

OPERATION RING BEAR

The unlawful sale of bear parts is still very much illegal in all provinces in Canada. Severe penalties and public education have possibly resulted in investigations and occurrences where the unlawful sale is reported or found.

THE RECENT convictions in Saskatchewan and Ontario in the unlawful sale of bear parts, which you will be reading about shortly, goes to show that although the illegal activity may have slowed, it is not wiped out. Provinces like British Columbia and Ontario may continue to see an increase in the possession and unlawful export of these parts due to their position as transportation hubs that serve as gateways to foreign markets. Seizures at airports and investigations over the past five years have led officers to believe that perhaps this type of illegal activity has gone underground and those involved are much more efficient in exporting these parts to markets where they have much more value.

In Saskatchewan alone, the small instances where investigations into the unlawful trade of bear parts

may make some think that it is not an issue anymore. Dean Grisdale, Manager of Investigations with the Ministry of Environment, agrees partly with this assessment. "I think that was the perception. Certainly it doesn't seem to be at the level we were accustomed to in the 1990s and early 2000s, however, I believe that there is, and always has been, a market," says Grisdale. In his time as manager of this unit, he feels that galls have reappeared on our radar over the last three years. One new thing that officers have discovered is that a portion of those individuals who consume these galls have now also become the people actually killing the bears, both legally and illegally. The individuals involved in the

investigation in Saskatchewan were brazen, with no fears of consequences. "There hasn't been a lot of enforcement action, at least

in Saskatchewan, on gall trafficking prosecutions which may contribute to the illegal activity," says Grisdale.

Lindsey Couillard, Staff Superintendent and Manager of Intelligence and Investigation Services with the Ontario Ministry of Natural Resources and Forestry, feels that there is still an active market for bear parts. "The illegal wildlife trade is based on demand for the product. The illegal black market for bear gall bladders exists and fuels the demand," she says.



All unlawful bear commercialization information continues to be investigated by both agencies. In the end, a very successful investigation came to a close with convictions in both provinces and the substantial penalties imposed by the courts will hopefully provide a deterrent in the future for this type of activity, or at least slow it down. Both Grisdale and Couillard are happy with the penalties imposed by the courts. “The penalties are significant. As in all criminal activity, the penalties may deter some individuals from becoming or staying involved in the illegal activity,” says Couillard. Grisdale agrees, saying, “We were able to move the investigation into another jurisdiction and expose guilty parties there and convict them as well. There was a good deal of intelligence that came from this file. This may prove to be useful in the next gall trafficking file.” In the future, bringing organized groups of wildlife traffickers to justice will require a continued cooperative approach between all law enforcement agencies locally, provincially, and internationally.

This investigation highlights the cooperation between two natural resource law enforcement agencies. “The sharing of information, trends, and enforcement techniques has been established between Saskatchewan and Ontario for many years and this is the result of this excellent working relationship that involves sharing information and working cooperatively to target illegal activity,” says Couillard. “The Ontario Ministry of Natural Resources and Forestry would like to thank Saskatchewan for initiating this investigation and coordinating a combined effort that resulted in the successful joint initiative.”

In conclusion, Grisdale feels that, in a perfect world, we would have been able to identify and prosecute more associates who have an interest in illegally purchasing galls. “We know they exist but simply had to end the file at some point. Sadly, with these types of investigations, the web is ever expanding but time and resources demand that once the objectives have been met it needs to end.”



A **THREE-YEAR** investigation into the unlawful sale of bear gall bladders and paws recently came to an end with convictions and fines against a three residents of Sandy Bay, Saskatchewan, one resident of Saskatoon, Saskatchewan, and one resident of Toronto, Ontario. The investigation was a result of numerous intelligence reports generated by Saskatchewan officers from Creighton and Pelican Narrows over the past number of years. The investigation started with officers getting information that Sandy Bay residents were shooting black bears at the landfill.

those who use it. During the investigation, officers learned a lot about methods of use, consumption, and shipping of these products right from the targets themselves. It was clear that this type of activity had been happening for a number of years. The suspects, who



Clockwise from top: This large sale was for five bear galls and eight paws for \$1,700.

Vodka changes colour after bear bile is added to it.

Sept 2016. Three bear galls were purchased for \$900.



