

Ontario Council for International Cooperation

An Overview of the Anti-terrorism Legislation As It Relates to Charities

For Background Materials See Article “Pro-active Protection of Charitable Assets”
And “Charity Law Bulletin #10, #11, #12 and #14 at www.antiterrorismlaw.ca

June 21st, 2002

CARTERS

CARTER & ASSOCIATES

BARRISTERS, SOLICITORS & TRADE-MARK AGENT

Affiliated with and Counsel* to Fasken Martineau DuMoulin LLP

www.carters.ca

1

211 Broadway, P.O. Box 440
Orangeville, Ontario L9W 1K4
Phone: (519) 942-0001
Fax: (519) 942-0300
www.carters.ca
www.charitylaw.ca

www.charitylaw.ca

Overview of Topics

- **Background And General Comments About Anti-terrorism Legislation**
- **Overview of Bill C-36**
- **Criminal Code Definitions Under Bill C-36 That Impact Charities**
- **Specific Criminal Code Offences That Impact Charities under Bill C-36**
- **The Charities Registration (Security Information) Act (Part 6) under Bill C-36**
- **Proceeds of Crime (Money Laundering) Act (Part 4) under Bill C-36**
- **The Risk to Charities From Bill C-36**
- **Developing a Due Diligence Response to Bill C-36**

www.carters.ca

2

www.charitylaw.ca

1. Background and General Comments About Anti-terrorism Legislation

- **Bill C-36 Was Introduced on October 15, 2001 in Response to U.S. Terrorist Attacks and to Implement International Conventions on Terrorism**
- **Extensive Amendments to Bill C-36 Were Tabled on November 22, 2001 But Little Relief Provided to Charities**
- **Bill C-36 Received 3rd Reading on November 28, 2001, Royal Assent on December 18, 2001 and was proclaimed in force on December 24, 2001**
- **Bill C-36 Has Serious Implications For Charities and Those Involved in Fundraising on Behalf of Charities**

- **Bill C-36 Is an Extremely Complicated Piece of Legislation That Involves Co-ordinating the Provisions of Many Federal Acts**
- **Bill C-36 Needs to Be Read in Conjunction With Bill C-35 (Passed on November 29th, 2001) and Bill C-55 *Public Safety Act* (Introduced on April 29, 2002)**
- **The Full Impact of Anti-Terrorism Legislation May Not Be Fully Understood for Years**
- **Charities Will Need to Become Proactive in**
 - **Understanding the Law**
 - **Striving Toward Due Diligence in Ensuring Compliance With the Law**

2. Overview of Bill C-36

- **Part 6 of Bill C-36 Deals With Deregistration of Charities and Refusal to Grant Charitable Status**
- **Bill C-36 Also Enacts Super Criminal Code Provisions Prohibiting Funding and Facilitating of Terrorist Activities and Terrorist Groups**
- **Charities and Their Legal Counsel May Also Be Caught by the Proceeds of Crime (Money Laundering) Legislation As Amended by Bill C-36**
- **Charities and Their Directors Face Exposure to Liability Through Criminal Code Provisions That May Also Lead to Loss of Charitable Status**
- **An Understanding of Criminal Code and Other Provisions of Bill C-36 Requires a Careful Review of the Details of the Legislation**

3. Criminal Code Definitions Under Bill C-36 That Impact Charities

“Terrorist Activities” Definition

- **Bill C-36 Includes a Very Broad Definition of “Terrorist Activities” (S. 83.01)**
- **Definition Covers Situations That May Impact Charities, Which Amongst Others Includes:**
 - Acts or Omissions,
 - Both in and Outside of Canada,
 - Committed in Whole or in Part for Political, Religious or Ideological Purposes, Objectives or Causes,
 - With the Intention of Intimidating the Public With Regard to Its Security, Including its Economic Security,
 - Causes Injury, Substantial Property Damage or a Serious Disruption of Essential Services,
 - Includes Conspiracy, Attempt or Threat to Commit a Terrorist Activity,
 - Includes Being an Accessory After the Fact or Counseling in Relation to Any Terrorist Act

