

This is the 1st affidavit of Ellana Chua in this case and was made on February 22, 2024.

No. S-237897
Vancouver Registry



IN THE SUPREME COURT OF BRITISH COLUMBIA

**IN THE MATTER OF THE COMPANIES' CREDITORS ARRANGEMENT ACT, R.S.C. 1985
c. C-36, AS AMENDED**

-AND-

**IN THE MATTER OF A PLAN OF COMPROMISE AND ARRANGEMENT OF TEBO MILL
INSTALLATIONS INC., TEBO MILL CONSTRUCTION INC., ALGON HOLDINGS INC.,
FRASERVIEW FABRICATION AND MACHINING INC., and PTOLEMYTECH
CONSULTANTS INC.**

PETITIONERS

AFFIDAVIT

I, Ellana Chua, Legal Assistant at Bennett Jones LLP, of 2500 – 666 Burrard Street, Vancouver, British Columbia, AFFIRM THAT:

1. I am a legal assistant at Bennett Jones LLP, counsel for the Petitioners, TEBO Mill Installations Inc., TEBO Mill Construction Inc., Algon Holdings Inc., Fraserview Fabrication and Machining Inc., and Ptolemytech Consultants Inc., and as such have personal knowledge of the facts and matters hereinafter deposed to, except where stated to be based on information and belief, and whereso stated, I verily believe them to be true.
2. Attached and marked as **Exhibit "A"** is an email correspondence from Jordan Schultz, counsel for Royal Bank of Canada, to David Gruber, counsel for the Petitioners, dated January 10, 2024.
3. Attached and marked as **Exhibit "B"** is an email correspondence from Mr. Gruber to Mr. Schultz, along with enclosure, dated January 22, 2024.
4. Attached and marked as **Exhibit "C"** is an email correspondence from Mr. Schultz to Mr. Gruber dated January 23, 2024.

5. Attached and marked as **Exhibit “D”** is an email correspondence from Mr. Gruber to Mr. Schultz dated January 23, 2024.

6. Attached and marked as **Exhibit “E”** is an email correspondence from Mr. Gruber to Mr. Schultz dated February 14, 2024.

7. Attached and marked as **Exhibit “F”** is an email correspondence from Mr. Schultz to Mr. Gruber dated February 16, 2024.

8. Attached and marked as **Exhibit “G”** is an email correspondence from Mr. Gruber to Mr. Schultz dated February 16, 2024.

9. Attached and marked as **Exhibit “H”** is an email correspondence from Mr. Gruber to Mr. Schultz, along with enclosure, dated February 17, 2024.

10. Attached and marked as **Exhibit “I”** is an email correspondence from Mr. Schultz to Mr. Gruber dated February 20, 2024.

11. Attached and marked as **Exhibit “J”** is an email correspondence from Mr. Gruber to Mr. Schultz dated February 20, 2024.

12. Attached and marked as **Exhibit “K”** is an email correspondence from Mr. Schultz to Mr. Gruber dated February 20, 2024.

13. Attached and marked as **Exhibit “L”** is an email correspondence from Mr. Gruber to Mr. Schultz dated February 20, 2024.

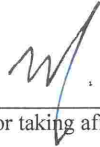
14. Attached and marked as **Exhibit “M”** is an email correspondence from Mr. Schultz to Mr. Gruber, along with enclosure, dated February 22, 2024.

15. Attached and marked as **Exhibit “N”** is an email correspondence from Mr. Gruber to Mr. Schultz dated February 22, 2024.

16. Attached and marked as **Exhibit “O”** is an email correspondence from Mia Laity to Mr. Schultz dated February 22, 2024.

17. Attached and marked as **Exhibit "P"** is an email correspondence from Ms. Laity to Mr. Schultz dated February 22, 2024.

AFFIRMED BEFORE ME at Vancouver,)
British Columbia, on February 22, 2024.)



A Commissioner for taking affidavits for British Columbia)



ELLANA CHUA)

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

This is **Exhibit "A"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Cc: [Lee, Huey](#)
Subject: RBC / Tebo
Date: Wednesday, January 10, 2024 11:53:34 AM
Attachments: [image001.png](#)

Hi David,

Happy new year, hope you had a good break.

Wanted to touch base on Tebo. The Bank has been in regular contact with Mr. Khara over the past few weeks regarding the refinancing he has been working on for the last several months. On the one hand, it sounds like Mr. Khara is close to completing this. Mr. Khara has stated, "The funds are ready to be transferred at this point". However, delays are ongoing. It sounds like the delay now is just mechanics of transferring funds, but the source of funds / steps he needs to take to have funds transferred to RBC have been unclear and difficult to verify.

Per Michael's request below, are you able to have your client provide any documentation to support the amount of funds available, and the anticipated timing to complete the transfer? I didn't really understand the various account numbers and names listed below, but ultimately all we need to see is confirmation funds are in an account controlled by TEBO / Mr. Khara, and to try to get a better understanding of the steps he is taking to transfer these over to RBC.

Also, Mr. Khara has also stated he will have a, "Due Diligence package for RBC to review". Can you advise when this will be delivered?

Thanks,

Jordan

Thanks,

Jordan

Jordan Schultz

Partner

My **pronouns** are: He/Him/His

 +1 604 691 6452 |  +1 778 238 8339

jordan.schultz@dentons.com | [Bio](#) | [Website](#)

Dentons Canada LLP | 20th Floor, 250 Howe Street, Vancouver, BC, V6C 3R8, Canada



[Our Legacy Firms](#) | [Client Experience \(CX\)](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer



Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 3, 2024 9:46 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Tuesday, January 2, 2024 10:16 PM
To: Wells, Michael <michael.wells@rbc.com>
Subject: More on MT103 Transfer



Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

This is **Exhibit "B"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025.

From: [David Gruber](#)
To: [Jordan Schultz LL.B., B.Sc. \(Hons.\)](#)
Cc: [Mia Lajty](#)
Subject: TEBO Group
Date: Monday, January 22, 2024 2:24:42 PM
Attachments: [image001.png](#)
[image002.png](#)
[Alan's Letter Haywood 1.19.24.pdf](#)

Hi Jordan,

Further to our most recent conversation, I'm copying for your reference the information my client provided RBC in the email exchange below and attaching a letter my client received from its counterparty. I'm told that the funds may hit RBC's account as early as Wednesday but in any event they should hit the account by the end of this week.

Best,

David Gruber

Partner and Department Co-Head, Litigation, Bennett Jones LLP
2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8

T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

BennettJones.com



----- Forwarded message -----

From: alan.khara@tebo-group.com
Subject: Re: RE: More on MT103 Transfer
Date: Jan 10, 2024 at 6:59 AM
To: Wells, Michael <michael.wells@rbc.com>

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries

 tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** |
24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 |
michael.wells@rbc.com

HAYWOOD & ASSOCIATES INTERNATIONAL INVESTMENTS, LLC

320 West Ohio Street, Suite 350

Office Number 356

Chicago, IL 60654

Tel: 773-724-1862

EM: investworldwide@gmail.comAlan.khara@tebo-group.com

January 19, 2024

Alankar Sukhdev Singh Khara
TEBO Mill Construction Inc.
8056 Alexander Rd.
Delta, British Columbia V4G1G7
Canada

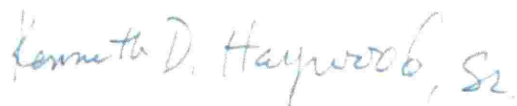
Re: 300 Million USD Funds Allocation for Investment

Dear Alan:

This Letter is to notify you, that Haywood & Associates International Investments LLC in association with our Bank, Merrill Lynch, wealth management division of the Bank of America and subject to the completion of compliance anticipates before the end of next week (January 26th, 2024) to have clearance to move forward with Manual Transfer of Funds Via MT103.