Black bear gall bladders are used in traditional Asian medicine. Their value on the black market can range from \$2,000 to \$10,000 per gall bladder. Bear paws are used for soup or broth which is then consumed. Both are believed to promote strength and good health to

were unlawfully shipping and exporting the bears unlawfully inside and outside of Canada, revealed to the officers how they were successfully shipping to international markets. As the investigation went on, investigating officers realized that there was still a demand for bear

galls and parts since the sale and export ban was implemented in 1995.

This investigation resulted in the conclusion that the trade in bear parts is still a relevant issue in Canada and that perhaps it has been driven more underground with its illegal nature. This investigation took officers from northern Saskatchewan to Saskatoon, and then to Toronto, Ontario, as the investigation intensified over time.

Sandy Bay residents started to notice an increase in the number of black bears killed and left with the entrails open and paws missing. Information came in that the bears that were being shot were having the gallbladders and feet removed, then sold to Chung's Restaurant in Sandy Bay. Officers attended and investigated and found one bear at the landfill butchered in a manner that suggested that the gall bladder had been removed. With the assistance of the RCMP, a couple of names were provided as being possible suspects in the unlawful killing of the black bears. Officers then contacted the local RCMP to see if they knew anything about the bears, or if any reports had come in. The RCMP confirmed that they knew of the killings but did not know about the value of the bear gall bladders. Informants and investigation all pointed to one individual, Marcel Sewap, who may have been responsible for killing the bears and removing the parts.

In May 2016, the Sandy Bay RCMP received information that someone in

a blue van was at the dump killing bears. The RCMP responded and located the blue van in question in the parking lot of Chung's Restaurant. Eventually, the van was stopped once it left the restaurant and the driver was identified as Marcel Sewap. With years of intelligence and information, the Ministry of Environment's Special Investigations Division initiated an undercover operation beginning in August 2016 to address the unlawful sale of bear parts in the Sandy Bay area. The undercover operation lasted 2.5 years and moved from Sandy Bay to Saskatoon, and then as the investigation evolved, it expanded to Toronto. At Sandy Bay, covert operators were used to make contact with possible targets associated with the investigation. The investigation at this point focused on Li Gen Han (G.H. Li) who was the manager of Chung's Restaurant, his wife, Luanshun Li (L. Li), and Marcel Sewap (M. Sewap).

Officers posed as individuals who were starting a hunting-related busi-



ness in the area. Officers made contact with G.H. Li and L. Li to obtain used cooking oil for their baits. During this first visit to the restaurant, G.H. Li and L. Li asked the undercover officers if they had any bear gallbladders that they would like to sell. Normally, the officers have to find a way of inquiring about the unlawful activity, but the subjects expressed interest to the officers first.

This really got the investigation rolling, as officers knew from the beginning that they had the right targets. G.H. Li purchased two bear gall bladders from the officers for \$600. The officers confirmed with G.H. Li that it was illegal to conduct these types of wildlife transactions and G.H. Li clearly understood the legalities and the implications if caught.

Officers asked G.H. Li what they did with the bear gall bladders. G.H. Li told the officers that they put the bear bile in vodka and drank it. G.H. Li showed officers the vodka bottles and explained how the bile changed the colour once added to the vodka. Fresh bear bile will change the colour of the vodka to a golden colour and after it ages, it will turn the vodka a lime green colour. G.H. Li then told the officers that he would like to purchase a gall for his aunt in Saskatoon. At this point, G.H. Li told the officers that he would like to purchase three more gallbladders.

In late September 2016, the officers returned to Chung's restaurant in Sandy Bay. G.H. Li purchased the three gall bladders for \$900. Officers asked G.H. Li if he knew anyone in Saskatoon that they could get used cooking oil from. G.H. Li provided the name of his aunt, who also owned a restaurant in Saskatoon.



Investigation started in Sandy Bay, then moved to Saskatoon and as the investigation continued, moved to Toronto.

G.H. Li placed another order for three more galls to be delivered in October, and in late October 2016, undercover officers returned to Chung's Restaurant and G.H. Li purchased the three galls from the officer for another \$900, even though he complained that the galls he received during the last sale were too small. G.H. Li then handed the officer a yellow sticky note with the phone number of his aunt, Launhua Chi (L. Chi), who ran the Jeju Korean BBQ Restaurant in Saskatoon.

During this time, officers managed to make contact with M. Sewap. Although skeptical of the officers at first, he became friends with them and even went fishing with them. Officers tried to buy galls directly from M. Sewap, but he only sold them to G.H. Li for some quick cash. As time went on, M. Sewap trusted the officers more, telling them that he had sold bear galls to G.H. Li on many occasions.