- **Definitions Also Include Actions Taken Against “Internationally Protected Individuals” That May Result in Creation of Domestic Terrorists**
 - **Bill C-35 Extends the Definition of “International Organizations” to Include “an Inter-governmental Conference” and Extends the “Internationally Protected Person” Status to Foreign Representatives Including Diplomatic and Other Officers At Economic Summits.**
 - **The Means of Transportation and the Area That the Internationally Protected Persons Are to Meet at Are Also Protected**
 - **Any Threatening or Commissioning of Acts to Such “Persons”, “Official Premises”, or “Means of Transport” Which is Likely to Endanger the Life or Liberty of Such Persons is a Terrorist Activity**
 - **Therefore Protestors Blocking a Road to a WTO Conference or a G8 Summit Run the Risk of Committing a Terrorist Activity**
- **Bill C-55 Also Permits the Government to Create a “Controlled Access Military Zone” in the vicinity of Economic Summits**

“Terrorist Group” Definition

- **Bill C-36 Also Includes a Very Broad Definition of “Terrorist Group” (S.83.01)**
- **Definition Covers Situations That May Impact Charities, Which Amongst Others Include (S. 83.05):**
 - **A “Listed Entity”, i.e. An Entity That The Government Has Reasonable Grounds To Believe**
 - **Has Knowingly Carried Out, Attempted To Carry Out, Participated In Or Facilitated A Terrorist Activity, or**
 - **An Entity Is Knowingly Acting On Behalf Of , At The Direction Of, Or In Association With Such Entity**
 - **An Entity That Has As One of Its Purposes or Activities Facilitating or Carrying on of Terrorist Activities**
 - **An “Entity” Includes Trusts, Unincorporated Associations and Organizations**
 - **Also Includes an Association of Such Entities**

“Facilitation” Definition

- **Recent Amendments to Bill C-36 Moved the Definition of “Facilitation” From the General Definition Section to the Specific Offence of “Facilitation of Terrorist Activity” S.83.19(1)**
- **The Move Was Stated to Make “Facilitation” Require Knowledge and Intent But Instead Results Only in Requiring That The Accused “Knowingly Did Not Know That a Particular Terrorist Activity Is Facilitated Or May Be Facilitated”**

“Facilitation” Definition

- **A Terrorist Activity Is Defined to Be “Facilitated” Whether or Not**
 - **The Facilitator Knows That a Particular Terrorist Activity Is Facilitated;**
 - **Any Particular Terrorist Activity Was Foreseen or Planned at the Time It Was Facilitated; Or**
 - **Any Terrorist Activity Was Actually Carried Out**
- **The Definition of “Facilitate” Continues to Apply to the Entire “Part” of The Criminal Code and Not to a Particular “Section” Requiring Knowledge and Intent**
- **The Broad Definition of Facilitation Therefore Applies to All Criminal Code Offences Involving Terrorism Without Reference to the Modifier of Having Knowledge and Intent in 83.19(1)**

“Facilitation” Definition

- **To “Facilitate” a Terrorist Activity May Require Only a Limited “Mens Rea” or Guilty Mind, Particularly Where There Is No Requirement for Knowledge and Intent, i.e. S. 83.04(a)**
- **This Is Different From the 1999 U.N. Convention on the Suppression of Terrorism That Uses More Intentional Language of “Willfully” and “Knowledge” in Describing Offences of Financing Terrorism**
- **Under Bill C-36, Unexpected Actions of a Charity May Therefore Result in a Charity Unwittingly Becoming a Terrorist Group**

Impact of Definitions on Charities

- **FACT SITUATION #1 - A Charity Funds an Agent in the Middle East That Operates a Hospital Which May Treat or Give Medicine to a Member of a Terrorist Group**
- **FACT SITUATION #2 – A Hospital Provides Medical Care or a Church Provides Sleeping Facilities to Student Protestors at an Anti-globalization Protest Who Erect a Road Block Leading to an International Economic Summit**

- **In Either Situation, the Charity Could Be Found to Be:**
 - **A Terrorist Group for Facilitating a Terrorist Activity**
 - **A Terrorist Group by Meeting the Definition of a “Listed Entity”**
- **The Charity Could Also Be Committing a Separate Criminal Offence of Facilitating a Terrorist Activity**
- **The Charity Could Also Lose Its Charitable Status Under the Deregistration Provisions of Part 6 of Bill C-36**

4. Specific Criminal Code Offences That May Impact Charities under Bill C-36

(S. 83.03) Directly or Indirectly Providing or Inviting the Provision of Property, Financial or Other Related Services That Facilitates or Carries Out a Terrorist Activity or Benefits a Terrorist Group