Given the size of your transaction (300 Million USD) compliance must be done based upon the standards of the U.S. Treasury and the Banking System. Upon such clearance of the compliance phase, we will move forward with the downloading of funds as per the manual transfer of MT103 instructions. Funds will be disbursed as per your instructions within 24 hours of the completion of the transfer. We look forward to a successful completion of this opportunity.

Sincerely,



Mr. Kenneth Haywood Sr., CEO

Cc: To all Parties involved

This is **Exhibit "C"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Cc: [Mia Laity](#)
Subject: RE: TEBO Group
Date: Tuesday, January 23, 2024 11:13:13 AM
Attachments: [image001.png](#)
[image002.png](#)

Thanks David,

I did see the below email from Alan to the Bank, though I note that was almost two weeks ago and the letter you sent over is not of much assistance in verifying funds or timing. The Bank had asked for documents to support where funds were and what the timing was going to be to wire to RBC, which I don't think we've seen yet.

I have instructions to re-set our receivership application (and I assume your CCAA cross-application). I am away for a couple of weeks in February, so if your client can finally complete the transfer that would be great but otherwise I think we need to bring this to a head. Does the week of Feb 20 work for you?

Thanks,
Jordan

Jordan Schultz
Partner

My [pronouns](#) are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Monday, January 22, 2024 2:25 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Cc: Mia Laity <LaityM@bennettjones.com>
Subject: TEBO Group

[WARNING: EXTERNAL SENDER]

Hi Jordan,

Further to our most recent conversation, I'm copying for your reference the information my client provided RBC in the email exchange below and attaching a letter my client received from its counterparty. I'm told that the funds may hit RBC's account as early as Wednesday but in any event they should hit the account by the end of this week.

Best,

David Gruber

Partner and Department Co-Head, Litigation, Bennett Jones LLP
2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8

T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

BennettJones.com



----- Forwarded message -----

From: alan.khara@tebo-group.com
Subject: Re: RE: More on MT103 Transfer
Date: Jan 10, 2024 at 6:59 AM
To: Wells, Michael <michael.wells@rbc.com>

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.
Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "D"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Schultz, Jordan](#)
Cc: [Mia Laity](#)
Subject: RE: TEBO Group
Date: Tuesday, January 23, 2024 11:18:59 AM
Attachments: [image005.png](#)
[image008.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Jordan,
I could do February 21 or 23.

Best,
David Gruber, *Partner and Department Co-Head, Litigation*, Bennett Jones LLP
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Tuesday, January 23, 2024 11:13 AM
To: David Gruber <GruberD@bennettjones.com>
Cc: Mia Laity <LaityM@bennettjones.com>
Subject: RE: TEBO Group

Thanks David,
I did see the below email from Alan to the Bank, though I note that was almost two weeks ago and the letter you sent over is not of much assistance in verifying funds or timing. The Bank had asked for documents to support where funds were and what the timing was going to be to wire to RBC, which I don't think we've seen yet.
I have instructions to re-set our receivership application (and I assume your CCAA cross-application). I am away for a couple of weeks in February, so if your client can finally complete the transfer that would be great but otherwise I think we need to bring this to a head. Does the week of Feb 20 work for you?
Thanks,
Jordan

Jordan Schultz
Partner

My [pronouns](#) are: He/Him/His
[+1 604 691 6452](tel:+16046916452) | [+1 778 238 8339](tel:+17782388339)
 Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Monday, January 22, 2024 2:25 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Cc: Mia Laity <LaityM@bennettjones.com>
Subject: TEBO Group
[WARNING: EXTERNAL SENDER]

Hi Jordan,
Further to our most recent conversation, I'm copying for your reference the information my client provided RBC in the email exchange below and attaching a letter my client received from its counterparty. I'm told that the funds may hit RBC's account as early as Wednesday but in any event they should hit the account by the end of this week.

Best,
David Gruber
Partner and Department Co-Head, Litigation, Bennett Jones LLP
2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)
BennettJones.com



----- Forwarded message -----

From: alan.khara@tebo-group.com
Subject: Re: RE: More on MT103 Transfer
Date: Jan 10, 2024 at 6:59 AM
To: Wells, Michael <michael.wells@rbc.com>

Hello Michael,
Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this

MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "E"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Jordan Schultz LL.B., B.Sc. \(Hons.\)](#)
Bcc: [Mia Laity](#)
Subject: FW: RE: RE: RE: More on MT103 Transfer
Date: Wednesday, February 14, 2024 1:53:15 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Jordan,
 I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?
 Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, February 12, 2024 5:09 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: RE: More on MT103 Transfer

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
 Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
 Account Number: 07940 8728917
 Swift Code: ROYCCAT2
 Currency: Euros
 Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00

Second Tranche: 10,314,159.00

Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike

Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch, the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com
Phone Number: (888)372-5933 Ext 1591807
Please note, after completion, it will be forward to RBC account as a SWIFT MT103.
Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer



Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Tuesday, January 2, 2024 10:16 PM
To: Wells, Michael <michael.wells@rbc.com>
Subject: More on MT103 Transfer



Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

This is **Exhibit "F"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Subject: Re: RE: RE: RE: More on MT103 Transfer
Date: Friday, February 16, 2024 10:15:46 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi David,

As I understand it, the issue was raised (and answered) in November, and has to do with the question: " Swift MT103 STP. Please verify that this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,
 Jordan

Jordan Schultz
 Partner

My pronouns are: He/Him/His
[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339
 Dentons Canada LLP | Vancouver

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](https://www.dentons.com) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Date: Wed, Feb 14, 2024, 3:53 p.m.
To: "Schultz, Jordan" <jordan.schultz@dentons.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 5:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer
 Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
 Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
 Account Number: 07940 8728917
 Swift Code: ROYCCAT2
 Currency: Euros
 Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that

transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

- First Tranche: 4,997,955.00
- Second Tranche: 10,314,159.00
- Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
 Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?
 Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, January 15, 2024 7:37 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer



Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[\[External\]/\[External\]](#)

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
 Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

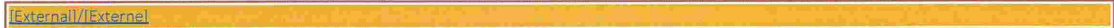
Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
 Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External/External](#)

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External/External](#)

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for

RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "G"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR

A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Jordan Schultz, LL.B., B.Sc. \(Hons.\)](#)
Subject: RE: RE: More on MT103 Transfer
Date: Friday, February 16, 2024 2:11:34 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.

Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>
Sent: Feb 16, 2024 10:15 a.m.
To: David Gruber <GruberD@bennettjones.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,

As I understand it, the issue was raised (and answered) in November, and has to do with the question: " Swift MT103 STP. Please verify that this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,
Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His
D +1 604 691 6452 | M +1 778 238 8339
Dentons Canada LLP | Vancouver

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see dentons.com for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Date: Wed, Feb 14, 2024, 3:53 p.m.
To: "Schultz, Jordan" <jordan.schultz@dentons.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 5:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer
Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
 Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
 Account Number: 07940 8728917
 Swift Code: ROYCCAT2
 Currency: Euros
 Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
 Second Tranche: 10,314,159.00
 Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[\[External/Externe\]](#)

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
 TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
 Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks
 Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 10, 2024 8:02 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch
 Account Number: 6550113516
 ABA Number: 026009593
 (International Banks Can use Swift-BIC: BOFAUS3N)
 Bank of America, N.A.
 100 West 33rd Street
 New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC
 Account Number: 8XM-69A66
 Bank Officer: Mr. Shawn Rodgers
 Bank Email: Shawn_Rodgers@ml.com
 Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
 TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by

reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

External/External

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that "funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

External/External

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow

them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "H"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Jordan Schultz, LL.B., B.Sc. \(Hons.\)](#)
Bcc: [Mia Laity](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Saturday, February 17, 2024 3:28:53 PM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image001.png](#)
[image002.png](#)
[Partial_XMT_STATEMENT_DB_DALQCORP_PTE_LTD_DEUT20BDALOC_53736_2783_73_18.pdf](#)

Jordan,

Further to the previous request, attached is the banking information provided by TEBO's counterparty. I'm further advised that Mr. Khara has spoken with an asset management consultant in Toronto who advised him that the private wealth group within RBC should be more familiar with the particular SWIFT coding at issue.

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. 604 891 5150 | F. 604 891 5100

From: David Gruber <GruberD@bennettjones.com>
Sent: Friday, February 16, 2024 2:12 PM
To: Jordan Schultz, LL.B., B.Sc. (Hons.) <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.

Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>
Sent: Feb 16, 2024 10:15 a.m.
To: David Gruber <GruberD@bennettjones.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,

As I understand it, the issue was raised (and answered) in November, and has to do with the question: "Swift MT103 STP. Please verify that this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,

Jordan

Jordan Schultz
 Partner

My pronouns are: He/Him/His
[D +1 604 691 6452](tel:+16046916452) | [M +1 778 238 8339](tel:+17782388339)
 Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see dentons.com for Legal Notices

From: David Gruber <GruberD@bennettjones.com>
Date: Wed, Feb 14, 2024, 3:53 p.m.
To: "Schultz, Jordan" <jordan.schultz@dentons.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. 604 891 5150 | F. 604 891 5100

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 5:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer
Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
Account Name: TEBO Mill Construction Inc.
Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
Account Number: 07940 8728917
Swift Code: ROYCCAT2
Currency: Euros
Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
Second Tranche: 10,314,159.00
Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?
Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, January 15, 2024 7:37 AM
To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn.Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807
Please note, after completion, it will be forward to RBC account as a SWIFT MT103.
Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).
Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael,
We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.
We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.
The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that "funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External/Extrenal](#)

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

C. SYSTEM REPORT / FULL ACCOUNT INFORMATION LIST


>>>CONFIRMING SOURCE PACKAGES FILE ACKNOWLEDGEMENT AFT CONFIRMING
>>>CONFIRMING SOURCE FILE DEUTSCHE BANK AG

CONNECTED : DEUTSCHE BANK AG (193.150.166.0/24) (193.150.166.0/243)
PRIME SOURCE PACKAGE : FARM 41/42/107
>>>433://EXTRACTING PARTICIPANTS..... COMPLETE
>>>001://RELEASING SOURCE NAMES..... AFT CONFIRMED
www.db.com//SRV1/1P0V4..... CONNECTED
//1://DOWNLOADING..... 100%

***DALOCORP PTE LTD
***TRANSACTION CODE..... 090512DEUTDEFEXX886479
***FUNDS PROVIDER..... DALOCORP PTE LTD
***TRANSACTION REFERENCE NUMBER..... USCSY-00581:08F100T:EUR/GG2A314
***DTCC/DTCC INTERBANK BLOCKING CODES..... 144A-S:G4639DYY8
//1://INTERBANK BLOCKING CODE..... 144A-S:G4639DYY8
//2://IDENTITY CODE..... 2YC DB FR DE 17BEH
***ACCOUNT IBAN..... D51660700240097750400
947259564
***COMMON ACCOUNT NUMBER..... 0354
***DTC ACCOUNT..... 00000000SRT-RN-38837862BEHLRLN000000
18.859.290.336.55
***CLIENT NO..... EURO (€)
***TOTAL AVAILABLE AMOUNT..... AS8373
***CURRENCY..... 193.150.166.0/24 ; 193.150.166.0/243
***SERVER ID (ORIGIN)..... 5020005635
***SERVER IP..... 214284
***WTS (WINDOWS TERMINAL SERVER)..... 486NA
***UID..... FGMA70
***IMAD..... FGMA70
***CLIENT CODE..... 02267
***PIN CODE..... SCF-664N388RT667
***PERMIT ARRIVAL NUMBER..... US44328MAF14
***REFERENCE NUMBER..... A23F17.01.31.47.GTFS
***SORT CODE..... 0097750400
***ACCOUNT NUMBER..... 193.150.166.0/24
***CREDIT INSTITUTION..... DEUTSCHE BANK AG
***BANK ADDRESS..... TAUENUSANLAGE 12, 60325 FRANKFURT AM MAIN, GERMANY
***SWIFT CODE (BIC)..... DEUTDEFXXX
***COMPANY NAME..... DALOCORP PTE LTD
***REGISTRATION NUMBER..... 201618410E
***CLEARING HOUSE NUMBER..... DEUT-HEBA17690672
***BLOCKING CODE..... 144A-S:G4639DYY8
***FINAL BLOCKING CODE..... CR38828530
***ACCESS CODE..... HSB1268400
***RELEASE CODE..... 649 E 45395 / 598.053225
FINAL CODE..... **
***BANK OFFICER NAME..... MR JAMES VON NOLTKE (54082)

END OF ACCOUNT INFORMATION

This is **Exhibit "I"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Tuesday, February 20, 2024 1:59:08 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Thanks for this David,
 I will speak with the Bank this afternoon and be back to you shortly. But I'm a bit confused, is it just a currency issue or is your client asking about transfer by MT103? If it's the latter, my understanding is MT103 is referring to a manual transfer.
 In any event I'm advised RBC double checked with its payment group again and confirmed they could not accept this type of transfer. Can you tell me who at RBC your client spoke to, though? If your client is getting conflicting information from RBC it would help to know who is providing that so we can cross reference.
 Thanks,
 Jordan

Jordan Schultz
 Partner

My [pronouns](#) are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Saturday, February 17, 2024 3:29 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer
[WARNING: EXTERNAL SENDER]

Jordan,
 Further to the previous request, attached is the banking information provided by TEBO's counterparty.
 I'm further advised that Mr. Khara has spoken with an asset management consultant in Toronto who advised him that the private wealth group within RBC should be more familiar with the particular SWIFT coding at issue.
 Best,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: David Gruber <GruberD@bennettjones.com>
Sent: Friday, February 16, 2024 2:12 PM
To: Jordan Schultz, LL.B., B.Sc. (Hons.) <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.
 Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>
Sent: Feb 16, 2024 10:15 a.m.
To: David Gruber <GruberD@bennettjones.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,
 As I understand it, the issue was raised (and answered) in November, and has to do with the question: "Swift MT103 STP. Please verify that this provision is available". I gather it is not.
 I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.
 At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.
 I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?
 Thanks,
 Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His

[+1 604 691 6452](tel:+16046916452) | [+1 778 238 8339](tel:+17782388339)

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Date: Wed, Feb 14, 2024, 3:53 p.m.
To: "Schultz, Jordan" <jordan.schultz@dentons.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,
I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 5:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer
Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
Account Name: TEBO Mill Construction Inc.
Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
Account Number: 07940 8728917
Swift Code: ROYCCAT2
Currency: Euros
Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
Second Tranche: 10,314,159.00
Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External/Externe](#)

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch, the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

External/External

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

External/External

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks. The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 3, 2024 9:46 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer



Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

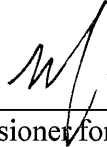
If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "J"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Schultz, Jordan](#)
Bcc: [Mia Lalay](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Tuesday, February 20, 2024 5:46:18 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image001.png](#)
[image002.png](#)

Hi Jordan,
 I don't think it is a currency issue. I think it's whether the MT103 form can be issued in respect of the electronic SWIFT transfer.
 See: https://www2.swift.com/knowledgecentre/publications/us1m_20200724/?topic=mt103.htm
 I will ask my client if he has names of the RBC staff he spoke with.