In November 2016, G.H. Li met with the officers in Saskatoon at the Jeju Restaurant. He introduced the officers to his aunt, L. Chi, so that they could obtain some used cooking oil. Arrangements were made for the officers to return to the Jeju Restaurant every two weeks for oil. As the officers walked away, L. Chi asked the officers if they could bring her some bear "breasts," as she moved her hands down on her abdomen. Unsure what she was asking for, the officer asked if she meant a gallbladder, to which L. Chi responded, "Yes ... bladder." The officer asked L. Chi how many she wanted and she responded with the number three.

In late November 2016, officers went to the Jeju Restaurant and explained to L. Chi that the selling of bear galls is very illegal and both of them could get into lots of trouble. L. Chi responded that she knew it was illegal to buy the galls but still wanted to buy the three galls that were agreed upon during the



Above: The largest sale was for six paws and eight bear galls for \$1,900.

Right: Size comparison of a bear gall compared to a fork.

previous visit. All agreed to a price of \$300 per gall. L. Chi explained to the officers that she put the bile into vodka. L. Chi also dunked the galls into boiling water for five seconds, three times each. This prevented the bile from leaking out of the gall. After that, she put the galls in a net and hung them to dry. From there, she shipped them to Toronto where they were made into pills.

Undercover officers asked if L. Chi was re-selling the galls to other people. L. Chi responded that she gave the galls to other people and they in turn give her \$300. With that being said, L. Chi stated that she had three friends who wanted two galls each. Then, as if this order was not enough, she told the officers that the cook, working in the kitchen of the Jeju Restaurant, was also interested in purchasing some bear galls. The cook turned out to be L. Chi's sister from Toronto, who bought bear galls and then exported them to China. After this, arrangements were made to include



the Ontario Ministry of Natural Resources and Forestry undercover officers to work on the investigation in Ontario. Arrangements were made to sell one gall bladder to the cook's daughter, Shun Ji Xue (J.X. Xue). Everything went through J.X. Xue in Ontario, as she was the only one who spoke English. Undercover officers in Toronto sold two bear galls to J.X. Xue. Shortly after this transaction, things in Toronto seemed to quiet down. It is believed this was due to other legal issues related to a second person involved in the undercover sale in Toronto.

To date, the transactions only included bear gall bladders, until L. Li asked if they had any right front paws from bears. They used paws for bear oil which helped to heal burns from the deep fryer in the kitchen.

Officers returned to the Jeju Restaurant in December

2016. They met with L. Chi, who asked if they had the bear galls and paws. Officers had the galls, but did not bring the paws. They wanted to make sure that L. Chi was still interested in the paws before they brought them to sell. The officers and L. Chi agreed on a price of \$20 per bear paw, but now, L. Chi wanted the whole bear leg as she had friends who would pay \$100 for four legs and would buy as many as they could get to use the legs and paws for soup. With the number of people now involved, the officer once again reminded L. Chi that it was very illegal to sell these items and that they could get into lots of trouble. L. Chi acknowledged that this act was illegal and told the officers that she would not say anything. Officers sold L. Chi

one gall for \$300 and the other two galls to her sister for \$600. L. Chi's sister told the officers, through L. Chi, that she wanted as many galls as she could get and also wanted the price lowered to \$200 per gall. She dried them and took them back to Toronto. Officers stuck with their price, as \$300 was a fair and average price for bear galls.

Just before Christmas 2016, officers made another visit to the Jeju Restaurant. L. Chi told the officers that many Asian people were coming to Saskatchewan because there are lots of fish to eat, and now she can provide bear parts. During the conversation, she told the officers that she used to have someone in Sandy Bay supply her with bear parts, but now she is dealing with the undercover officers. When reminded again about the legalities of selling bear galls, L. Chi advised

that she had instructed everyone to simply say that the bear parts were gifts and not to say anything. Chi asked the officers if they had any galls with them as her sister was going back to Toronto at the end of the month and she wanted to send three galls back with her. Rather than taking them on the plane, she

planned to simply mail the dried galls to Toronto in a box of clothing. Prior to the officers leaving, L. Chi purchased one bear paw from them for \$20.