(S. 83.04) Directly or Indirectly Using or Possessing Property to Facilitate a Terrorist Activity

(S. 83.08) Dealing With Property, Facilitating Transactions or Financial or Related Services for the Benefit or at Direction of a Terrorist Group

(S. 83.11) Financial Institutions (Which May Include Charities) Are Obligated to Determine If They Possess Property of a “Listed Entity”

(S. 83.18) Directly or Indirectly Participating or Contributing to Any Actions That Enhances the Facilitation of a Terrorist Activity

(S. 83.21) Directly or Indirectly Instructing a Person to Carry Out Activities for the Benefit of a Terrorist Group

(S. 83.22) Directly or Indirectly Instructing a Person to Carry Out a Terrorist Activity

(S. 83.14) The Attorney General May Apply for an Order of Forfeiture of Property of a Terrorist Group

Impact of Criminal Code Offences on Charities

- **FACT SITUATION #1 – A Charity Through a Fundraiser Requests the Provision of Medical Supplies to Fund an Agent in the Middle East and Gives Instructions to the Agent to Use the Supplies at a Hospital That Might Treat or Give Medicine to a Member of a Terrorist Group**
- **FACT SITUATION #2 – A Charity Through a Fundraiser Solicits Funds for a Programme to Conduct Aerial Drops of Food Packages in Afghanistan Where Some Remaining Members of the Taliban Might Receive a Few of the Food Packages**

- **FACT SITUATION #3 – A Hospital Foundation Raises Funds for the General Operations of a Hospital That Provides Medical Care to Student Protestors at an Anti-globalization Protest Who Erect a Road Block Leading to an International Economic Summit**
- **FACT SITUATION #4 – A Religious Denomination Provides Funding to a Local Church That Assists Student Protestors by Providing Sleeping Facilities in its Church Basement in Fact Situation #3 Above**

5. The Charities Registration (Security Information) Act (Part 6) under Bill-36

Practical Impact

- **Even If a Charity Is Not Charged With a Criminal Code Offence, a Possible Violation of a Criminal Code Offence May Result in a Charity Losing Its Charitable Status Without the Protection of Due Process of Law**

Certificate Issued

- **Solicitor General and Minister of National Revenue May Sign a Certificate That, Based Upon Security or Criminal Intelligence Reports, There Are Reasonable Grounds to Believe That a Registered Charity or an Applicant for Registered Charity Status:**

- **Has Made, Makes or Will Make Available Any Resources, Directly or Indirectly to a Listed Entity**
- **Made Available Any Resources, Directly or Indirectly, to an Entity (*Not a Listed Entity*) That Was and Continues to Be Engaged in Terrorist Activities or Activities in Support of Them**
- **Makes or Will Make Available Any Resources, Directly or Indirectly, to an Entity (*Not a Listed Entity*) That Engages in or Will Engage in Terrorist Activities or Activities in Support of Them**

- **Concerns Involving the Issuance of a Certificate**
 - **No Knowledge or Intent Is Required**
 - **Past, Present and Future Actions Can Be Considered**
 - **No Due Diligence Defence**
 - **No Definition of What “Indirectly” Means**
 - **No Definition of “In Support of” Given**
 - **No Warning Given or Opportunity to Change the Practices of a Charity**
 - **Low Standard of “Reasonable Belief” Utilized**
 - **No Explanation Required for the Issuance of a Certificate**

Referral to Federal Court

- **The Certificate Must Be Served Upon the Charity or the Applicant and Referred to the Federal Court for Judicial Consideration**
- **A Federal Court Judge Will Then Determine If the Certificate Is Reasonable and If So, Then the Charity Will Lose Its Charitable Registration or the Applicant Will Be Ineligible to Become a Charity**
- **The Federal Court Determination Is Not Subject to Appeal and the Certificate Is Final and is Not Subject to Review By a Court**

Evidence to be Heard

- **The Federal Court “Shall” Examine in Private the Security or Criminal Intelligence Reports Considered by the Ministers**
- **The Federal Court May Also Examine Other Evidence In the Absence of the Charity If the Disclosure Would Injure National Security or the Safety of Anyone**
- **The Federal Court Can Admit Any Reliable and Relevant Information, Whether or Not the Information Is or Would Be Admissible in a Court of Law**
- **The Federal Court Can Receive In Private Information Obtained in Confidence From a Government, an Institution of a Foreign State, or From an International Organization, and Not Disclose Such Information to the Applicant or the Charity**

