



As always Fast Track Tax Strategy strives to keep all past and present donors updated on any new information.

As per our last update (October 10, 2013) on the COIP and Mission Life programs, we are aware donors, ourselves included, are receiving emails and letters stating additional funds are owed. You may have received correspondence from one, or all of the following: Mission Life, COIP, SunRX, Profitable Giving, Justice Trading, Integrated RM or Speedy Collections. All of these organizations are contacting donors looking for additional funds, as stated in our previous email, no additional funds are owed.

Mission Life has sent out emails advising donors not to have dialogue with nor pay Profitable Giving/Justice Trading and in turn, Profitable Giving/Justice Trading are stating the same about Mission Life.

See Note 1

Profitable Giving/Justice Trading (same organization) is a company formed by former key individuals from Mission Life. They are advising donors that they are there to support past and present donors and educate them but want donors to sign up for a membership. ANY ORGANIZATION contacting you to ask for additional funds for past participation is NOT REQUIRED.

Fast Track is advising if anyone contacts you for funds you have the option to dispute it by sending in the dispute letter for your province, please [click here](#) to request the dispute letter. These organizations are using the same techniques we have advised you Canada Revenue will use which are fear tactics. They claim that donors who fail to pay them may have to pay back any tax credits. That is a false statement as only the Tax Court of Canada would be able to decide that not these organizations.

See Note 2

They also make claims this could affect your credit and collections proceedings may begin. As stated at the time of participation by COIP and Mission Life after you make your original donation there won't be any additional funds owing, so donors have the right to dispute this debt. Once the "debt" is disputed in writing no collection agency or organization can contact the "debtor" until the dispute is dealt with.

See Note 3

COIP and Mission Life no longer promote new tax shelters and instead are attempting to profit from past donors. Profitable Giving/ Justice Trading also profit by advising donors to purchase pharmaceuticals through them instead of paying COIP and Mission Life.

In summary, any organization asking for additional funds or purchase of pharmaceuticals from past participation in the tax shelters mentioned above is not valid and can be disputed. Fast Track can understand there are conflicting statements being made by these organizations. It is best to take a step back and look at what is being said and make an informed decision. Fast Track is the only organization offering the advice that donors can dispute the fact an amount is owed and Fast Track gains nothing from this advice except knowing past donors won't be taken advantage of.

See Note 4

Sincerely,

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Your Future Starts Now

Note 1.

Profitable Giving Canada (PGC) is a federally registered Not for Profit organization created in May of 2010 (Registration #753727-1). As a Not-for-Profit, and according to our bylaws, **none of the members, directors or officers have any financial gain, salary, or benefit of any kind.** PGC gets money from membership fees, which can only be used for the benefit (not pecuniary) of its members. One of the benefits presently being received by PGC members is representation in Federal court for the 2012 tax assessments being withheld by CRA.

PGC's Mission is to regulate the tax shelter industry from abuse and look out for the "little guy" who participated. **There is no ownership or control of PGC, it is controlled by the members. The Members elect the Directors and**

the Directors elect the Officers. That's how Not-for-Profits work. The corporation has no shareholders, it was incorporated by Letters Patent which are available for viewing on the PGC website to prove its status. Fast did not look into the facts before they made false and misleading statements about PGC.

Justice Trading is an international company set up in late 2012 for the purpose of helping donors settle their donation debts with certain tax shelter companies in Canada. The owner and shareholder never was a Canadian resident, but was convinced by a group of Canadian taxpayers that this could be a valid business opportunity and assist people in trouble at the same time. An international company was needed in order to procure the proper pharmaceuticals on the international market. www.justicetrading.com

PGC has no control over Justice and Justice has no control over PGC. PGC and Justice have no commercial arrangements. PGC has researched the Justice Pharma program and granted its endorsement to it. This endorsement has been misinterpreted by some organizations to perpetuate false and misleading statements regarding the relationship of PGC and Justice. PGC's motivation for doing this is to protect the donors tax credits. PGC has nothing else to gain other than live up to its Mission for the benefit of its members and other donors.

Some of the volunteers currently serving with PGC have previously been independent agents for the programs presently under investigation by PGC, such as COIP and Mission Life. These people served the same function as Fast agents who also sold the COIP and MLF programs independently to their clients. Some of the Canadian affiliates for Justice Trading were also previous independent agents for COIP and MLF, again in the same fashion as the Fast agents were. It is PGC's view that all agents have an ongoing responsibility to serve their clients as best as possible and should invest the time and recourses to get the facts straight before making recommendations.

Note 2.

The agents advising clients seem to have a disagreement regarding the debt settlement. Fast is telling their clients to do nothing. The RPGA companies themselves, like COIP and RLG believe they have the right to collect on these debts. PGC is of the same opinion. If they did not have the right, the loan would be a partial recourse loan and the donation would not be a valid donation for tax purposes. Fast says it is a false statement that disputing the debt will mean repaying the tax credit. This tax advise has been warned against in a previous PGC [Alert A13-15](#) for the reasons shown. Fast advises clients that it is only the tax court that can decide the final outcome, so just wait and see. Fast is correct that it will be the tax court that will decide, but it will decide on the basis of what you do. There will be groups of people who have treated the debt as real and settled it compliantly with tax law. Then there will be groups of people who just did nothing, treating the debt as partial recourse, not real. The tax court will decide each group based on the facts of the group. PGC has taken the time and expense to consult with qualified tax lawyers and advisors. This includes the tax expert who actually constructed the MLF program in the first place. Based on this information, and the legal opinion from Doris Law Office Professional Corporation that is posted on the PGC website, PGC is making its recommendations. We suggest you ask Fast to post their legal and professional sources for their recommendation. It is true, that collection companies cannot collect debt that is in dispute, but the CRA can collect tax that is not properly acquired by the taxpayer. So do you just wait it out for the tax court to decide, or should you check it out before hand?

Note 3

Who told you there would be nothing more to pay in the future? Was it Philip Trudelle at RLG, or Robert Steen at COIP? NO, they never said that in writing. They were very clear not to do so and for very specific reasons. Did you read it in the contracts you signed? NO, the contracts do not show any requirement for forgiveness. On the contrary, the contracts that everyone signed give the very specific options on how the debt can be settled down the road. It was the independent Fast agents and other independent agents who told clients they would not have to pay more. So the original debt is real according to its original terms that everyone signed on to. You actually want the contract to be real, since one of the strongest arguments from CRA to disallow your donation is that the contract is not real (a sham contract). Read your proposal letters from CRA.

Note 4

It is true that Fast is the only organization telling people to ignore the debt; most law firms, tax experts, and legal advisors who have opined on the situation have a different opinion. PGC also believes that donors should take a step back and get advice. Fast is not the only organization that gains nothing from donors, PGC provides this information freely and with no obligation to become a member.

PGC strongly encourages Fast to get the facts straight regarding PGC, Justice and the tax consequences of not dealing properly with the initial donation debt or disclose the source of their information.