Best,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Tuesday, February 20, 2024 1:59 PM
To: David Gruber <GruberD@bennettjones.com>
Subject: RE: RE: RE: More on MT103 Transfer

Thanks for this David,
 I will speak with the Bank this afternoon and be back to you shortly. But I'm a bit confused, is it just a currency issue or is your client asking about transfer by MT103? If it's the latter, my understanding is MT103 is referring to a manual transfer.
 In any event I'm advised RBC double checked with its payment group again and confirmed they could not accept this type of transfer. Can you tell me who at RBC your client spoke to, though? If your client is getting conflicting information from RBC it would help to know who is providing that so we can cross reference.

Thanks,
 Jordan

Jordan Schultz
 Partner

My [pronouns](#) are: He/Him/His
[+1 604 691 6452](tel:+16046916452) | [+1 778 238 8339](tel:+17782388339)
 Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Saturday, February 17, 2024 3:29 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer
[WARNING: EXTERNAL SENDER]

Jordan,
 Further to the previous request, attached is the banking information provided by TEBO's counterparty.
 I'm further advised that Mr. Khara has spoken with an asset management consultant in Toronto who advised him that the private wealth group within RBC should be more familiar with the particular SWIFT coding at issue.

Best,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: David Gruber <GruberD@bennettjones.com>
Sent: Friday, February 16, 2024 2:12 PM
To: Jordan Schultz, LL.B., [B.Sc. \(Hons.\)](#) <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.
 Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>
Sent: Feb 16, 2024 10:15 a.m.
To: David Gruber <GruberD@bennettjones.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,
 As I understand it, the issue was raised (and answered) in November, and has to do with the question: " Swift MT103 STP. Please verify that

this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,
Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His

[D](tel:+16046916452) +1 604 691 6452 | [M](tel:+17782388339) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>

Date: Wed, Feb 14, 2024, 3:53 p.m.

To: "Schultz, Jordan" <jordan.schultz@dentons.com>

Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP

T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, February 12, 2024 5:09 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: RE: More on MT103 Transfer

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)

Bank Address: 1055 W Georgia St, 6th floor, Vancouver, BC, V6E3S5

Account Name: TEBO Mill Construction Inc.

Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2

Currency: Euros

Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00

Second Tranche: 10,314,159.00

Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?
Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, January 15, 2024 7:37 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer

[\[External\]/\[External\]](#)

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External/Externe]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Tuesday, January 2, 2024 10:16 PM
To: Wells, Michael <michael.wells@rbc.com>
Subject: More on MT103 Transfer



Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

Message Reference Guide

You are viewing an obsolete version of this publication. [View latest version](#)

Published on 24 July 2020
Interests Standards

[Download as PDF](#)



Search within this document



Table of contents

[Expand all](#) [Collapse all](#)

[Hide](#)

- Title page
- Introduction
- Category 1 Message Types

Euro - Impact on Category Message Standards

- ▶ [MT 101 Request for Transfer](#)
- ▶ [MT 102 Multiple Customer Credit Transfer](#)
- ▶ [MT 102 STP Multiple Customer Credit Transfer](#)
- ▶ [MT 103 Single Customer Credit Transfer](#)

- ▶ [MT 103 Scope](#)
- ▶ [MT 103 Format Specifications](#)
- ▶ [MT 103 Network Validated Rules](#)
- ▶ [MT 103 Usage Rules](#)
- ▶ [MT 103 Market Practice Rules](#)
- ▶ [MT 103 Guidelines](#)
- ▶ [MT 103 Field Specifications](#)
- ▶ [MT 103 Examples](#)
- ▶ [MT 103 REMIT Single Customer Credit Transfer](#)
- ▶ [MT 103 STP Single Customer Credit Transfer](#)

- ▶ [MT 104 Direct Debit and Request for Debit Transfer Message](#)
- ▶ [Privacy statement](#) | [Terms of use](#) | [Contact Us](#)

MT 103 Single Customer Credit Transfer

The MT 103 is a General Use message, that is, no registration in a Message User Group (MUG) is necessary to send and receive this message. It allows the exchange of single customer credit transfers using all MT 103 fields. The MT 103 can be straight through processable if the message is properly formatted according to pre-agreed bilateral/multilateral rules.

Two variants of the MT 103 exist and these are documented separately.

1. The MT 103 STP is a general use message, that is, no registration in a MUG is necessary to send and receive this message. It allows for the exchange of single customer credit transfers using a network-validated, restricted set of fields and format options of the MT 103 to make it straight through processable.
2. The MT 103 REMIT requires registration in the Extended Remittance Information MUG. This MUG allows its subscribers to exchange MT 103 REMIT messages with an extended amount of remittance information in the additional field 771 Envelope Contents. This remittance information may optionally be exchanged in a non-SWIFT format, such as EDIFACT or ANSI.X12.

Important:

User header block (block 3) must be present and must contain field 121 Unique End-to-end Transaction Reference (UETR). In cases where the sender is acting as intermediary and a UETR was present in the received message, the UETR must be passed, unchanged, to the next message in the transaction chain. In all other cases a new UETR must be used. Details of the format of the user header block and field 121, and also the required order of fields in the user header block, can be found in the [FIN Operations Guide](#).

- » [MT 103 Scope](#)
- » [MT 103 Format Specifications](#)
- » [MT 103 Network Validated Rules](#)
- » [MT 103 Usage Rules](#)
- » [MT 103 Market Practice Rules](#)
- » [MT 103 Guidelines](#)
- » [MT 103 Field Specifications](#)
- » [MT 103 Examples](#)

This is **Exhibit "K"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Tuesday, February 20, 2024 5:57:51 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Thanks,

Is there a reason they can't just wire funds? This seems like a lot of hoops to jump through for a transfer between two fairly large banks that presumably send money back and forth on a regular basis.

Regards,
 Jordan

Jordan Schultz
 Partner

My [pronouns](#) are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>

Sent: Tuesday, February 20, 2024 5:46 PM

To: Schultz, Jordan <jordan.schultz@dentons.com>

Subject: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I don't think it is a currency issue. I think it's whether the MT103 form can be issued in respect of the electronic SWIFT transfer.

See: https://www2.swift.com/knowledgecentre/publications/usim_20200724/?topic=mt103.htm

I will ask my client if he has names of the RBC staff he spoke with.