Effect of Certificate

- **Once a Certificate Is Determined to Be Relevant by a Federal Court Judge, Then the Registration of That Charity Is Automatically Revoked**
- **This May Result in the Loss of Charitable Property Due to the 100% Tax to the Federal Government Imposed on Revocation of Charitable Status**

Time That the Certificate Is In Effect For

- **A Certificate Is Effective for a Period of Seven Years, But May Be Cancelled Earlier Upon an Application Based Upon a Material Change of Circumstances**

6. Proceeds of Crime (Money Laundering) Act (Part 4) under Bill C-36

- ***Proceeds of Crime (Money Laundering) Act* Has Now Been Amended to Include the Financing of Terrorist Activities**
- **Subsequent Regulations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, Released on May 9, 2002, Include Definitions such as “Financial Entity” and “Money Services Business” that May Implicate Charities under that Act.**
- **Charities May Be Unwittingly Included in the Definition of Who the Act Applies to Because of the Exemption From Registration Under S.35 (2) 7 of the *Securities Act* for Charities That May be Seen As Authorizing Charities to Carry on the Business of Dealing in Securities**

- **Since Lawyers Fall under the Legislation, Monies Intended for Charities That Are Given Through a Lawyer will Be Under the Jurisdiction of the Legislation**
- **This Act Establishes the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) the Agency which Collects, Analyzes and Discloses Information Collected under the Act that may be Potentially used to Issue a Certificate of Deregistration under Part 6 of Bill C-36.**

7. The Risk to Charities From Bill C-36

Triple Threat from Bill C-36

- **Past, Present and Future Acts Can Be Considered in Revoking or Denying Charitable Status**
- **Can Involve Criminal Code Offences, Loss of Charitable Status and Money Laundering Violations**
- **Can Result in Penalties, Imprisonment and Seizure of Charitable Property**

Lack of Fairness Before the Law Under Bill C-36

- **Lack of Procedural Fairness**
 - **Limited Access to and Disclosure of Information**
 - **Normal Rules of Evidence Do Not Apply for Loss of Charitable Status**
 - **No Right of Appeal or Review for Loss of Charitable Status**

Limited Defence

- **No Due Diligence Defence Available For Charities For Either**
 - **Criminal Code Offences**
 - **Loss of Charitable Status**
- **Knowledge And Intent Have Been Curtailed**
 - **Criminal Code Offences Involving Facilitation Involve Lower Threshold Of Knowledge And Intent Than Other Criminal Code Offences**
 - **Knowledge And Intent Is Not A Requirement At All For Loss Of Charitable Status**

Discrimination Concerns of Bill C-36

- **Charities With Political, Religious and Ideological Purposes Will Be Suspect Because They in Part Meet the Definition of “Terrorist Activity”**
- **Religious, Ethnic and Environmental Charities May Be Scrutinized More Than Others**
- **Greater Scrutinization May Result in Discrimination Against Some Charities Because They Have “Religious or Ideological” Purposes**

Negative Impact on Charities From Bill C-36

- **Negative Impact on the General Public's Perception of Charities Being Associated With Possible Financing of Terrorism**
- **Negative Impact May Result by Creating a "Chill Effect" on Future Charitable Activities For International Religious and Humanitarian Aid Organizations**
- **May Restrict Co-operative Efforts With Charities in Other Countries That May Be Concerned About Exposure to Bill C-36, As Well As Similar Concerns by Canadian Charities About Anti-terrorism Laws in other Countries**

Serious Penalties and Liability to Charities and Directors

- **Directors Could Be Charged With Criminal Code Offences**
- **Agents of Charities Involved in International Operations Could Expose Both the Charity and Directors to Liability**
- **Breach of Fiduciary Duty Arising From a Loss of Charitable Property Could Lead to Personal Liability for Directors**
- **Fines, Penalties and Criminal Code Charges Are Not Normally Included in Insurance Coverage**
- **Gifts by Donors to a Charity That is a Terrorist Group May Put The Donors at Risk in Violating the Criminal Code and Will Therefore Require that Donors Make Appropriate Inquiries of Intended Recipient Charities**

