

July 8, 2013

Mr Robert Steen  
Group Founder and Senior Manager  
The COIP/RLG/MLF/PGI Group of Companies

Also addressed to: Steve Arnold, Terry Bey, Alfred Gembicki, Zeev Landesberg,  
Steve Munden, and Phil Trudelle,

Delivered via email [info@coip.name](mailto:info@coip.name), [info@panaggregate.com](mailto:info@panaggregate.com), [info@relieflendinggroup.com](mailto:info@relieflendinggroup.com)

Dear Mr Steen et al,

We are writing to you again jointly even though you have chosen to respond to our June 25 letter via RLG/MLF and Phil Trudelle. It is unfortunate you have decided to not provide any answers to the questions asked, however, we have sufficient information to proceed with our Investigation 13-001 and are issuing an interim report. The report is attached and is available on our website as well, along with this letter and your letter of July 3, 2013.

In response to some of your concerns.

Profitable Giving Canada (PGC) is in fact a Not for Profit Organization in spite of your claims to the contrary. If you had taken the time to check the Industry Canada website, you would see our registration number 753727-1 and letters patent dated May 12, 2010, long before the inception of Justice Trading Ltd. If you were to review the bylaws, you will see that none of the directors or members receive any compensation. In fact, the governing legislation specifically prohibits PGC members from receiving any pecuniary benefit whatsoever.

PGC does in fact have a testing and accreditation regime for RPGA Promoters. It was established in the summer of 2011 and is clearly shown on our website, including the testing, disclosure, and code of ethics. One of your organizations actually approached PGC through a third party to submit to this regulatory regime in the spring of 2012, however, withdrew shortly thereafter for unknown reasons. We would again encourage you to participate in the PGC regulatory and accreditation program. All of the PGC directors and most of the PGC Committee chairs have gone through the testing, understand the law and compliance issues, and have attested to the code of ethics. You are welcome to check their status through the verification system on our website.

We understand that Justice Trading Ltd (JTL) is a for profit company, established to provide debt settlement and legal services that your organizations failed to provide until now. There is no commercial relationship between PGC and JTL. PGC has, however, endorsed the JTL Pharma Program and this is clear on our website. We do not understand the reasons for you disclosing the \$5million commissions you paid to the undisclosed number of your former agents. We do understand, however, that your organizations, including Integrated Receivables Management Inc, do pay very high commission rates, much higher than Justice Trading Ltd reportedly pays to their affiliates. This, however; is again irrelevant to the current PGC investigation.

We will let your donors and our members decide for themselves whether or not they have complained to you or to us about your collection activities.

Please provide details of what part of Schedule A is "fictitious". Are the photos not matched correctly with the names? Are the family relationships in error? Are the business titles and relationships in error? Did you not share staff and offices on Kodiak Crescent in Downsview? Has one or more of your executives not complained about losing control of his own company?

You have mentioned that Mr Shy Kurtz and Mr Bruce Allen were formerly engaged by your organizations in various capacities. We understand that to be correct, however, it is irrelevant to your current activities which are totally under your control. We are pleased that both of these individuals are now offering volunteer services to PGC, through the roles described on our website. They provide a wealth of information based on their experience and knowledge. Contrary to your allegation, however; Bruce Allen has not provided any of your donor information to PGC.

We expect to complete our investigation as soon as possible and issue a final report to you, our members, and other parties as appropriate.

Yours truly,



J. Jaye Torley  
President  
Profitable Giving Canada