

Globevisa's replies to Radio-Canada's questions

- About settling in Quebec, Ms. [REDACTED] assertions are legally and factually correct. Your 'excerpt' shows Ms. [REDACTED] answer to "Mr. Chen's" question:

"[REDACTED]: Actually you land in Quebec, but a lot of clients, after they arrive, they ... (sic)"

This is both factually and legally correct.

Article 6(2) of the *Canadian Charter of Rights and Freedoms* reads:

Every citizen of Canada and every person who has the status of a permanent resident of Canada has the right

- a) to move to and take up residence in any province; and
- b) to pursue the gaining of a livelihood in any province.

Applicants from China, which has mobility rights limited by the household registration system, are generally keen to ascertain that they have mobility rights in a country where they might settle. This is one of the reasons for Canada's popularity.

- The "excerpt" shows that Ms. [REDACTED] mentioned on two occasions the need to "contribute" to Quebec "first". Ms. [REDACTED] meant not only the official investment which is part of the regulations, but also contribution in other ways, including trying out life in Quebec and buying a house there. Only then could the immigrant make an informed decision.
- Ms. [REDACTED] mentioned that our clients receive training. You must understand that China is a society where the least endeavor must be trained for. There are thousands if not tens of thousands of schools in China doing TOEFL, IELTS and SAT training. This does not mean that they are being trained to lie or cheat, but only to give the most appropriate answer.
- Concerning the following question: ***"As part of the application process, applicants to the QIP must sign a declaration stating their firm intention to settle in Quebec. Why did you say there was no document to sign?"***

Your "excerpt" reads:

██████████: Yes if it's an interview, than (sic) its verbal. There's no need to sign anything to say you commit to anything"

It is clear from the context, Ms. ██████ was speaking about the interview. There is actually nothing to sign at the interview.

We are aware that an applicant has various documents to sign at both the federal and Quebec stages which indicate an intent to settle in Quebec. Had "Mr. Chen" not disappeared after this first meeting and in the unlikely event that Globe Visa would have accepted him as a client, he would have been made aware of all of this. He would also have been advised in more detail about the settlement issue.

- Concerning the following question: ***"Mr. Chen told you a lot of his transactions were in cash and a lot were not declared to Chinese authorities. You told Mr. Chen he should not declare all his assets when applying to the Quebec QOP ..."***
- We note that your "scenario" did not specify if "Mr. Chen's" plastic bag factory was under sole ownership, collective ownership with a cheng bao arrangement, geti hu, or several other forms, each of which has a different basis of taxation. Quebec Immigration is well aware of these structures.

You are probably aware that the QIIP has a management experience requirement. One can either be a shareholder manager or an employee manager. Employee managers do not have to produce financial statements or tax receipts for their employers, as often they would not have access to this. They are required, amongst other things, to provide satisfactory proof of their management experience, and Individual Income Tax receipts to support their earned income.

The quota for China per year recently is 1200 investor cases from China. There formerly were many more people who wished to apply than this quota. In the past few years both our company and our competitors have mostly selected applicants who were employee managers, working for very large Chinese or international companies.

The exact number is a commercial secret for which there is no duty to disclose, but in the last QIIP intake 2017-2018, roughly 5% of our investor immigrant applicants were shareholders. The other 95% were employee managers. The 5% had very strong business documentation, including corporate and individual taxation, and banking records.

As a matter of policy this may be regrettable, see below. It is not a moral decision on our part, but strictly a business decision, the pass rate is higher this way.

There is thus practically no chance that your "Mr. Chen" would have been taken on by Globe Visa as a QIIP client. We simply had too many other candidates who would find it easier to qualify.

Let us add that the Canadian, including Quebec, scrutiny of the source of funds of investor applicants is by far the strictest in the world. It by far surpasses that of other countries with investment immigration programs and also of Know Your Client rules for banking throughout the world.

Here too the application of this policy varies but the Quebec norm is that the applicant should have positive proof of every income since they became an adult. In some cases, this will extend to the parents. It is not uncommon to see refusals because someone does not have his personal bank and tax records from ten years ago. There are cases where a person is turned down because of lack of proof of his mother's income from fifteen years ago, since she donated, as many Chinese parents do, money for the down payment of her son's apartment.

Moreover, in the past three years, the QIIP has functioned with a quota system. Investment dealers are assigned a quota by the government. In turn, investment dealers assign a quota to different consultants. There is a fixed number each year, for the world and for China in particular.

The norm in the industry is that a client who is refused is refunded his fees.

No investment dealer or consultant wants to take on a case which is problematic and which has a high risk of failure. Vast expenditure of time and resources, with no return and no possibility of making up the loss.

There are two types of immigrant investors: entrepreneurs who own all or part of a business and managers who are employees, not shareholders. China is so big that there are enough candidates in the category of employee managers working for large companies, Chinese or foreign, with well documented human resource and taxation records, to fill the quotas. In the last few years, Globe Visa, as well as our competitors, have taken on relatively few owner-entrepreneurs for the QIIP. We certainly would not take on one as weak as your Mr. Chen.

- About the possibility of acquiring new documents allowing for a change of identity: The major Caribbean Citizenship by Investment programs do not involve a change of identity. Most of these programs grant oversight and inspection to Canadian and US government officials. Much of their due diligence is carried out by companies run by retired FBI, CIA and RCMP officials.

Most European "golden visa" programs grant residence only. Citizenship, like in Canada, comes only after a stipulated number of years. The two present exceptions, Malta and Cyprus, offer citizenship by investment, but there is no change of identity.

All of these programs conduct due diligence and Know Your Client vetting about applicants. However, they do insist on seeing the applicants' mother's bank records from 15 years ago.