *Suspect 13* and two persons from his production network, *Suspect 15* and *Suspect 16*, are believed to have applied for medical marihuana licences. Another subject of this investigation, *Suspect 17*, was arrested by a municipal police service on 2012-01-10 at an illegal MGO that was operated by a person who had a valid medical marihuana licence for another address.

**Implications:** Criminal networks active in the production of marihuana for the illegal market currently view the MMAR Program as a highly desirable mechanism by which to produce illicit marihuana and circumvent law enforcement.

**Strategic Considerations**

Criminal organizations are highly likely to attempt to gain access, either directly or indirectly via associates who do not have a criminal record, to businesses or designated locations producing medical marihuana under Health Canada's MMAR Program.

The RCMP Criminal Intelligence deems that a criminal records check of applicants attempting to obtain production licences is insufficient in reducing the probabilities of exploitation by criminals.

A more comprehensive background screening of individuals to identify criminal associations would greatly contribute to mitigating the risks of exploitation, such as the RCMP's Security Intelligence Background Section (see Appendix A).

Health Canada currently utilizes databases, which identifies the locations and owners of MMARs. This database could be leveraged to identify questionable activity, such as individuals who reside in one municipality but are licensed and growing marihuana in another community. Developing core indicators of non-compliant medical marihuana grow operations could provide Health Canada with the resources to strategically target and deploy limited resources.

## Appendix A

### Security Intelligence Background Section (SIBS)

#### Mandate

The Security Intelligence Background Section (SIBS) has been established within the RCMP Criminal Intelligence Program to provide a security screening service to federal departments. The Security Intelligence Background Section produces comprehensive analysis of available police information about applicants, enabling client departments to accept or reject them for specific access or entitlement.

#### Law Enforcement Records Checks (LERC)

The Security Intelligence Background Section (SIBS) conducts Law Enforcement Records Checks (LERC) on names of individuals provided by a federal government department. The purpose is to determine if an individual has in the past engaged in and/or been associated to criminal activities that would indicate unacceptable risk for the client. A LERC involves a review of police databank holdings, and can result in either a "no hit", which is a search that yields no positive matches or in a "possible hit", which yields positive matches to information in the databases and requires further analysis. The Security Intelligence Background Section coordinates and conducts follow-up inquiries to confirm the accuracy and validity of the information, and then provides an assessment to departments or agencies of the Government of Canada.

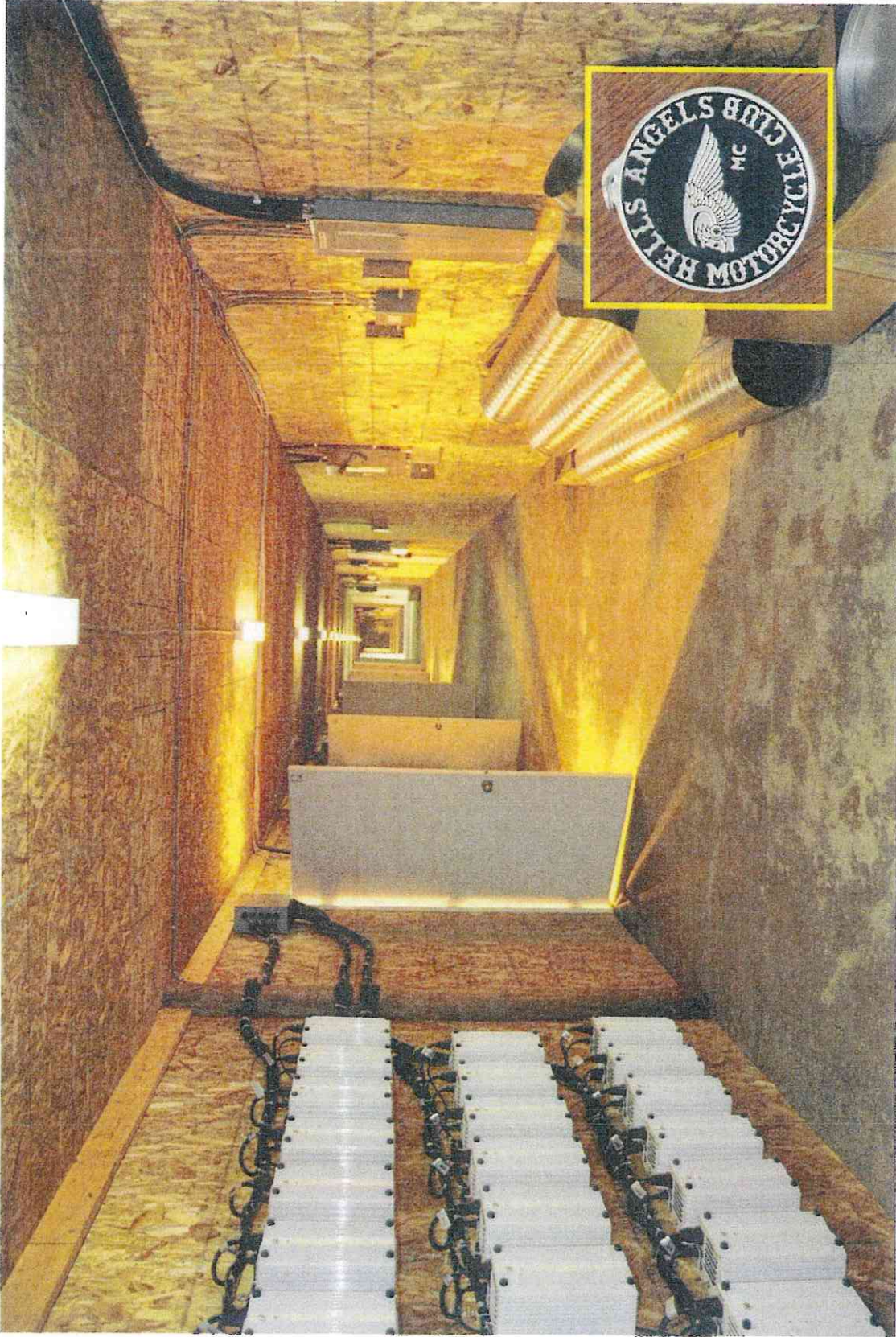


## Endnotes

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- <sup>i</sup> 2010 World Drug Report , 2010 United Nations Office on Drugs and Crime
  - <sup>ii</sup> 2010 Report on Organized Crime, Criminal Intelligence Service Canada
  - <sup>iii</sup> *Marijuana Growth in British Columbia* (2004), Public Policy Sources, Easton, Stephen T., The Fraser Institute;  
BBC, Canada's growing marihuana problem, 20 March 2006, <http://news.bbc.co.uk/2/hi/americas/4620272.stm>