In January 2017, officers again visited the Jeju Restaurant. L. Chi purchased three paws from them for \$60. During a conversation with the officers, L. Chi advised that she wanted two galls for her brother and a friend who both live in China. She did not want to send them in the mail, as the mail was examined closely for this type of activity. She said she transported them personally by drying them, freezing them, and wrapping them in tin foil in her clothes. She

disclosed to the officers, "I haven't been caught yet." L. Chi told the officers that her sister would want two or three galls when she returned from China. Officers again reminded her of the illegal activ-



L. Chi's sister purchased two galls from officers for \$600.

Left: Galls were prepared in a manner that they could be shipped to Toronto without being detected.



ity and that they could get into lots of trouble. Officers, while playing their role, stated that they did not trust L. Chi's sister as she did not speak English

really well and might not know this activity was illegal. L. Chi countered the officer's statement by saying that it is illegal in China too. Prior to the officers leaving, L. Chi reminded them that she has a friend who would take as many bear paws as they could provide and that her sister also wanted pelicans, rabbits, or ptarmigans for food.

Further into January 2017, officers returned to the restaurant with two galls, but L. Chi did not want to buy them, as her sister would take them. They purchased the galls for \$600 and ordered a leg and paw as well. A few months passed, as the ability to harvest

bears was low because of their dormancy over the winter. In March 2017, L. Chi ordered two galls for her sister who was leaving for Toronto in early April. Officers attended the restaurant

on April 7 and learned that L. Chi's sister had left the country early, as she had not been feeling well. The officer told L. Chi that he had a friend in Toronto who could sell her sister some galls too in hopes of increasing the players in this illegal venture. L. Chi then purchased one bear gall bladder for \$300.

In mid-May, L. Chi put in a large order of gall bladders: four for herself and four for her sister. Officers attended the restaurant and learned that L. Chi's sister was still in China, but the new kitchen cook wanted to buy eight to ten galls. While at the restaurant, L. Chi bought a bear leg for \$50. Moving

forward to July 5, 2017, an officer went to the Jeju Restaurant and L. Chi put in an order for five gallbladders and eight legs/paws. L. Chi then provided the officer with contact information for G.H. Li's mother in Toronto, as well as contact information for her sister, now living in Toronto.

In July 2017, the two undercover officers returned to Chung's Restaurant in Sandy Bay. G.H. Li was not around, but L. Li met with them. She looked at a bear leg and told the officers that she wanted the paws only, with no fur on them. Officers replied that the cost would now be \$25 per paw. The officers left and returned with only the paws. L. Li then placed an order with the officers for five bear galls and eight bear paws. She agreed to a price of \$75 for four paws and \$300 each for the bear galls.

In late summer 2017, officers went back to the Jeju Restaurant, where a large sale was finalized. L. Chi purchased six galls and eight legs for \$1,900. Over the next couple of months, there were several conversations between the undercover officers and L. Chi, and a new

order was placed, but no transactions were completed. By this time, officers were confident that L. Chi was not going to be able to provide any more buyers or markets for bear parts. She was the distributor and would not provide any more names or contacts to other potential markets. All buys in Ontario were completed and no additional interest was observed from other potential buyers.

The take-down by uniformed officers in Sandy Bay happened on March 13, 2019. Seizures included a bottle of vodka containing bile and a bag of galls that officers sold to the suspects. Charges were levied against all three individuals in the Sandy Bay investigation. All three individuals pled out in provincial court and received the following penalties:

- Li Gen Han – Seven counts of trafficking in wildlife - \$23,800
- Luanshun Li – Three counts of trafficking in wildlife - \$8,400
- Marcel Sewap – One count of wildlife trafficking in wildlife - \$2,800

Justice of the Peace Paula Liu heard the case against Shun Ji Xue of Toronto in Toronto Old City Hall Court, convicted her of unlawfully possessing bear gall bladders, and issued a fine of \$3,250.

In Saskatoon, Launhua Chi was charged with seven counts of trafficking in wildlife but she pleaded not guilty. During her trial in late November 2019, L. Chi's lawyer contested that there had been an abuse of power and entrapment. The judge ruled that entrapment was not an issue, as it was L. Chi who introduced the idea of buying bear parts from the officers. "There was no persistence by the police before she agreed to the first purchase ... no pressure by the police. She brought up the possibility of the sale before they mentioned it. The actions of the police were not of a type to induce an average person to commit these offences. They used no trickery, rewards, or threats," said Judge B.J. Bauer.