8. Developing a Due Diligence Response to Bill C-36

The need for Due Diligence

- **Charities Will Need to Exercise Due Diligence to Determine If There Is Compliance And/Or Risk With Bill C-36**
- **Due Diligence Is Not a Defence for Either**
 - **Criminal Code Offences**
 - **Part 6 Certificates Revoking Charitable Status**
- **Due Diligence, Though, Can Be Effective in**
 - **Avoiding Possible Violations of Bill C-36 Before They Occur**
 - **Evidencing Thoroughness in Operations in Order to Counter Allegations of Facilitating Terrorist Activity**
- **Undertaking Due Diligence Is Mandatory in Accordance With the Common Law Fiduciary Obligations of Directors to Protect Charitable Property**

Due Diligence Through Education

- **All Aspects of Due Diligence Should Be Reflected in an Anti-terrorism Policy Statement**
- **Need to Develop Access to General Resource Materials on Bill C-36 and Other Anti-terrorism Legislation**
- **Need to Compare and Coordinate Educational Materials With Other Charities, Either Directly or Indirectly Through Umbrella Associations**
- **Need to Provide Educational Materials and Presentations to Board Members, Staff, Volunteers, Donors and Agents of the Charity**

Due Diligence at the Board Level

- **CCRA May Conduct CSIS Security Checks of Board Members for New and Existing Charities**
- **Potential Board Members Should Be Advised That a CSIS Security Check May Be Carried Out on Them**
- **Potential Board Members Should Be Required to Complete Disclosure Statements to Determine Compliance With Bill C-36**
- **Consents From Potential Directors Should Be Obtained to Share the Results of the Disclosure Statement With Board Members and With Executive Staff, As Well As Nominating Committee Members, If Applicable**
- **Consents to Be a Director Should Include an Undertaking to Immediately Report Any Material Change in the Disclosure Statements**
- **Directors Should Be Required to Complete Yearly Disclosure Statements to Confirm Compliance With Bill C-36**

Due Diligence at Staff and Volunteer Level

- **Potential Key Staff Persons Should Be Advised That a CSIS Security Check May Be Carried Out on Them**
- **Potential Staff and Volunteers Should Be Required to Complete Disclosure Statements to Determine Compliance With Bill C-36**
- **Consents Should Be Obtained From Staff and Volunteers to Allow the Charity to Share the Results of the Disclosure Statements With Other Executive Staff and Board Members**
- **Consents From Staff and Volunteers Should Include an Undertaking to Immediately Report Any Material Change in the Disclosure Statement**
- **Staff and Key Volunteers Should Be Requested to Complete Yearly Disclosure Statements to Confirm Compliance With Bill C-36**

Due Diligence Checklist of Charitable Programs

- **A Due Diligence Compliance Checklist Should Be Developed to Whether Charitable Programs Comply With Bill C-36 and the Level of Risk That Might Be Encountered**
- **A Due Diligence Compliance Checklist Should Incorporate All Aspects of the Anti-terrorism Policy That Apply to a Charitable Program**
- **Each Existing and Proposed Charitable Program Should Be Evaluated in Accordance With the Due Diligence Compliance Checklist**
- **The Results of the Due Diligence Checklist Should Be Communicated to the Board of Directors**
- **A Due Diligence Checklist of All Charitable Programs Should Be Repeated on a Regular Basis, i.e. Once a Year**

Due Diligence With Umbrella Associations

- **Umbrella Associations to Which a Charity Belongs Can Expose the Charity, the Umbrella Association, and Other Members of the Association to Risk of Being Part of a “Terrorist Group”**
- **Members of an Umbrella Association Should Be Required to Complete Disclosure Statements to Determine Compliance With Bill C-36**
- **Consents Should Be Obtained From Members to Share the Results of the Disclosure Statements With the Directors of the Umbrella Association, As Well As With Its Members**

- **Consents From Members Should Include an Undertaking to Immediately Report Any Material Change in the Disclosure Statement**
- **Members of the Umbrella Association Should Be Required to Complete Yearly Disclosure Statements to Confirm Compliance With Bill C-36**
- **Members of the Umbrella Association Should be Required to Adopt Their Own Anti-terrorism Policy Statements**