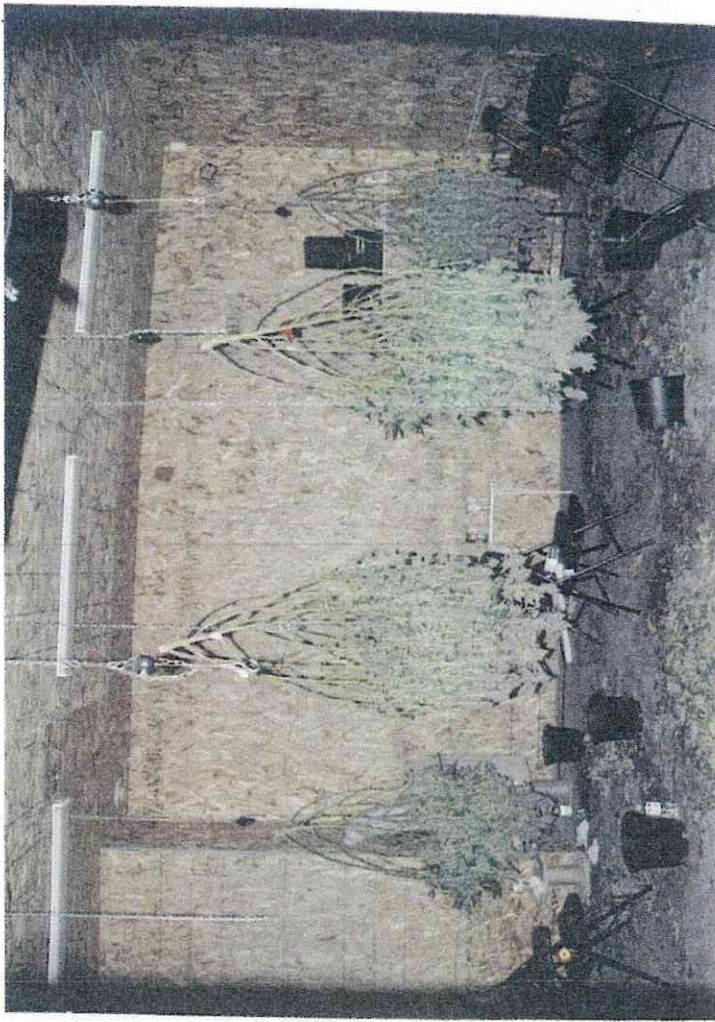
# Annex 00

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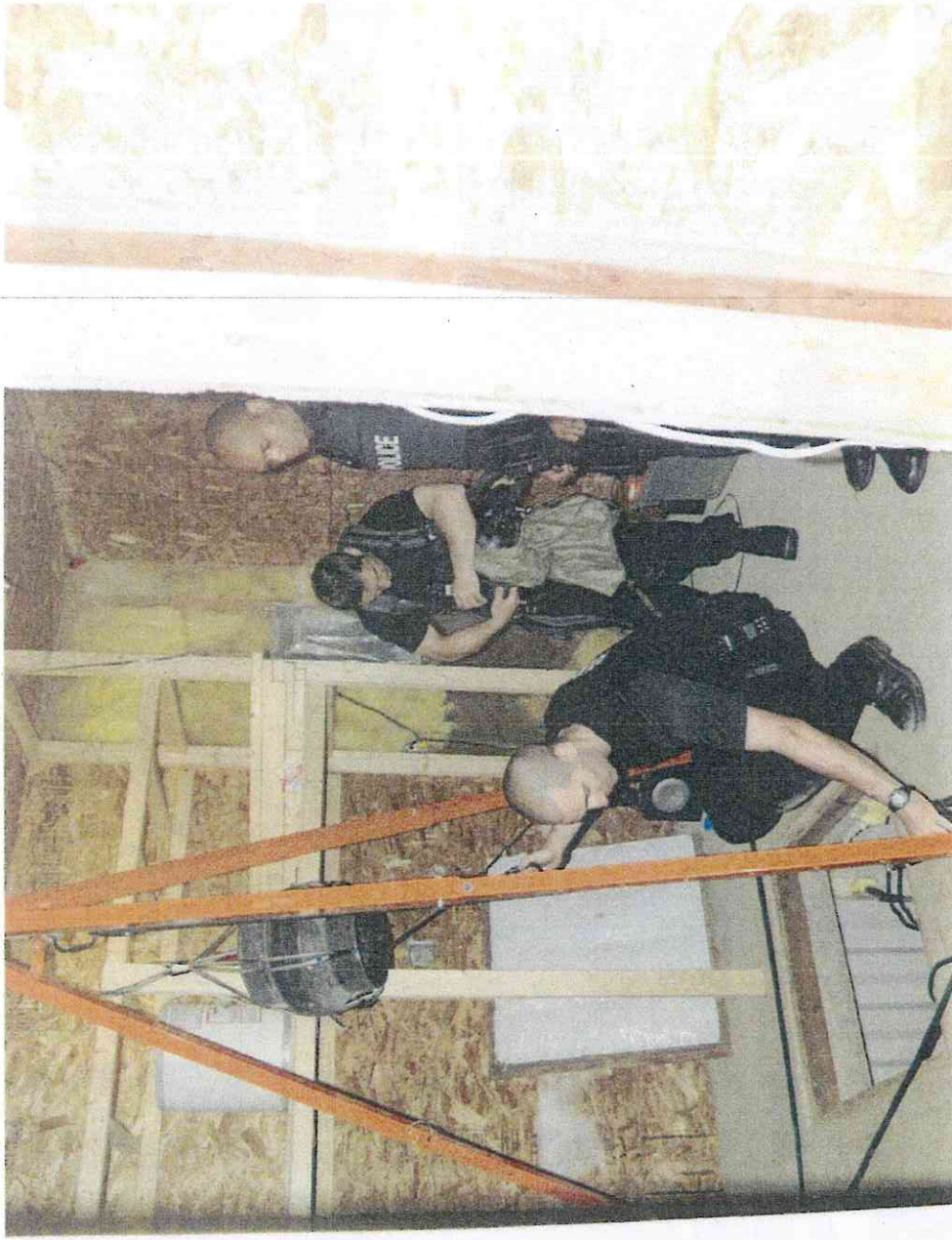
A search warrant was executed on a property in Maple Ridge, BC that was sub-divided into two properties permitting eight (8) MMAR production licenses for a total of 1,537 plants inside two chicken barns.

Inset photo: a medallion located on the kitchen table at the MMAR production site.



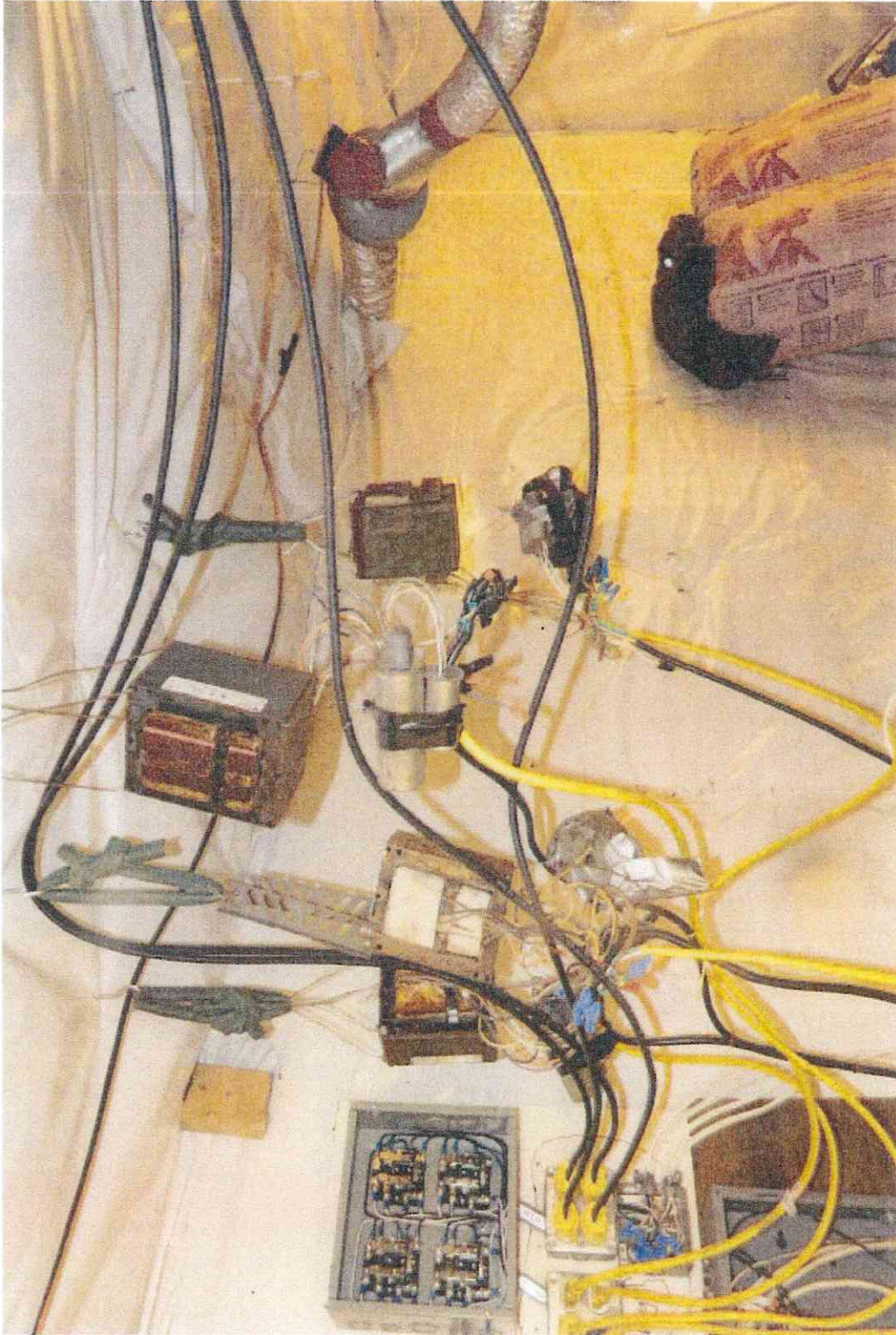
Photograph on the left: medical marijuana packaged on the racks. It is unclear which marijuana belonged to which license holder. Photograph on the right: Monster marijuana plants yielding over a pound of marijuana were being harvested. If this site continued with 3 crops a year, with the same yield, this MMAR production site could produce \$9.2 million dollars' worth of medical marijuana for 8 people's personal consumption.

# Annex PP



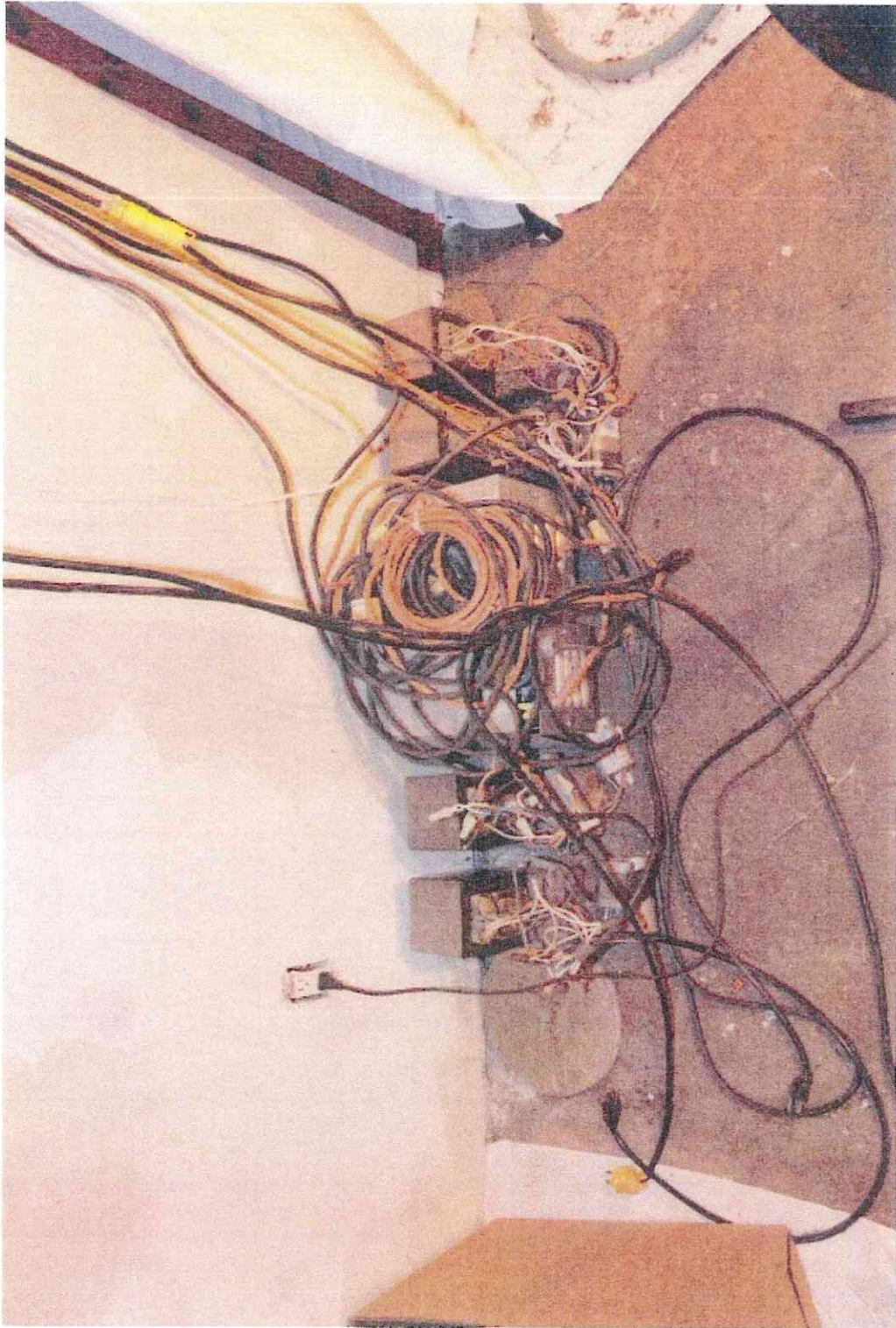
Medical marihuana at this MMAR production site was being grown in a sea container buried under the ground. The confined space contained diminished oxygen levels so police officers utilized a fan to add oxygen, wore CO2 monitors, and a harness retrieval system should they go unconscious. This equipment was brought by police and was not in practice by the MMAR producer who was growing plants in this dangerous space.

