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**MARTIN'S CRIMINAL CODE
COUNSEL EDITION**

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What's New in this Update:

- Reference should be had to R. v. Vallières, 2022 SCC 10, where the court held that a judge imposing a fine in lieu of forfeiture under s. 462.37 does not have the discretion to limit the amount of the fine in lieu to the profit made from a criminal activity.

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