

Ministry of the  
Attorney General

Civil Remedies for Illicit  
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January 9, 2015

*Delivered by Fax and E-Mail to:*

**Ontario Energy Board**

Board Secretary  
Ontario Energy Board  
P.O. Box 2319, 27th Floor  
2300 Yonge St.  
Toronto ON M4P 1E4

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[boardsec@ontarioenergyboard.ca](mailto:boardsec@ontarioenergyboard.ca)

Dear Ms. Kirsten Walli, Board Secretary:

**Re: Union Gas Limited ("Union") - Application to the Ontario Energy Board for Authority to Expropriate Land in the City of Hamilton - Board File No. EB-2014-0335**

**Intervention Request Letter**

The Attorney General of Ontario through the Civil Remedies for Illicit Activities office ("CRIA") seeks intervenor status in the above noted proceeding. The Attorney General does not seek cost award eligibility.

The Attorney General has commenced and maintains a proceeding pursuant to the *Civil Remedies Act, 2001* (the "CRIA Proceeding") wherein the Attorney General seeks to obtain a forfeiture order with respect to certain assets of Manuel and Valentina Fagundes, which include the real property municipally known as [REDACTED] (the "Property").

This CRIA Proceeding is court file no [REDACTED] in the Superior Court of Justice, Civil, at [REDACTED]. The Property is the subject of the Ontario Energy Board ("OEB") proceeding.

In connection with the CRIA Proceeding, the Attorney General has registered against title to the Property Court Orders that preserve the Property and restrict all dealings with the Property until such time as the CRIA Proceeding is determined. Attached hereto is a copy of the parcel register for the Property.

It is in light of this direct interest in the Property that CRIA seeks intervenor status in this proceeding.

The OEB Procedural Order No. 1, dated December 18, 2014, which was issued in this matter (the "Procedural Order"), states that the "Board issued a Notice of Application concerning this expropriation proceeding on November 10, 2014" and that "no party responded with a request to become an intervenor." Please be advised that CRIA did not receive a copy of this Notice of Application.

CRIA requests receipt of all pre-filed material and any further notices or other material that may be issued or filed in connection with this proceeding and that all further communications related to this proceeding kindly be directed as follows:

Rosalyn Train, Counsel  
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CRIA respectfully requests acceptance of this intervention.

Thank you.

Yours truly,



Rosalyn Train  
Counsel

Copied by fax and e-mail to:

**Andy Gibbons**

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*And by letter mail to:*

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