# Annex QQ

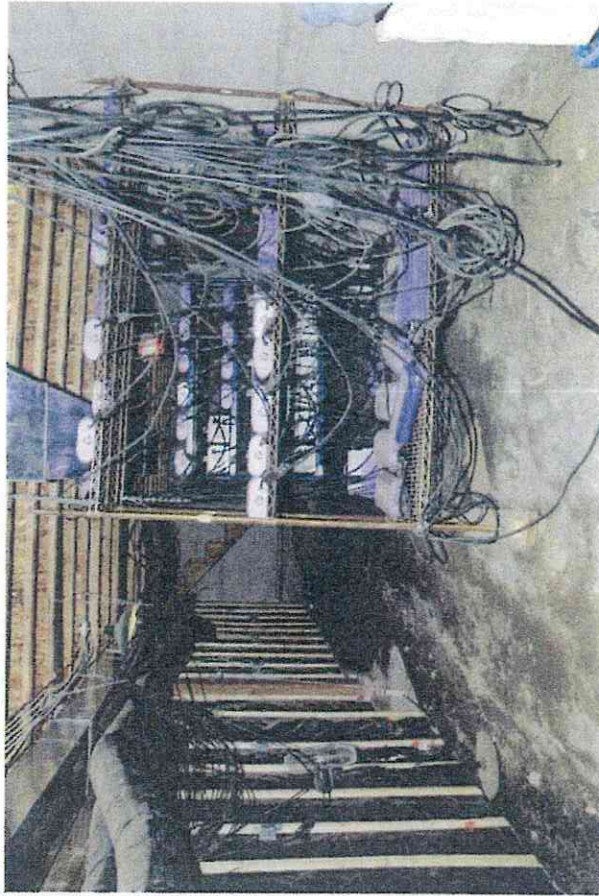
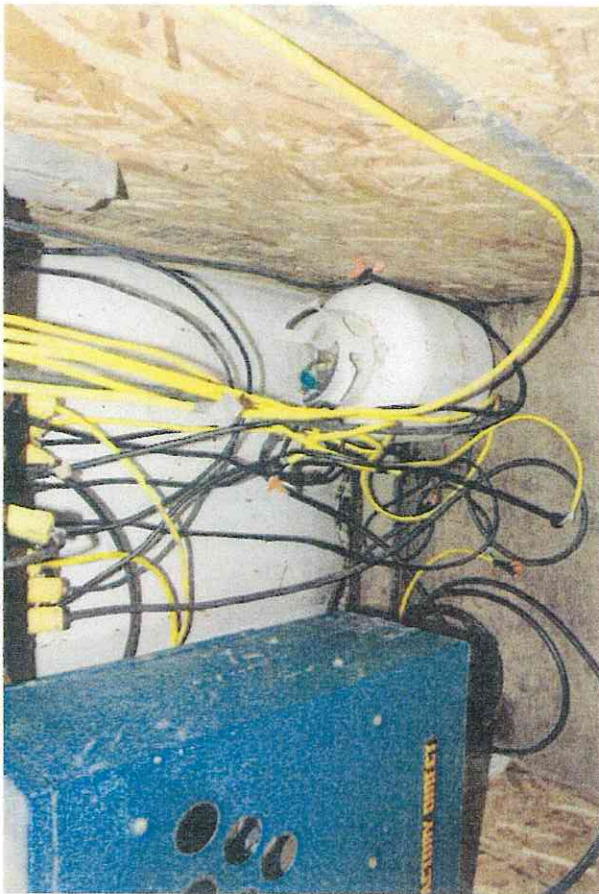


Above photograph was taken at a MIMAR production site. The electrical ballasts were precariously hung from the ceiling. Multiple electrical wires were spliced into extension cords to complete electrical circuits.





*Above photograph depicts multiple ballasts and wires on the floor inside a MMAR production site.*



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*Photograph on the left depicts multiple wires spliced together around a propane tank that is connected to a CO2 burner.*

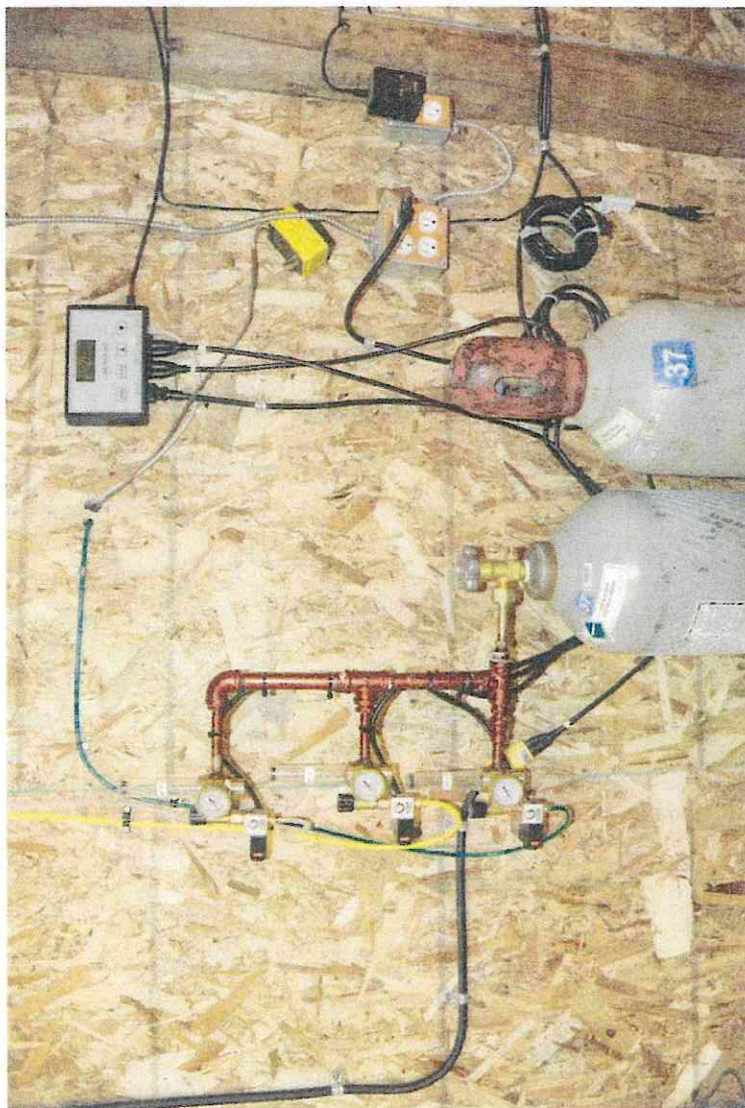
*Photograph on the right depicts a rack of electrical ballasts with a myriad of wires in the crawl space of a residence.*

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Above photograph depicts a 220 gallon (830 litre) tank of water adjacent to electrical ballasts on the ground. The water reservoir had no lid and was connected to a tap on the wall.

# Annex RR



*These commercial size CO2 tanks were located at a MMAR production site. Inadequate monitoring and leak testing could result in the exposure of fatal doses of CO2.*

# Annex SS



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*A bullet proof vest and high capacity magazine along with a numerous firearms were seized at this MMAR production site.*