Due Diligence Concerning “Affiliated Charities”

- **“Affiliated Charities” Mean Other Registered Charities Which the Charity Works in Conjunction With, Either Through Informal Cooperation or by Formal Joint Venture or Partnership Agreements**
- **Affiliated Charities That Either Receive Funds From the Charity or Give Funds to the Charity Can Create Risks to the Charity If They Are Not Complying With Bill C-36**
- **Affiliated Charities Should Be Required to Complete Disclosure Statements to Confirm Compliance With Bill C-36**

- **Affiliated Charities Should Undertake to Immediately Report Any Material Change in the Disclosure Statements**
- **Affiliated Charities Should Be Required to Complete Yearly Disclosure Statements to Confirm Compliance With Bill C-36**
- **Affiliated Charities Should Be Required to Provide Releases and Indemnities to the Charity in the Event of Non-compliance With Bill C-36**
- **Affiliated Charities Should Be Required to Adopt Their Own Anti-terrorism Policy Statement**

Due Diligence With Regards to Third Party Agents

- **All Third Party Agents of a Charity Can Expose a Charity to Liability by Directly or Indirectly Being Involved in the Facilitation of a “Terrorist Activity”**
- **Agents That Act on Behalf of a Third Party Agent for a Charity May Also Expose the Charity to Liability**
- **All Direct and Indirect Third Party Agents Should Be Required to Complete Disclosure Statements to Determine Compliance With Bill C-36**
- **Agents Should Undertake to Immediately Report Any Material Change in the Disclosure Statements**

- **Agents Should Be Required to Complete Yearly Disclosure Statements to Confirm Compliance With Bill C-36**
- **Agents Should Be Required to Provide Releases and Indemnities to the Charity in the Event of Non-compliance With Bill C-36**
- **Agents Should Be Required to Adopt Their Own Anti-terrorism Policy Statements**

Due Diligence Concerning Donors

- **Need to Regularly Review List of Donors of a Charity to Check for “Listed Entities” or Organizations That May Be Terrorist Groups**
- **Are Restrictions Imposed by Donors on the Use of Funds That Could Lead to Violations of Bill C-36?**
- **Is a Donor Able to Use a Program of a Charity to Permit the Flow Through of Funds Directly or Indirectly to a Terrorist Activity?**

Documenting Due Diligence Through an Anti-terrorism Policy Statement

- **An Anti-terrorism Policy Statement Should Be Adopted to Document All Aspects of Due Diligence on Bill C-36, Including All Applicable Documents, Such As Statements of Disclosure and Checklists**
- **Board of Directors Should Appoint a Committee and a Key Staff Person to Develop, Implement and Review the Charity's Anti-terrorism Policy Statement**
- **The Anti-terrorism Policy Statement Should Set Out Reporting Requirements in the Event That There Is an Actual or Potential Violation of Bill C-36**

- **The Anti-terrorism Policy Statement May Be Published on the Charity's Website, With Excerpts Possibly Being Reproduced in Reports and Brochures of the Charity, As Well As Communications to Donors**
- **Donors Should Be Advised That a Full Copy of the Anti-terrorism Policy Is Available**

Evidencing Due Diligence With CCRA

- **Download as Much Evidence of Due Diligence Compliance to CCRA as Possible**
- **A Copy of the Anti-terrorism Policy Statement Should Be Forwarded to CCRA With a Request That CCRA Advise of Any Deficiencies in the Policy Statement**
- **If a New Program of a Charity May Result in Possible Non-compliance With Bill C-36, Then a Letter Requesting Approval in Advance of the Program Should Be Sought From CCRA**
- **Copies of All Agency Agreements Should Be Filed With CCRA With a Request That CCRA Approve the Agreements, Specifically as They Relate to Compliance With Bill C-36**

Evidencing Due Diligence With Legal Counsel

- **Involvement of Legal Counsel Can Provide Tangible Evidence of Due Diligence, As Well As Assisting to Insulate the Charity and the Board From Liability**
- **Legal Counsel Can Be Utilized to Review, Comment and Amend**
 - **Anti-terrorism Policy Statement**
 - **Disclosure Statement**
 - **Compliance Checklist**
 - **Particulars of a Charitable Program**
- **Legal Counsel Can Also Assist in Communicating With CCRA in Evidencing Due Diligence Compliance**