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP

T. [604 891 5150](#) | F. [604 891 5100](#)

From: Schultz, Jordan <jordan.schultz@dentons.com>

Sent: Tuesday, February 20, 2024 1:59 PM

To: David Gruber <GruberD@bennettjones.com>

Subject: RE: RE: RE: More on MT103 Transfer

Thanks for this David,

I will speak with the Bank this afternoon and be back to you shortly. But I'm a bit confused, is it just a currency issue or is your client asking about transfer by MT103? If it's the latter, my understanding is MT103 is referring to a manual transfer.

In any event I'm advised RBC double checked with its payment group again and confirmed they could not accept this type of transfer. Can you tell me who at RBC your client spoke to, though? If your client is getting conflicting information from RBC it would help to know who is providing that so we can cross reference.

Thanks,

Jordan

Jordan Schultz
 Partner

My [pronouns](#) are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>

Sent: Saturday, February 17, 2024 3:29 PM

To: Schultz, Jordan <jordan.schultz@dentons.com>

Subject: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Jordan,

Further to the previous request, attached is the banking information provided by TEBO's counterparty.

I'm further advised that Mr. Khara has spoken with an asset management consultant in Toronto who advised him that the private wealth group within RBC should be more familiar with the particular SWIFT coding at issue.

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP

T. [604 891 5150](#) | F. [604 891 5100](#)

From: David Gruber <GruberD@bennettjones.com>
Sent: Friday, February 16, 2024 2:12 PM
To: Jordan Schultz, LL.B., B.Sc. (Hons.) <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.

Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>
Sent: Feb 16, 2024 10:15 a.m.
To: David Gruber <GruberD@bennettjones.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,

As I understand it, the issue was raised (and answered) in November, and has to do with the question: " Swift MT103 STP. Please verify that this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,
Jordan

Jordan Schultz
Partner

My [pronouns](#) are: He/Him/His

[D](tel:+16046916452) +1 604 691 6452 | [M](tel:+17782388339) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsights@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Date: Wed, Feb 14, 2024, 3:53 p.m.
To: "Schultz, Jordan" <jordan.schultz@dentons.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 5:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)

Bank Address: 1055 W Georgia St, 6th floor, Vancouver, BC, V6E3S5

Account Name: TEBO Mill Construction Inc.

Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
 Account Number: 07940 8728917
 Swift Code: ROYCCAT2
 Currency: Euros
 Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
 Second Tranche: 10,314,159.00
 Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External]/[External]

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch, the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries

tebo-group.com**TEBO Mill Installations Inc.****TEBO Mill Construction Inc.****Fraserview Fabrication and Machining Inc.**

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer



Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by

reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that "funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External]/[External]

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow

them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "L"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Schultz, Jordan](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Tuesday, February 20, 2024 6:19:47 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image001.png](#)
[image002.png](#)

As I understand it, this is a requirement of TEBO's counterparty. But Deutsche Bank says they wire money to RBC by this method all the time, so they don't understand what the confusion is at RBC's end.

Best,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. 604 891 5150 | F. 604 891 5100

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Tuesday, February 20, 2024 5:58 PM
To: David Gruber <GruberD@bennettjones.com>
Subject: RE: RE: RE: More on MT103 Transfer

Thanks,
Is there a reason they can't just wire funds? This seems like a lot of hoops to jump through for a transfer between two fairly large banks that presumably send money back and forth on a regular basis.
Regards,
Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His

[D](tel:+16046916452) +1 604 691 6452 | [M](tel:+17782388339) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Tuesday, February 20, 2024 5:46 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Subject: RE: RE: RE: More on MT103 Transfer
[WARNING: EXTERNAL SENDER]

Hi Jordan,
I don't think it is a currency issue. I think it's whether the MT103 form can be issued in respect of the electronic SWIFT transfer.
See: https://www2.swift.com/knowledgecentre/publications/us1m_20200724/?topic=mt103.htm

I will ask my client if he has names of the RBC staff he spoke with.

Best,
David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. 604 891 5150 | F. 604 891 5100

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Tuesday, February 20, 2024 1:59 PM
To: David Gruber <GruberD@bennettjones.com>
Subject: RE: RE: RE: More on MT103 Transfer

Thanks for this David,
I will speak with the Bank this afternoon and be back to you shortly. But I'm a bit confused, is it just a currency issue or is your client asking about transfer by MT103? If it's the latter, my understanding is MT103 is referring to a manual transfer.
In any event I'm advised RBC double checked with its payment group again and confirmed they could not accept this type of transfer. Can you tell me who at RBC your client spoke to, though? If your client is getting conflicting information from RBC it would help to know who is providing that so we can cross reference.

Thanks,
Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His

[D](tel:+16046916452) +1 604 691 6452 | [M](tel:+17782388339) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Saturday, February 17, 2024 3:29 PM
To: Schultz, Jordan <jordan.schultz@dentons.com>

Subject: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Jordan,

Further to the previous request, attached is the banking information provided by TEBO's counterparty.

I'm further advised that Mr. Khara has spoken with an asset management consultant in Toronto who advised him that the private wealth group within RBC should be more familiar with the particular SWIFT coding at issue.

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP

T. 604 891 5150 | F. 604 891 5100

From: David Gruber <GruberD@bennettjones.com>

Sent: Friday, February 16, 2024 2:12 PM

To: Jordan Schultz, LL.B., B.Sc. (Hons.) <jordan.schultz@dentons.com>

Subject: RE: RE: RE: More on MT103 Transfer

I understood the question asked in November was whether RBC could accept a manual transfer, and that was the one for which the answer was 'no'. This is a different question. I'm told there are Eur denominated funds at Deutsche Bank ready to go but my client is concerned if the funds are initiated they may get held up unless RBC is able to receive them. He has been told conflicting things by different people at RBC. He has asked the same question of BMO and they say they can receive funds this way. So we are just asking for clarification.

Sent with BlackBerry Work (www.blackberry.com)

From: "Schultz, Jordan" <jordan.schultz@dentons.com>

Sent: Feb 16, 2024 10:15 a.m.

To: David Gruber <GruberD@bennettjones.com>

Subject: Re: RE: RE: RE: More on MT103 Transfer

Hi David,

As I understand it, the issue was raised (and answered) in November, and has to do with the question: "Swift MT103 STP. Please verify that this provision is available". I gather it is not.

I had understood the plan was to transfer funds to an intermediary bank so funds could be sent by "normal" wire. That was supposed to happen last December.

At this point, suffice to say we have no confidence funds actually exist, but the bank has provided wire details and Tebo can of course initiate the wire if it has the funds.

I'm back in the office next week so we can chat further then, but I'll confess I don't understand why this is so complicated. I've asked for this a few times but can he provide any evidence he actually has the funds (setting aside whatever issues may exist with transferring these funds to Canada)?

Thanks,

Jordan

Jordan Schultz

Partner

My pronouns are: He/Him/His

[D](tel:+16046916452) +1 604 691 6452 | [M](tel:+17782388339) +1 778 238 8339

Dentons Canada LLP | [Vancouver](https://www.dentons.com)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com Please see [dentons.com](https://www.dentons.com) for Legal Notices

From: David Gruber <GruberD@bennettjones.com>

Date: Wed, Feb 14, 2024, 3:53 p.m.