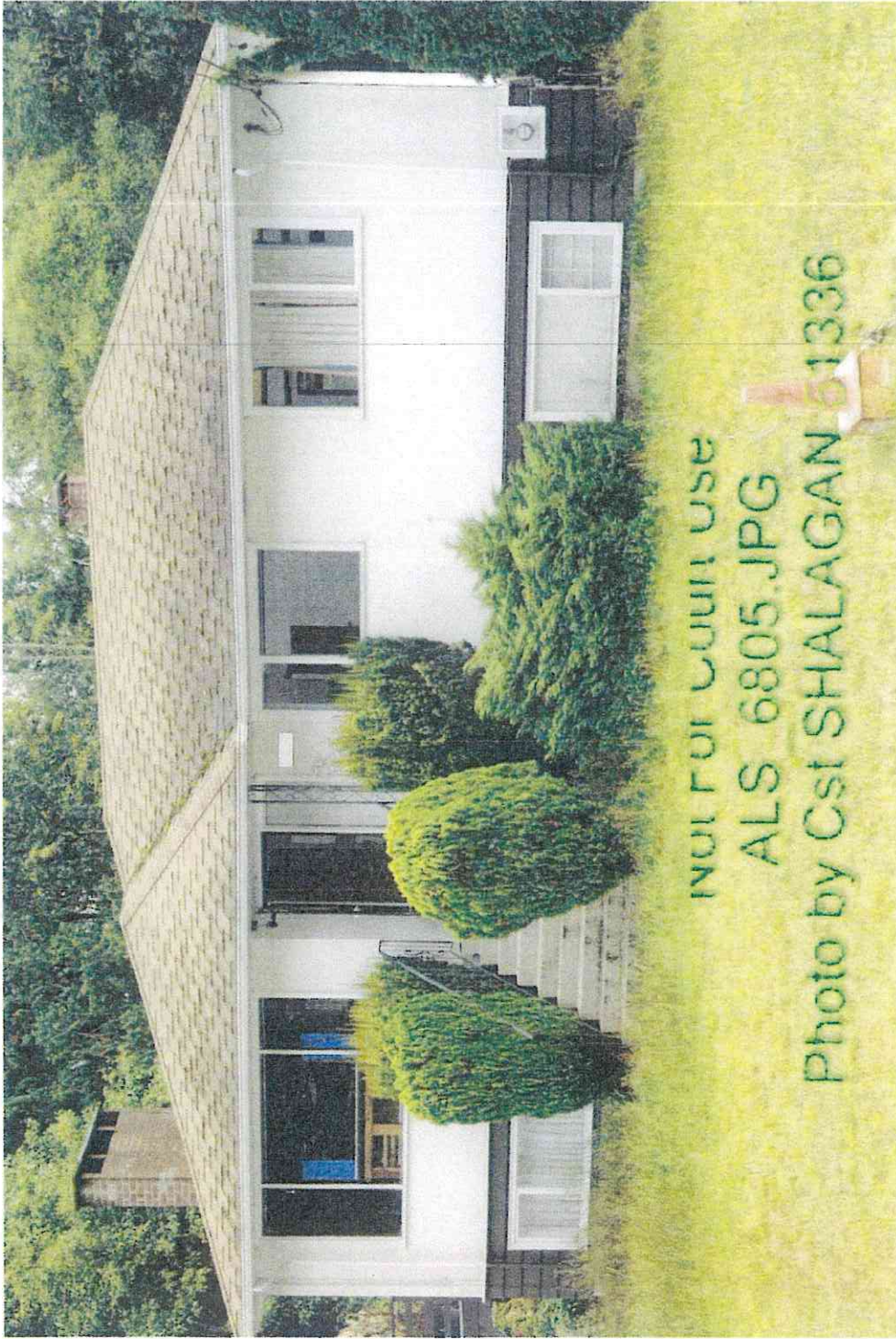
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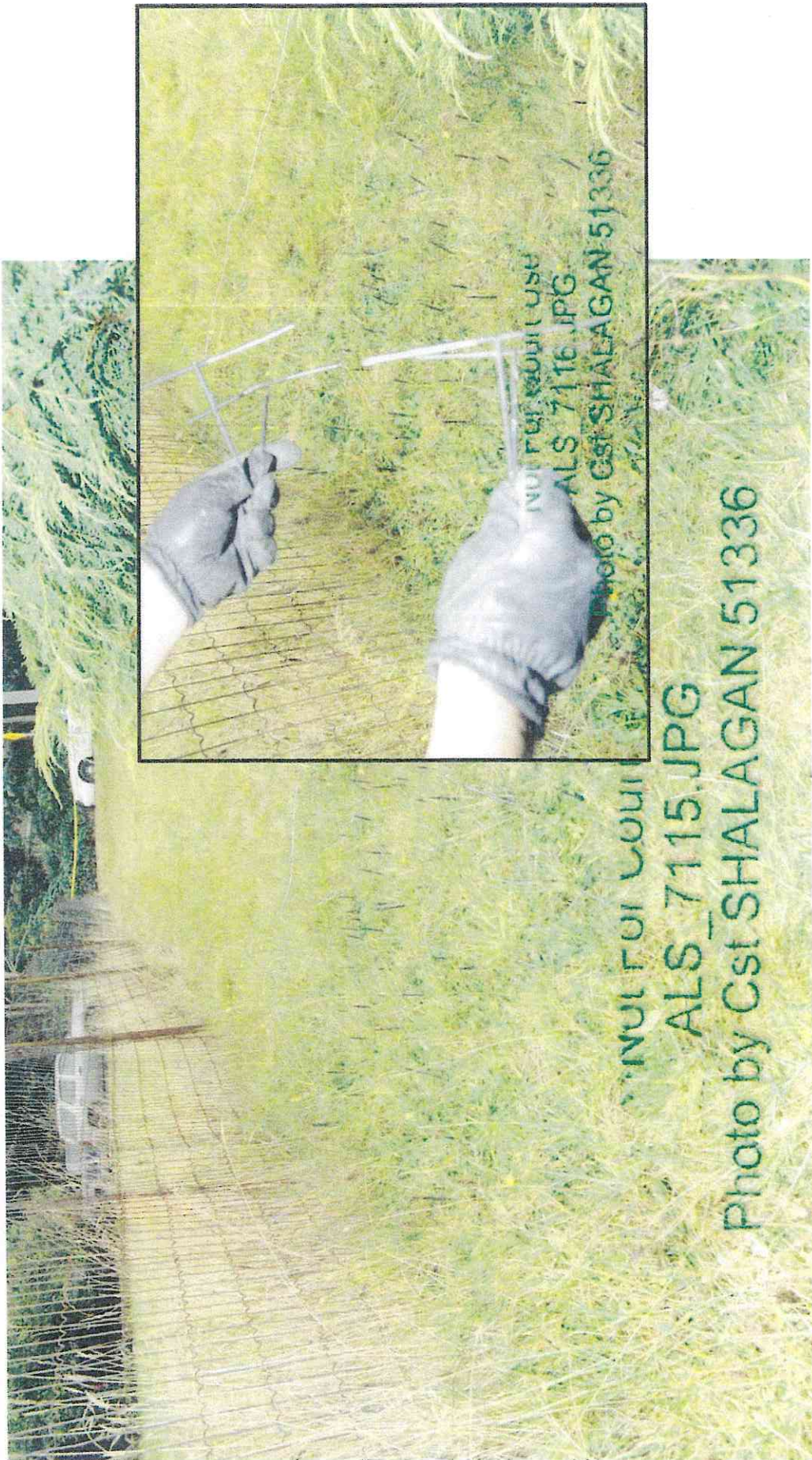
Photographs of the firearms at a MMAR production site.



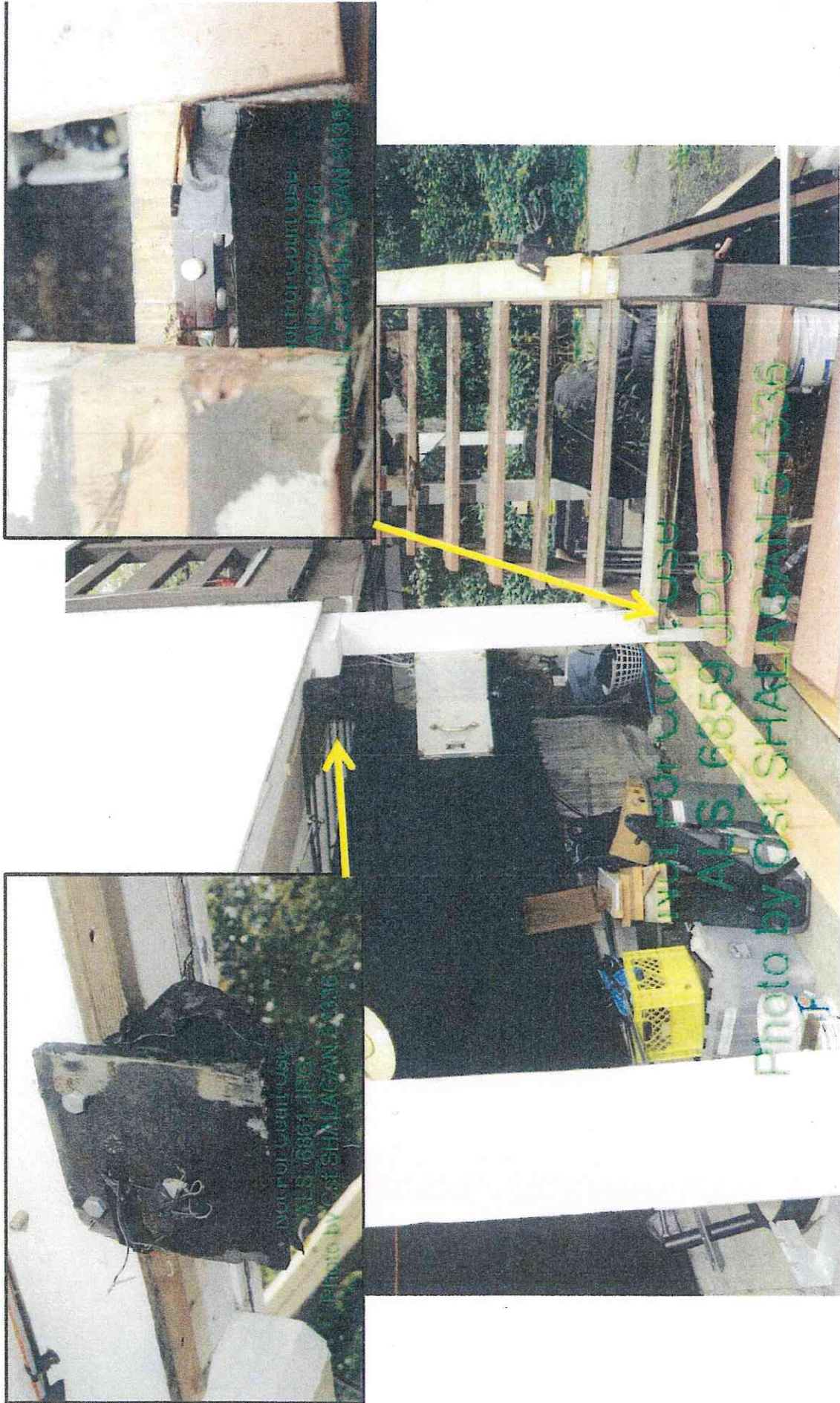
# Annex TT



The above photograph depicts a typical residence, however there are numerous disguised booby traps at this MMAR production site. Metal brackets were bolted to the wall behind the front door where two 2x4 boards of wood acted as cross braces to prevent entry.