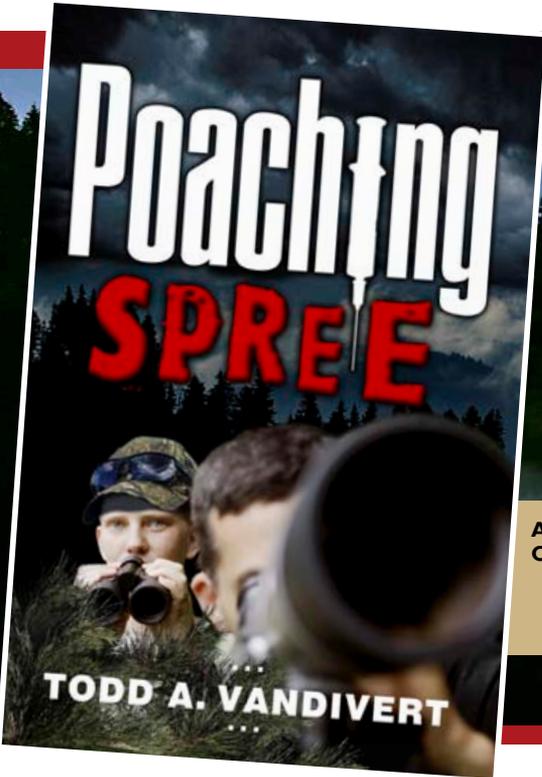
L. Chi contested that she did not speak or understand English which resulted in her committing these offences. Judge Bauer once again disagreed, referring to evidence from officers that they only spoke to L. Chi in English, she had acted as an interpreter between the officers and her cooks, and the fact that, throughout the trial, she made her own notes in English. "I find that her evidence was an attempt to minimize her involvement in the purchasing and resale of bear parts and

I do not accept her evidence where it conflicts with the investigators," Judge Bauer stated during the sentencing. In mid-December 2019, Launhua Chi was found guilty on all counts and given a \$29,120 fine.

Saskatchewan Investigations Manager Dean Grisdale is happy with the outcome of the investigation. "Overall, I am quite satisfied with the outcome and the penalties. We were able to move the investigation into another jurisdiction and expose guilty parties there and convict them as well," states Grisdale. As mentioned, the investigation ended rather abruptly after L. Chi was unable or unwilling to provide officers with more markets. "In a perfect world, we would have been able to identify and prosecute more associates who have an interest in illegally purchasing galls. We know they exist but simply had to end the file at some point," he said. ☞

☞ *Author: Lindsey Leko. Lindsey is a member of the Saskatchewan Association of Conservation Officers.*

All information gathered in this feature was taken from court transcripts.



POACHING SPREE

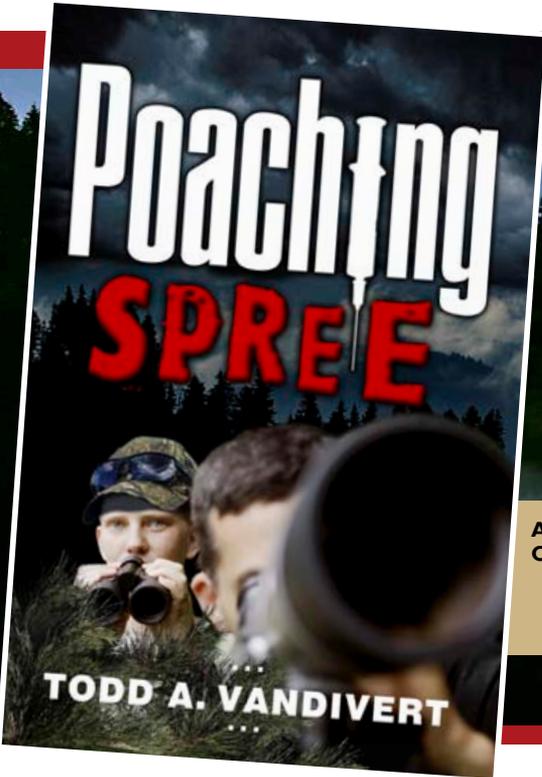
By Det. Todd A. Vandivert

Stationed in a small remote county on the Washington/British Columbia border, Wardens Clay Newberry and Lisa Bennington are faced with a big game poaching spree far beyond anything ever faced in the state before. Poachers are dropping dozens of deer and bear and leaving the carcasses behind to rot, for no apparent reason, while leaving virtually no physical evidence.

At the same time, the small county is being ravaged by an epidemic in heroin, fentanyl, and meth, leaving their resources spread thin.

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The sequel, *To Protect a Predator*, is due for release on Amazon in March 2020.



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