To: "Schultz, Jordan" <jordan.schultz@dentons.com>

Subject: FW: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Hi Jordan,

I left you a voicemail. My instructions are that funds are available to wire to RBC but that in response to the email below, Mr. Wells advised Mr. Khara that RBC could not receive funds in this manner. However, Mr. Khara was subsequently advised by RBC's wire department that they could. Can you let us know what the issue is (or perhaps elevate this to the level where there is an internal resolution within the bank)?

Thanks,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP

T. 604 891 5150 | F. 604 891 5100

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, February 12, 2024 5:09 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: RE: More on MT103 Transfer

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5
 Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7
 Account Number: 07940 8728917
 Swift Code: ROYCCAT2
 Currency: Euros
 Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
 Second Tranche: 10,314,159.00
 Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

External/Externe

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first

completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
 TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[\[External\]/\[External\]](#)

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that "funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External]/[External]

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "M"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Schultz, Jordan](#)
To: [David Gruber](#)
Subject: FW: RE: RE: RE: More on MT103 Transfer
Date: Thursday, February 22, 2024 9:00:02 AM
Attachments: [image001.png](#)
[TMC FCA confirmation letter - RBC April 18 2023 letterhead.pdf](#)

Hi David,

Please see attached / below.

Thanks,
 Jordan

Jordan Schultz
 Partner

My **pronouns** are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](https://www.dentons.com) for Legal Notices.

From: Wells, Michael <michael.wells@rbc.com>
Sent: Monday, February 12, 2024 8:45 AM
To: Alan Khara <alan.khara@tebo-group.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Alan, as per the email attached from last month. Nothing has changed. I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.

The wiring instructions are:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2
 Banker: MICHAEL WELLS
 Banker Email: michael.wells@rbc.com



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 6:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

[External/Externe]

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2

Currency: Euros

Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00

Second Tranche: 10,314,159.00

Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike

Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

[External/Externe]

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch, the

division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike

Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 10, 2024 8:02 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch
Account Number: 6550113516
ABA Number: 026009593
(International Banks Can use Swift-BIC: BOFAUS3N)
Bank of America, N.A.
100 West 33rd Street
New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers
Bank Email: Shawn_Rodgers@ml.com
Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks

Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



[External]/[Externe]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.

Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24 Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 3, 2024 9:46 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer



Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that "funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Tuesday, January 2, 2024 10:16 PM
To: Wells, Michael <michael.wells@rbc.com>
Subject: More on MT103 Transfer

[External]/[External]

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.



**RBC
Royal Bank**

87

18 April 2023

RBC Royal Bank
Special Loans Advisory Services
5th Floor, 335 8th Ave SW.
Calgary, Alberta T2P 1C9

Transit #07793
(403) 770-5821 Fax (403) 292-3019

To Whom it May Concern,

RE: Tebo Mill Construction Inc. – Foreign Currency Account (FCA)

This letter is to confirm that Tebo Mill Construction Inc has opened a Euro FCA with RBC Royal Bank.

The account transit is 07940 and the account number is 8728917.

Below are specific wiring instructions for deposits destined for this Euro FCA.

Beneficiary name: **TEBO MILL CONSTRUCTION INC.**
Account with beneficiary bank: **8728917**
RBC Royal Bank, Foreign Exchange Dept. Vancouver
1055 W Georgia St, 6th floor, Vancouver BC V6E 3S5
Transit # 07940
Swift: **ROYCATT2**
Sort Code: **//CC000307940**

Trusting this is all you require at this time.

Yours truly,

A handwritten signature in black ink, appearing to read 'Michael Wells'.

Michael Wells
Sr. Account Manager

michael.wells@rbc.com

This is **Exhibit "N"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR

A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [David Gruber](#)
To: [Schultz, Jordan](#)
Cc: [Mia Laib](#); [Jennine Punzalan](#)
Subject: RE: RE: RE: More on MT103 Transfer
Date: Thursday, February 22, 2024 9:56:29 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
Importance: High

Jordan,

My client has spoken with Deutsche Bank about sending a small amount to test RBC's ability to receive funds and was advised against doing this because it would attract uneconomic fees. Deutsche Bank's suggestion is that they send RBC a SWIFT MT199 message to validate RBC's ability to receive funds and if that message is sent and received successfully Deutsche Bank will send 5 million Euros by SWIFT MT103.

Please let us know if RBC is prepared to try this.

Alternatively, my client is advised by TD that it can accept transfers from Deutsche Bank by the proposed method but it will take 5 business days to set up a Euro denominated account and be in a position to receive funds. Is RBC prepared to allow a week for that to unfold?

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. 604 891 5150 | F. 604 891 5100

From: Schultz, Jordan <jordan.schultz@dentons.com>

Sent: Thursday, February 22, 2024 8:59 AM

To: David Gruber <GruberD@bennettjones.com>

Subject: FW: RE: RE: RE: More on MT103 Transfer

Hi David,

Please see attached / below.

Thanks,

Jordan

Jordan Schultz

Partner

My pronouns are: He/Him/His

[D](#) +1 604 691 6452 | [M](#) +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: Wells, Michael <michael.wells@rbc.com>

Sent: Monday, February 12, 2024 8:45 AM

To: Alan Khara <alan.khara@tebo-group.com>

Subject: RE: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Alan, as per the email attached from last month. Nothing has changed. I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.

The wiring instructions are:

Bank Name: Royal Bank of Canada (RBC)

Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.

Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2

Banker: MICHAEL WELLS

Banker Email: michael.wells@rbc.com



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, February 12, 2024 6:09 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: RE: More on MT103 Transfer

[External/External]

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)

Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.

Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917
Swift Code: ROYCCAT2
Currency: Euros
Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
Second Tranche: 10,314,159.00
Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.
Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?
Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, January 15, 2024 7:37 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer



Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries





TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External/Externals]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516

ABA Number: 026009593

(International Banks Can use Swift-BIC: BOFAUS3N)

Bank of America, N.A.

100 West 33rd Street

New York, NY 10001

Further,

Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC

Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers

Bank Email: Shawn_Rodgers@ml.com

Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,

Alan Khara, M.S., P.Eng.

Managing Director

TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



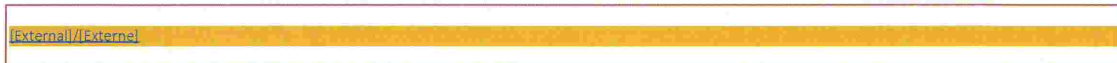
Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Sunday, January 7, 2024 12:00 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer



Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

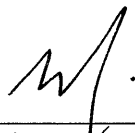
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

This is **Exhibit "O"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Mia Laity](#)
To: [Schultz, Jordan](#)
Cc: [Jennine Punzalan](#); [David Gruber](#)
Subject: RE: More on MT103 Transfer [BJ-WSLegal.FID6163039]
Date: Thursday, February 22, 2024 10:58:16 AM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)

Thank you, Jordan.

Our client is actioning the first suggestion. Toward that end, can you or someone at RBC advise what verbiage is required by RBC on MT199 Pre-advice?

Our client has been advised by DB that every receiving bank has their own acceptable verbiage for such swift communication, and that he is required to supply this from RBC to DB before they can send the communication.

Best,
Mia

Mia Laity (she/her)
Associate, Bennett Jones LLP
2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8
T. [604.891.5344](tel:6048915344) | F. [604.891.5100](tel:6048915100)
BennettJones.com



From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Thursday, February 22, 2024 10:38 AM
To: David Gruber <GruberD@bennettjones.com>
Cc: Mia Laity <LaityM@bennettjones.com>; Jennine Punzalan <punzalanj@bennettjones.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer

Thanks David,

RBC is prepared to try the first suggestion. Please have DB send the SWIFT MT199, and please send us a copy and whatever response is received once initiated.