Steel spikes were joined in an "H" pattern and then bent up. This would prevent the spikes from bending over or sinking deeper in the ground if stepped on. These "Grass Spikes" were then dipped in paint to help obscure the shiny metal appearance and would easily penetrate a person's footwear.



A pressure sensor was mounted under the stair platform and connected to a flash bang device.



A device the homeowner called "Robogun" was mounted just under a second story window. It was an articulating arm from an electric motor used to raise and lower vehicle windows. The "Robogun" contained 14 Roman candle fireworks taped together. The device was powered, and monitored by video in a command center inside the reside which gave the MIMAR producer the ability to aim the "Robogun" at would-be intruders.



If the suspected intruders made it past the "Robogun" and the pressure sensor in the stairs, there was a "Nail Cannon" mounted in a green storage bin on the 2<sup>nd</sup> floor deck. The "Nail Cannon" would use a piece of round wood in the barrel (acting as wadding) followed by 6" long nails. The pneumatic ram would allow the remote opening of a ball valve and release a burst of air that would propel a handful of nails into the legs of any would-be intruders.



*At the top of staircase was an improvised "Flame Thrower". An electronic actuator would allow for remote activation of a fire extinguisher filled with propane.*



Another "Flame Thrower" was located at the back door to the MMAR production site. This one consisted of two pipes connected to a propane tank that utilized an electric actuator. Each pipe was rigged with electric flash pots.

The MMAR producer could remotely activate this "Flame Thrower" from within a command centre.

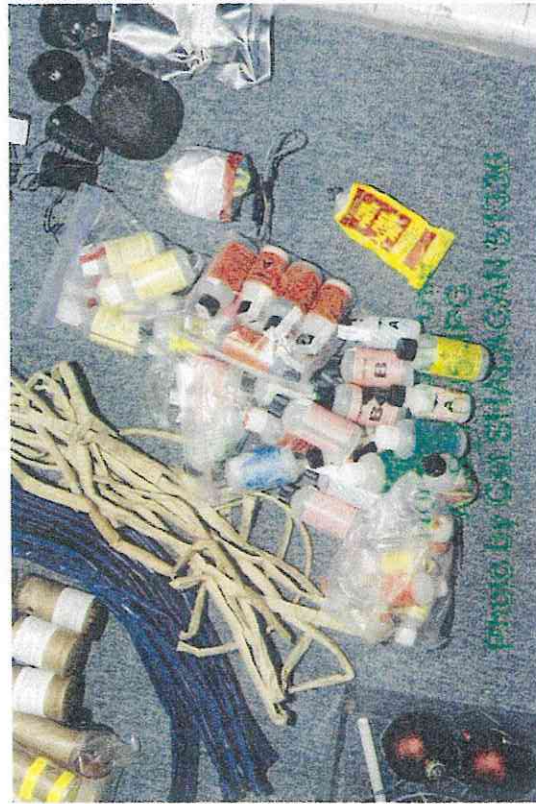
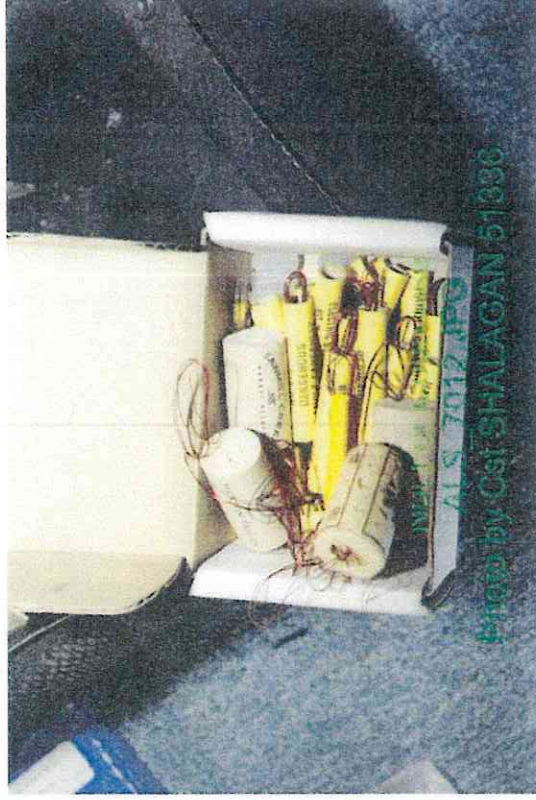




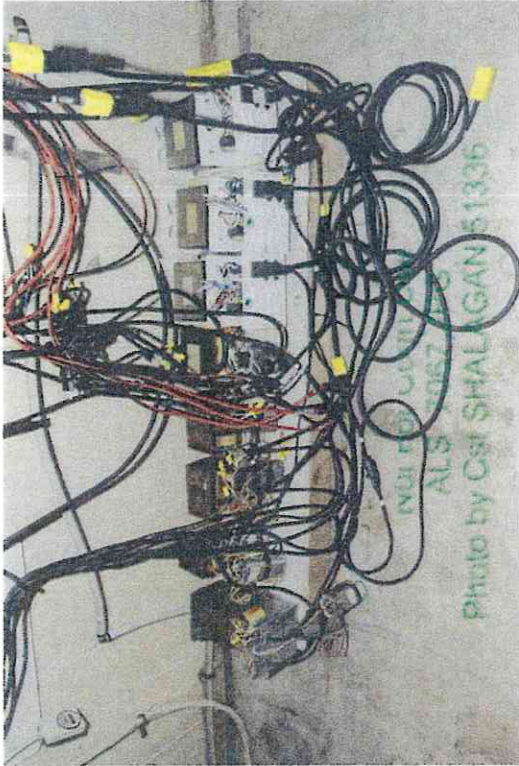
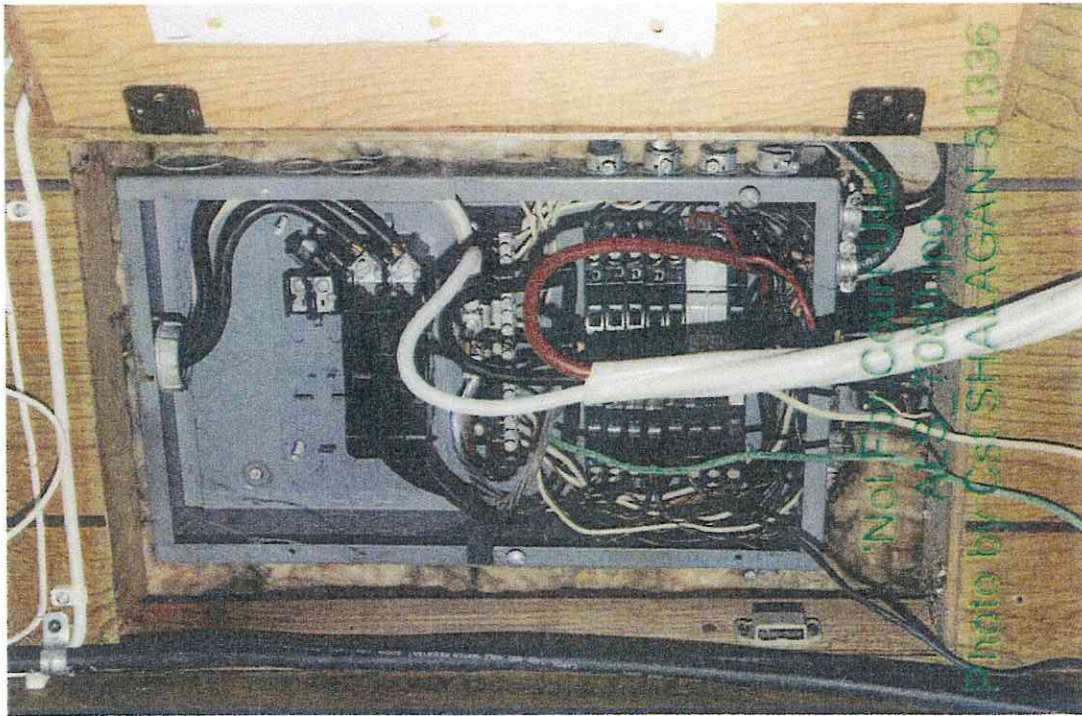
The back door contained a metal cage door. On the metal door was a sticker over the peephole that stated, "Keep BC Rat Free". Behind the sticker was a "Peephole Spike Gun." A metal spike with packed into the pipe that contained an electric detonator. Below the sticker was another sticker that stated, "Welcome to hell, Boom Boom, out go the lights."



Photographs of the command centre inside the MMAR production site. Numerous TVs were connected to the hidden video surveillance system for the perimeter of the property. Also inside the room were drying racks with marijuana residue, a crossbow, compound bow, razor tipped arrows, throwing knives, a bullet proof vest, and four Improvised Explosive Devices (IED.)



Additional explosive devices were located in the room adjacent to the command centre inside the residential MMAR production site.



Exposed electrical wiring, potential tripping hazards and a CO2 generator were located in this MMAR production site.

Marihuana was being grown in soil beds in the basement.

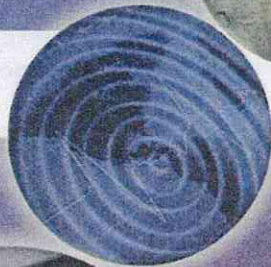
# Annex UU



Royal Canadian Mounted Police  
Criminal Intelligence Brief

# Marihuana Grow Operations and Related Violence in Canada

April 2012



Financial Crime  
International Operations  
**Drugs & Organized Crime**  
Border Integrity  
Operational Intelligence



## Key Findings

- Theft or destruction of illegal marihuana crops (grow rips) are under-reported due to the victims' participation in criminal activity. (A)
- There is no clear way to categorize a grow rip in the various law enforcement records management systems as it is not a specific offence and does not have an Uniform Crime Reporting code. (A)
- The lack of precision in the available reporting does not permit clear analytic judgments regarding the issue of violence in grow rips. However, violence continues to be part of the illegal drug trade and is associated to the presence of marihuana grow operations in Canada. (A)
- The risk of violence associated to legal marihuana grow operations in residential settings will continue pending changes to the *Marihuana Medical Access Regulations*. (A)

## Purpose

This assessment is the first review of violent criminal activities linked to marihuana grow operations (MGOs), specifically MGO-associated home invasions and grow rips.<sup>1</sup> (A)

## Background

The Canadian Association of Chiefs of Police (CACP) identified the presence of MGOs and their potential threat to public safety as a priority issue and requested an assessment. The significant role of organized crime and violence in MGOs, highlighted in the 2002 RCMP Project SERRE II report examining marihuana cultivation trends in Canada, holds true today.<sup>2</sup> Accordingly, organized crime's involvement in marihuana production due to its profitability and lack of deterrence renders it a widespread problem in Canada. Violence continues to be a part of the illegal production, trafficking and distribution stages of the drug trade, and is associated with the presence of MGOs. The violence has not however limited itself to illegal MGOs; legal MGOs,<sup>3</sup> allowed in Canada since 2001 under the *Marihuana Medical Access Regulations* (MMAR), were also found to increase the risk of home invasions and violence.<sup>1</sup> (A)

Illicit marihuana grow operations are known to be operating in all provinces across the country, but are more common in British Columbia (B.C.), Ontario, and Quebec.<sup>ii</sup> The dominance of B.C. in the marihuana market was initially reported in 1995 with the dramatic increase in hydroponic marihuana cultivation, and continued in 2000 when nearly half of marihuana cultivation incidents in Canada originated from this province. British Columbia remains at the forefront of this illicit drug activity.<sup>iii</sup> (A)

<sup>1</sup> Grow rips are defined as MGOs targeted by criminals who commit a home invasion in order to steal or destroy the marihuana crop.

<sup>2</sup> In 2010, Canadian law enforcement seized approximately 1.9 million plants and 50,000 kilograms of marihuana, which remains the largest illicit commodity seized in the country. (See *Chart 1, Appendix A*.)

<sup>3</sup> A legal MGO, allowed in private residences, is licensed by Health Canada to legally grow marihuana for medical purposes. As of June 2009, 3,430 production licenses were granted for personal-use production licence and designated person production licence across the country.

## Methodology

In February 2011, at the request of the CACP, RCMP HQ Drug Branch canvassed CACP members to obtain information on all reported MGO-associated home invasions and grow rips that involved incidents of violence between January 2007 and August 2011.<sup>4</sup> This assessment is based on the analysis of 311 reported police files,<sup>5</sup> (See *Appendix B.*) where MGOs (both legal and illegal) were targeted for theft. Of note, 88 percent of the reported files were from B.C., followed by Ontario (7%), while Quebec, Nova Scotia, and Alberta combined accounted for the remaining five percent. (See *Chart 2, Appendix A.*) (A)

## Limitations

This analysis may not be a comprehensive representation of the country as the majority (273) of the files reviewed for this assessment originated from B.C.. (A)

Illegal marihuana grow operations related violence is under-reported (e.g. victims involved are unlikely to report occurrences due to the illegal nature of production), which is a significant challenge for collection and analysis. (A)

Incidents initially classified as a break and enter<sup>6</sup> could be unreported grow rips as there is no clear way to categorize it in law enforcement records management systems. A grow rip is not a specific Criminal Code offence and does not have a Uniform Crime Reporting (UCR) code,

<sup>4</sup> The original deadline for submission in this review was January 2011, which was later extended to August 2011.

<sup>5</sup> Participating Canadian police agencies included: British Columbia – Abbotsford Police Department; Delta Police Force; RCMP E Division; Saanich Police Department; and Vancouver Police Department; Ontario – Hamilton Police; Ontario Provincial Police; Ottawa Police Service; Peel Regional Police; Toronto Police Service; and Waterloo Regional Police; Quebec – Service de Police de la Ville de Montréal and Sûreté du Québec; Nova Scotia – RCMP H Division.

<sup>6</sup> *Criminal Code, R.S.C., 1985, c. C-46, s.348.*

making it difficult to accurately assess the scope of the problem. (A)

The overall lack of information and intelligence gathered from MGO-associated home invasions and grow rips makes it difficult to identify criminal patterns and the involvement of organized crime (OC) networks. (A)

## Analysis

### Violence

Some marihuana growers have used weapons/instruments<sup>7</sup> in their residences to protect their crop and prevent theft by rivals.<sup>iv</sup> (A)

### Illegal MGOs

The presence or involvement of weapons/instruments was reported in 36 percent (113) of the files reviewed, while injury to victims or suspects occurred in 25 percent (77) of the cases. In five percent (16) of cases, victims were shot or stabbed during an MGO-associated home invasion, resulting in five fatalities. Three percent (10) of files reported gunshots fired, but with no apparent injuries. (A)

### Legal MGOs - Marihuana Medical Access Regulations (MMAR)

Eighteen percent (55) of reported incidents of violence and home invasions associated to MGOs involved MMAR licensed grow operations.<sup>8</sup> While the majority of these cases were in B.C. (46), some instances were identified in Ontario (2), Alberta (3), and Nova Scotia (4). (A)

Of these 55 MMAR cases, injuries were sustained in 22 percent (12) while the presence or involvement of weapons/instruments was

<sup>7</sup> For the purposes of this assessment in addition to what is classified as a weapon (firearms and knives), instruments that can be used as a weapon such as pepper and bear spray, baseball bats, clubs/blunt instruments were included.

<sup>8</sup> Of these incidents, all but one involved an indoor licensed grow operation.



identified in 47 percent (26) of files. In 40 percent (22) of the MMAR files reviewed, some form of marihuana (either processed bud or plants) was stolen resulting in legal marihuana being diverted to the black market.<sup>9</sup> (A)

### Organized Crime Involvement

In five percent of cases (16), the MGO was known or suspected to be targeted by specific OC groups, including: Independent OC<sup>10</sup> (10), street gangs (3), Hells Angels (2), and Asian OC (1). Organized crime links are frequently not noted or collected during an investigation of an illegal grow operation as suspects are often not identified because victims either do not know or are unwilling to cooperate with police for fear of incriminating themselves. (A)

### Offence Type and Charges

Individuals involved in illegal MGOs are unlikely to file a complaint with police if their crop and/or money were stolen, if they were threatened, or if they were victims of violence.<sup>v</sup> As victims risk being charged for cannabis cultivation if reported to police, they frequently avoid or delay reporting in order to dismantle the MGO in their residence. In instances where victims did report the crime, some failed to provide complete or accurate information to avoid self-incrimination. As a result, the lack of reporting by victims is reflected in the reviewed files when attempting to ascertain the number of charges. (A)

Victims/complainants were commonly listed as involved in possession or production of cannabis, while suspects were likely listed as involved in a break and enter.<sup>11</sup> The majority of MGO-associated home invasions and grow rips

reviewed did not identify suspects, and even fewer resulted in criminal charges.<sup>12</sup> In the reviewed cases, there was a greater number of victims/complainants charged with cultivation offences because they were more frequently identified.<sup>13</sup> (A)

### Threat of MGOs in Residential Locations

The risk to the public can be elevated when criminals target for home invasion either the wrong address or one where a MGO was believed to be active, thus potentially endangering innocent parties. Ten percent (33) of files indicated that home invasions occurred at locations where MGOs are no longer active, or at incorrect addresses. It can be difficult to determine whether these cases involved a failed grow rip or were actually a break and enter, as demonstrated by investigator's comments (noted in the files) indicating some confusion in assessing what had occurred. (A)

Once identified as an MGO location by criminals, an address can be at risk of being the target of a future grow rip. Four percent (12) of files reported locations/addresses that were targets of repeated grow rip attempts. (A)

### Impersonating Law Enforcement

Impersonation of law enforcement by suspects attempting to access MGOs could compromise police ability to effectively operate in areas where misrepresentation has occurred, risking public safety. Four percent (11) of the files, all from B.C.,<sup>14</sup> revealed instances of suspects

<sup>9</sup> The quantity of stolen marihuana was identified in only 12 of the 22 cases.

<sup>10</sup> The independent OC groups include 'ripper' groups, which are organized crime groups known to steal or destroy a rival's crops.

<sup>11</sup> Break and Enter is defined as an unlawful entry to a; residential/commercial buildings, entry does not have to be obtained by force but may be accessed through an open or unlocked window/door.

<sup>12</sup> Of the 311 files, 220 cases provided offence type and identified whether there were charges. Suspects were identified in 19 percent (42) of files and only five percent (11) were charged.

<sup>13</sup> Of the 220 cases, 80 percent (175) identified the victims/complainants and 30 percent (52) were charged with cultivation offences.

<sup>14</sup> B.C. jurisdictions: Abbotsford, Burnaby, Ridge Meadow, Sunshine Coast, Upper Fraser Valley, and Vancouver.