I'd rather not go the TD route but we can explore if option 1 doesn't work.

Thanks,
Jordan

Jordan Schultz
Partner

My [pronouns](#) are: He/Him/His
[D | +1 604 691 6452](tel:+16046916452) | [M | +1 778 238 8339](tel:+17782388339)
Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Thursday, February 22, 2024 9:57 AM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Cc: Mia Laity <LaityM@bennettjones.com>; Jennine Punzalan <punzalanj@bennettjones.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer
Importance: High

[WARNING: EXTERNAL SENDER]

Jordan,

My client has spoken with Deutsche Bank about sending a small amount to test RBC's ability to receive funds and was advised against doing this because it would attract uneconomic fees. Deutsche Bank's suggestion is that they send RBC a SWIFT MT199 message to validate RBC's ability to receive funds and if that message is sent and received successfully Deutsche Bank will send 5 million Euros by SWIFT MT103. Please let us know if RBC is prepared to try this.

Alternatively, my client is advised by TD that it can accept transfers from Deutsche Bank by the proposed method but it will take 5 business days to set up a Euro denominated account and be in a position to receive funds. Is RBC prepared to allow a week for that to unfold?

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Thursday, February 22, 2024 8:59 AM
To: David Gruber <GruberD@bennettjones.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

Hi David,

Please see attached / below.

Thanks,
Jordan

Jordan Schultz
Partner

My **pronouns** are: He/Him/His
[D | +1 604 691 6452](tel:+16046916452) | [M | +1 778 238 8339](tel:+17782388339)

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited, please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinsightsca@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: Wells, Michael <michael.wells@rbc.com>
Sent: Monday, February 12, 2024 8:45 AM
To: Alan Khara <alan.khara@tebo-group.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Alan, as per the email attached from last month. Nothing has changed. I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.

The wiring instructions are:

Bank Name: Royal Bank of Canada (RBC)
Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2
Banker: MICHAEL WELLS
Banker Email: michael.wells@rbc.com



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 6:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer

[External/Externe]

Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2
Currency: Euros
Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
Second Tranche: 10,314,159.00
Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer

[External]/[External]

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch, the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
 Fax: 604-946-8573
 Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 10, 2024 8:02 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch

Account Number: 6550113516
ABA Number: 026009593
(International Banks Can use Swift-BIC: BOFAUS3N)
Bank of America, N.A.
100 West 33rd Street
New York, NY 10001

Further,
Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC
Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers
Bank Email: Shawn_Rodgers@ml.com
Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External]/[External]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 3, 2024 9:46 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer



Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated

that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Tuesday, January 2, 2024 10:16 PM
To: Wells, Michael <michael.wells@rbc.com>
Subject: More on MT103 Transfer



Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>

This is **Exhibit "P"** referred to in the Affidavit of Ellana Chua affirmed before me at the City of Vancouver, Province of British Columbia, this 22nd day of February, 2024



A Commissioner for taking Affidavits within
British Columbia

VANESSA MARIE COUPAR
A Commissioner for Taking
Affidavits for British Columbia
My Commission Expires June 30, 2025

From: [Mia Laity](#)
To: [Schultz, Jordan](#)
Cc: [Jennine Punzalan](#); [David Gruber](#)
Subject: RE: More on MT103 Transfer [BJ-WSLegal.FID6163039]
Date: Thursday, February 22, 2024 3:44:16 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image001.png](#)

Hello Jordan,

Following up on the below as it is nearing end of day. Have you received a response from RBC?

Best,
Mia

Mia Laity (she/her)
 Associate, Bennett Jones LLP
 2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8
 T. [604 891 5344](tel:6048915344) | F. [604 891 5100](tel:6048915100)
BennettJones.com



From: Mia Laity
Sent: Thursday, February 22, 2024 10:58 AM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Cc: Jennine Punzalan <punzalanj@bennettjones.com>; David Gruber <GruberD@bennettjones.com>
Subject: RE: More on MT103 Transfer [BJ-WSLegal.FID6163039]

Thank you, Jordan.

Our client is actioning the first suggestion. Toward that end, can you or someone at RBC advise what verbiage is required by RBC on MT199 Pre-advice?

Our client has been advised by DB that every receiving bank has their own acceptable verbiage for such swift communication, and that he is required to supply this from RBC to DB before they can send the communication.

Best,
Mia

Mia Laity (she/her)
 Associate, Bennett Jones LLP
 2500 Park Place, 666 Burrard Street, Vancouver, B.C., V6C 2X8
 T. [604 891 5344](tel:6048915344) | F. [604 891 5100](tel:6048915100)
BennettJones.com



From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Thursday, February 22, 2024 10:38 AM
To: David Gruber <GruberD@bennettjones.com>
Cc: Mia Laity <LaityM@bennettjones.com>; Jennine Punzalan <punzalanj@bennettjones.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer

Thanks David,



RBC is prepared to try the first suggestion. Please have DB send the SWIFT MT199, and please send us a copy and whatever response is received once initiated.

I'd rather not go the TD route but we can explore if option 1 doesn't work.

Thanks,
Jordan

Jordan Schultz
Partner

My pronouns are: He/Him/His

 +1 604 691 6452 |
  +1 778 238 8339

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinfo@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: David Gruber <GruberD@bennettjones.com>
Sent: Thursday, February 22, 2024 9:57 AM
To: Schultz, Jordan <jordan.schultz@dentons.com>
Cc: Mia Laity <LaityM@bennettjones.com>; Jennine Punzalan <punzalanj@bennettjones.com>
Subject: RE: RE: RE: More on MT103 Transfer
Importance: High

[WARNING: EXTERNAL SENDER]

Jordan,

My client has spoken with Deutsche Bank about sending a small amount to test RBC's ability to receive funds and was advised against doing this because it would attract uneconomic fees. Deutsche Bank's suggestion is that they send RBC a SWIFT MT199 message to validate RBC's ability to receive funds and if that message is sent and received successfully Deutsche Bank will send 5 million Euros by SWIFT MT103. Please let us know if RBC is prepared to try this.

Alternatively, my client is advised by TD that it can accept transfers from Deutsche Bank by the proposed method but it will take 5 business days to set up a Euro denominated account and be in a position to receive funds. Is RBC prepared to allow a week for that to unfold?

Best,

David Gruber, Partner and Department Co-Head, Litigation, Bennett Jones LLP
 T. [604 891 5150](tel:6048915150) | F. [604 891 5100](tel:6048915100)

From: Schultz, Jordan <jordan.schultz@dentons.com>
Sent: Thursday, February 22, 2024 8:59 AM
To: David Gruber <GruberD@bennettjones.com>
Subject: FW: RE: RE: RE: More on MT103 Transfer

Hi David,

Please see attached / below.

Thanks,
 Jordan

Jordan Schultz
 Partner

My pronouns are: He/Him/His
[D +1 604 691 6452](tel:16046916452) | [M +1 778 238 8339](tel:17782388339)

Dentons Canada LLP | [Vancouver](#)

Dentons is a global legal practice providing client services worldwide through its member firms and affiliates. Email you receive from Dentons may be confidential and protected by legal privilege. If you are not the intended recipient, disclosure, copying, distribution and use are prohibited; please notify us immediately and delete the email from your systems. To update your commercial electronic message preferences email dentonsinfo@dentons.com. Please see [dentons.com](#) for Legal Notices.