## Appendix A

Chart 1 (A)

Canadian Marihuana Seizures by Year, 2007 – 2010		
Year	Number of plants	Marihuana (kg)
2007	1,878,178 plants	49,918 kg
2008	1,828,861 plants	37,169 kg
2009	1,845,734 plants	34,391 kg
2010	1,943,625 plants	50,676 kg

Chart 2 (A)

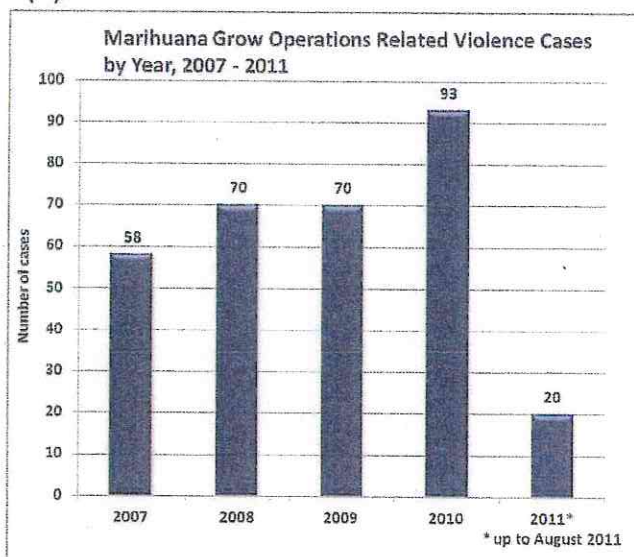
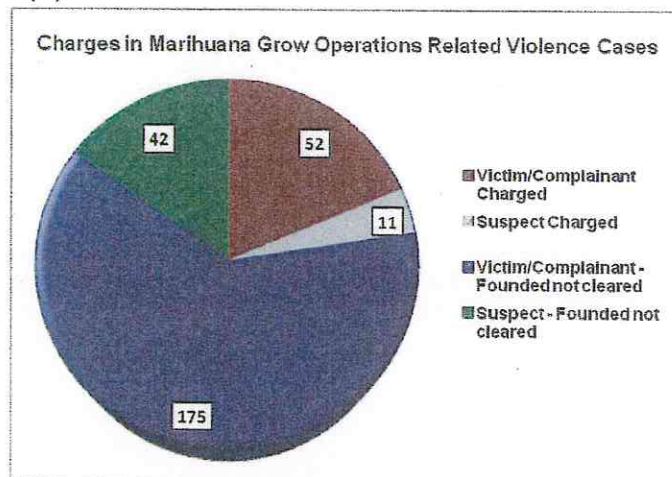


Chart 3 (A)



## Appendix B (A)

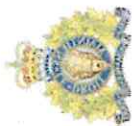
Marihuana Grow Operations (Illegal and Legal) and Related Violence Cases			
January 2007 – August 2011			
		Number of cases	Percentage
<b>Total number of reported marihuana grow operations cases</b>		<b>311</b>	<b>–</b>
<b>Provincial representation</b>	British Columbia	<b>273</b>	<b>88%</b>
	Alberta	<b>3</b>	<b>1%</b>
	Ontario	<b>23</b>	<b>7%</b>
	Quebec	<b>7</b>	<b>2%</b>
	Nova Scotia	<b>5</b>	<b>2%</b>
<b>Legal Marihuana Grow Operations</b>		<b>55</b>	<b>18%</b>
<b>Provincial representation</b>	British Columbia	<b>46</b>	<b>84%</b>
	Alberta	<b>3</b>	<b>5%</b>
	Ontario	<b>2</b>	<b>4%</b>
	Nova Scotia	<b>4</b>	<b>7%</b>
<b>Marihuana Grow Operations and related Violence</b>			
<b>Illegal Marihuana Grow Operations</b>	Weapons/instruments	<b>113</b>	<b>36%</b>
	Injury	<b>77</b>	<b>25%</b>
	Fatalities	<b>5</b>	<b>2%</b>
<b>Legal Marihuana Grow Operations</b>	Weapons/instruments	<b>26</b>	<b>47%</b>
	Injury	<b>12</b>	<b>22%</b>
	Fatalities	<b>0</b>	<b>0</b>
	Marihuana theft	<b>22</b>	<b>40%</b>
<b>Organized Crime Involvement</b>		<b>16</b>	<b>5%</b>
<b>Offence Type and Charges</b>			
		<b>220</b>	<b>71%</b>
<b>Suspects</b>	Identified	<b>42</b>	<b>19%</b>
	Charged	<b>11</b>	<b>5%</b>
<b>Victims/complainants</b>	Identified	<b>175</b>	<b>80%</b>
	Charged with cultivation offences	<b>52</b>	<b>30%</b>
<b>Errors in targeting MGO locations (wrong address, or no longer active MGO)</b>		<b>33</b>	<b>10%</b>
<b>Repeated target location for grow rips</b>		<b>12</b>	<b>4%</b>
<b>Impersonating law enforcement</b>		<b>11</b>	<b>4%</b>

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## Endnotes

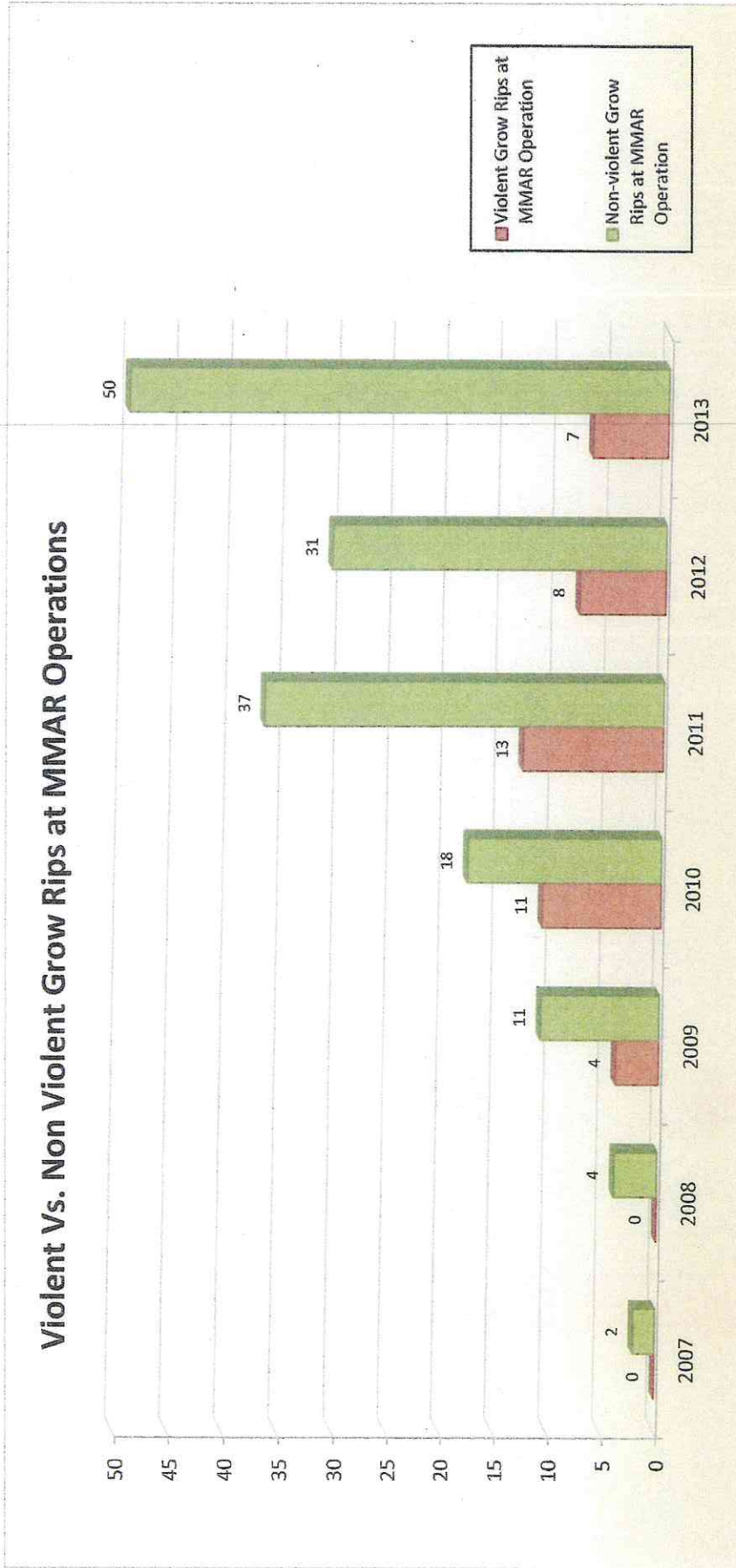
- <sup>i</sup> *An Analysis of National Cases Related to the Marihuana Medical Access Regulations*, prepared by the RCMP on behalf of the CACP. November 2010, Protected A.
- <sup>ii</sup> RCMP Criminal Intelligence, *Drug Situation Report - 2009*, Unclassified.
- <sup>iii</sup> RCMP Criminal Intelligence, *Project SERRE II – Marihuana Cultivation in Canada: Evolution and Current Trends*. 2002, Protected A.
- <sup>iv</sup> RCMP, *Policy on Officer Safety – Bio-Hazards and Marihuana Cultivation*. Unclassified
- <sup>v</sup> RCMP Criminal Intelligence, *Project SERRE II – Marihuana Cultivation in Canada: Evolution and Current Trends*. 2002, Protected A.

# Annex VV



# Grow Rips in British Columbia

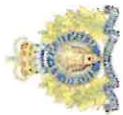
Fig. 1. Violent<sup>1</sup> vs. Non-violent MMAR Grow rips



Between 2007 and 2013, 196 grow rips from MMAR operations were identified in BC. Figure 1 illustrates the number of violent grow rips and the number of non-violent grow rips that took place in that time period. Grow rip tactics include impersonating police and wearing their corresponding uniforms. Victims are tied using zap straps and threatened or injured with weapons including but not limited to firearms, knives, bear sprav, and pipes.

<sup>1</sup> Violence is defined as the presence of weapons, physical harm, intimidation, and/or threats inflicted upon a person.

Grow rip data for 2007 to 2010 was obtained from an RCMP "E" Divisions "Grow rips in BC 2007-2010" chart prepared by an RCMP "E" Division Analyst.



# Grow Rips in British Columbia

Fig. 3. Grow Rips Comparison by Agencies

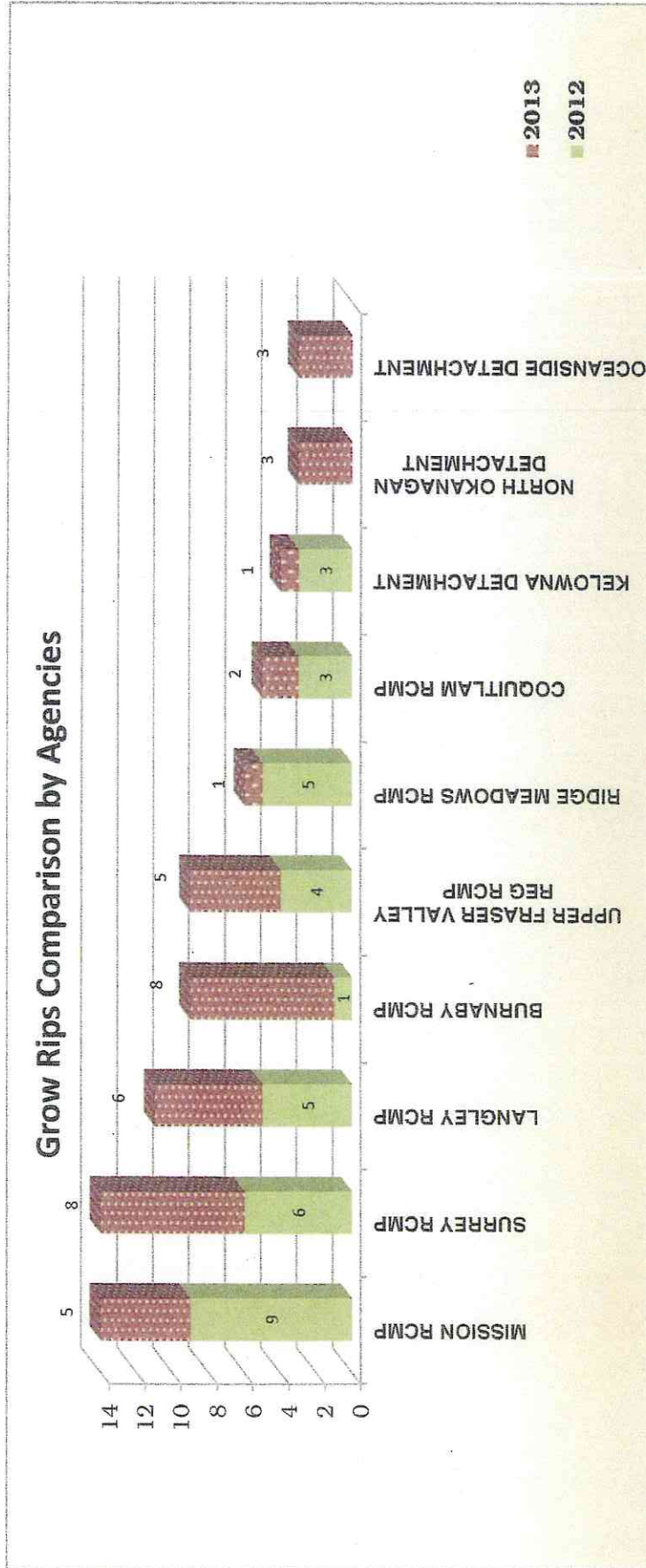
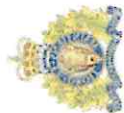


Figure 3 illustrates police agencies in BC that have a concentration of 3 or more grow rips between 2012 and 2013. The Island District and North Okanagan region reveal emerging grown rip activity and may also indicate a higher presence of grow operations. The incidents targeted in these regions were all medical marihuana grow operations and no violent activity was noted. It is evident the majority of grow rips occur in the LMD as well as a significant increase of grow rip activity in Burnaby has been noted. In 2013, 38% of Burnaby grow rips involved violence and in one instance, the wrong house was targeted.



# Grow Rips in British Columbia

Fig. 2. MMAR Grow Rips vs. Illegal Grow Rips



Figure 2 illustrates a proportionate activity rate (50%) of grow rip activity occurring at illegal and MMAR between 2007 and 2013. From 2011 to 2013, grow rip activity at MMAR locations have increased, while 31% of grow rips were reported to take place at illegal operations. As medical marihuana becomes licensed for production, illegal grow operations continue to represent a noteworthy presence in BC. It is important to note that the displayed figures on grow rips in BC do not fully explain the scope of the situation as there is a degree of activity and that is not reported.



# **Annex WW**



Top photograph: Marijuana placed in a plastic tube. The black cap has multiple holes with a paper filter inserted. The cap is then screwed on. Bottom photograph: Butane applied to the end of the tube of marijuana which travels through the marijuana, stripping the THC and depositing it in the white bowl.



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**EXTREMELY HAZARDOUS PROCESS BECAUSE BUTANE IS HIGHLY FLAMMABLE.**

Top photograph: Butane exiting from the tube of marijuana and into a bowl. Flammable fumes are being created during this process. Bottom photograph: Collection of oil and butane mixture before the butane is evaporated off.



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Top photograph: Butane begins to evaporate away.

Bottom photograph: BHO residue left behind after the butane is evaporated.

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*The remaining material is a form of BHO that can be smoked or added to other derivatives. In this test, the residue appeared to resemble human ear wax.*

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# **Annex XX**



*Above three photographs depict a controlled explosion of six (6) cans of butane at the San Diego Regional Fire Training Academy.*

# Annex YY





Photograph on the left: A glass tube filled with marihuana and fitted with a paper filter to manufacture BHO.

Photograph on the right: A large metal tube fitted with a paper filter to manufacture BHO.



*The MMAR producer was manufacturing BHO using the butane canisters (inset photograph). The BHO was being deposited into the glass tray. The electric powered fan could potentially ignite the highly flammable butane gas.*

# Annex ZZ



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On February 24, 2014 the Surrey Fire department, along with paramedics and Surrey RCMP attended a residential explosion. The occupants were manufacturing BHO which resulted in an explosion and subsequent fire. This was NOT an MMAR site but illustrates the damage caused from extracting THC with butane.

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*Photographs of the hundreds of expelled butane canisters used to make BHO.*

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# Annex AAA



On March 10, 2014 Police, Fire, and Ambulance personnel responded to a residential explosion at a MMAR production site. Exterior damage was visible upon arrival.



Photograph from inside the MIMAR production site with the resulting damage to the ceiling from the explosion.

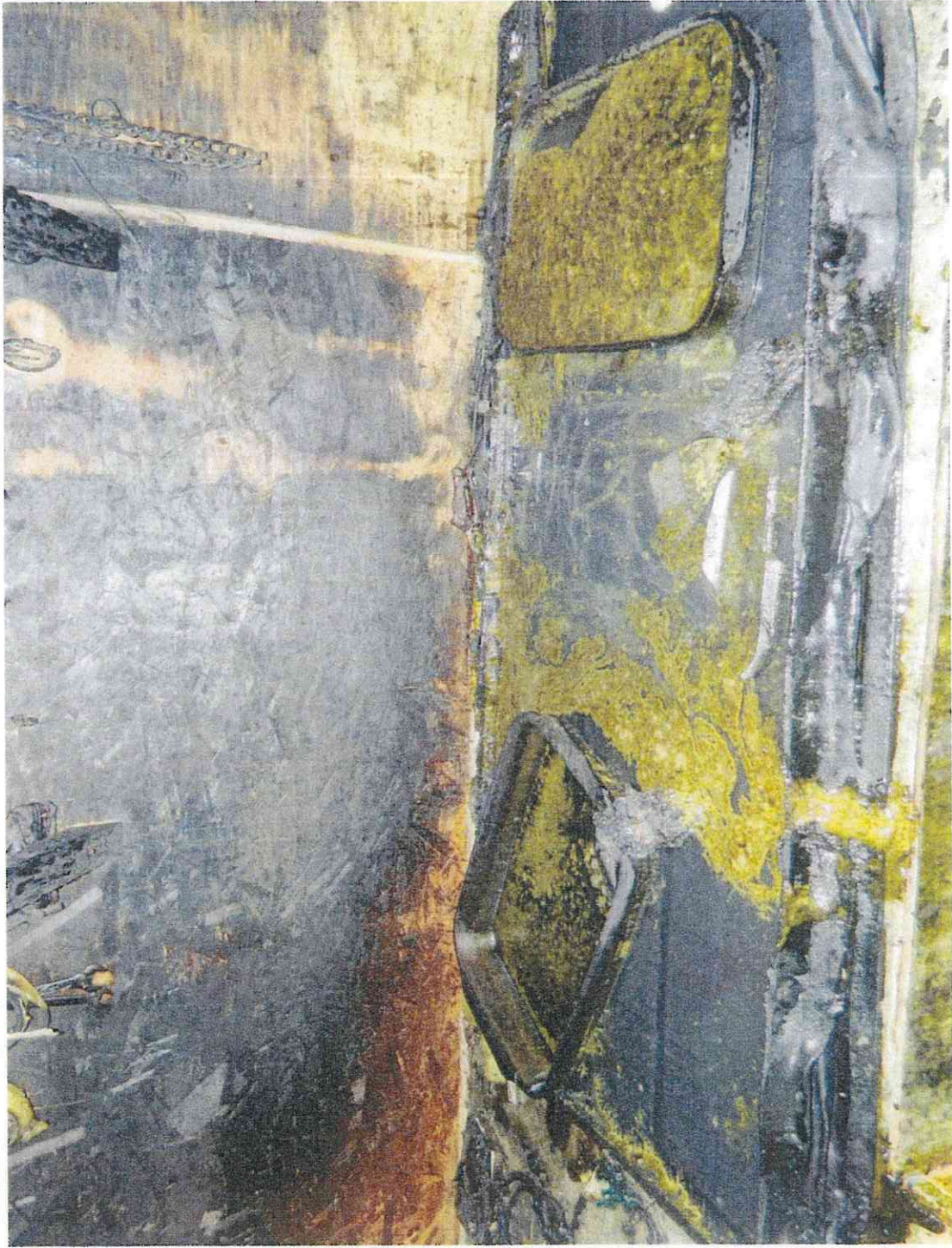




*One of the BHO extraction tubes saturated in marijuana resin was located inside the MMAR production site.*



*Two large BHO tubes packed with marihuana were located inside the MMAR production site and where the BHO was being manufactured. The tubes appear to have rubber grips added because the butane causes the tube to get very cold.*



Two large glass baking containers with BHO were located in the MMAR production site. The resulting explosion and fire caused extensive burns to 2 out of the 3 people on site.



Hundreds of expelled butane canisters to make BHO were located at the MMAR production site.