From: Wells, Michael <michael.wells@rbc.com>
Sent: Monday, February 12, 2024 8:45 AM
To: Alan Khara <alan.khara@tebo-group.com>
Subject: RE: RE: RE: RE: More on MT103 Transfer

[WARNING: EXTERNAL SENDER]

Alan, as per the email attached from last month. Nothing has changed. I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.

The wiring instructions are:

Bank Name: Royal Bank of Canada (RBC)
 Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
 Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2
Banker: MICHAEL WELLS
Banker Email: michael.wells@rbc.com



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Monday, February 12, 2024 6:09 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: RE: RE: More on MT103 Transfer



Hello Michael,

For the transfer of funds we have provided the following information:

Bank Name: Royal Bank of Canada (RBC)
Bank Address: 1055 W Georgia St, 6th floor, Vancouver , BC, V6E3S5

Account Name: TEBO Mill Construction Inc.
Beneficiary Address: 8056 Alexander Road, Delta, BC V4G1G7

Account Number: 07940 8728917

Swift Code: ROYCCAT2
Currency: Euros
Account Signatory: Alankar Sukhdev Singh Khara

Please verify that the above information is accurate, as we have not used the above euro account yet. Secondly, they have informed us that transfer will be done via Swift MT103 STP. Please verify that this provision is available. The funds will be transferred in tranches:

First Tranche: 4,997,955.00
Second Tranche: 10,314,159.00
Third Tranche: 20,265,358.00

Also, if all above is fine, please let us know of any documentation that is required on your side to process the transfer.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Tue, 6 Feb 2024 at 2:05 PM Wells, wrote:

Alan, any update on this transfer of funds?

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Monday, January 15, 2024 7:37 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: RE: More on MT103 Transfer

External/External

Hello Michael:

We also received inquiry from the RBC lawyer via our lawyers. We have provided them the process and information in reference to this transaction. We will be sending close to 12.46 M CAD to the accounts as per the timeline given. MT103 Manual transfer will be first completed by Merrill Lynch , the division of The Bank of America, and then an outgoing wire will be sent to RBC.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 10 Jan 2024 at 7:54 AM Wells, wrote:

Thanks Alan, there obviously have been a few changes in the details here. Can you remind me how much is being sent here to RBC and the currency?

Thanks

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Wednesday, January 10, 2024 8:02 AM

To: Wells, Michael <michael.wells@rbc.com>

Subject: Re: RE: More on MT103 Transfer

[External/IfExternal]

Hello Michael,

Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC are hired by TEBO to complete this MT103 manual transfer done with Merrill Lynch (Wealth Management division of the Bank of America).

Please find the information below.

Account Name: Merrill Lynch
Account Number: 6550113516
ABA Number: 026009593
(International Banks Can use Swift-BIC: BOFAUS3N)
Bank of America, N.A.
100 West 33rd Street
New York, NY 10001

Further,
Account Name: Kenneth D. Haywood Sr: Haywood & Associates International Investments, LLC
Account Number: 8XM-69A66

Bank Officer: Mr. Shawn Rodgers
Bank Email: Shawn_Rodgers@ml.com
Phone Number: (888)372-5933 Ext 1591807

Please note, after completion, it will be forward to RBC account as a SWIFT MT103.

Please let me know if anything else is required.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.
TEBO Mill Construction Inc.
Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582
Fax: 604-946-8573
Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 9 2024, at 8:43 am, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, please provide documentation to support below (amount and timing).

Thanks



Michael Wells | Senior Manager, Special Loans and Advisory Services | RBC Royal Bank | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Sunday, January 7, 2024 12:00 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External/Externe]

Hello Michael,

We have contacted three different banks that do the manual MT103 transfer of funds. In addition, they have the service to wire transfer these funds after manual transfer.

We will be having agreements with one of these banks on Monday to provide this service of manual transfer and then later wire transfer to RBC. We will be paying additional charges for these services from these banks.

The funds are ready to be transferred at this point.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Jan 3 2024, at 1:11 pm, Wells, Michael <michael.wells@rbc.com> wrote:

Alan, I have been in contact with a Product expert in RBC and have been informed that no such payment process exists for us to use.



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>
Sent: Wednesday, January 3, 2024 9:46 AM
To: Wells, Michael <michael.wells@rbc.com>
Subject: Re: RE: More on MT103 Transfer

[External//External](#)

Hello Michael,

These funds are coming via MT103. I have been informed by ENY consultancy here in Dubai that RBC has this capacity, but I need to be connected to Level 14 banker and above. Let me know if this is possible.

Best Regards,
Alan Khara, M.S., P.Eng.
Managing Director
TEBO Group of Industries



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

On Wed, 3 Jan 2024 at 8:26 PM Wells, wrote:

Alan, I will have to check with RBC's trade and wire payment group to see if what you are suggesting is even possible. I don't have expertise in this area. Seems like we should be past this last-minute issues by now. You have indicated that " funds are coming" for months now.

Mike



Michael Wells | Senior Manager, Special Loans and Advisory Services | **RBC Royal Bank** | 24th Floor, 335 8th Ave SW, Calgary, AB T2P 1C9 | T: 403-770-5821 | F: 403-292-3019 | michael.wells@rbc.com

From: Alan Khara <alan.khara@tebo-group.com>

Sent: Tuesday, January 2, 2024 10:16 PM

To: Wells, Michael <michael.wells@rbc.com>

Subject: More on MT103 Transfer

[External]/[Externe]

Hello Michael,

Further to my previous email, following is my understanding on manual MT103:

It is my understanding that the issuing bank sends the MT103 manually. Once receiving bank receives the manual 103 from Issuing Bank, they communicate with Issuing bank which they provide the receiving bank with codes which allow them to go into the swift cloud and download those funds. That is my layman's understanding in speaking with the bank.

Banks would know more. Let me know if these services are available. We will have complete Due Diligence package for RBC to review. The funds are already audited by a big law firm, and we have feds clearance too. Currently, if this service is not available, then I have to get through another bank and this will add time.

Best Regards,
Alan Khara, M.S., P.Eng.
 Managing Director
TEBO Group of Industries



tebo-group.com



TEBO Mill Installations Inc.

TEBO Mill Construction Inc.

Fraserview Fabrication and Machining Inc.

Ph: 604-946-8582

Fax: 604-946-8573

Cell: 604-341-8463

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. Please consider the environment before printing this email.

If you received this email in error, please advise the sender (by return email or otherwise) immediately. You have consented to receive the attached electronically at the above-noted email address; please retain a copy of this confirmation for future reference.

Si vous recevez ce courriel par erreur, veuillez en aviser l'expéditeur immédiatement, par retour de courriel ou par un autre moyen. Vous avez accepté de recevoir le(s) document(s) ci-joint(s) par voie électronique à l'adresse courriel indiquée ci-dessus; veuillez conserver une copie de cette confirmation pour les fins de référence future.

The contents of this message may contain confidential and/or privileged subject matter. If this message has been received in error, please contact the sender and delete all copies. If you do not wish to receive future commercial electronic messages from Bennett Jones, you can unsubscribe at the following link: <http://www.bennettjones.com/unsubscribe>