

SUBJECT: Beware of Integrated Receivables Management Inc.

This ALERT pertains to the following Registered Profitable Gifting Arrangements:

Canadian Organization for International Philanthropy (COIP)
Relief Lending Group (RLG)
Mission Life Financial (MLF)
PharmaGifts International (PGI)

The ALERT

The message below is typical of messages sent recently by one or more of the above mentioned RPGAs. It is very important that you do not respond to this initiative.



Dear [REDACTED]

Re: Your 2009 Relief Lending Group (RLG) Donation Program.

We are pleased to advise you that we have arranged for you to settle your indebtedness with complete confidence.

This very important final step can satisfy all such loan obligations associated with your 2009 participation in the RLG program.

To assist you in the process of securing the required pharmaceuticals; **Integrated Receivables Management Inc.** has been appointed as the facilitator for your pharmaceutical purchase. Integrated Receivables Management Inc. is a Canadian company that is well suited and authorized by RLG and Agkuran Distributing Ltd. to service your requirements.

Please click here to view the [2009_rlgpurchasestatement.pdf](#) which provides a summary of your participation in the 2009 RLG program and presents you with the opportunity to purchase the pharmaceuticals you require.

Upon receipt of your payment, your coupon will be returned to RLG. You will then be sent a copy of your signed Promissory Note marked "Paid In Full". At this point, you will be refunded any interest on account.

Please note, cheques should be made payable to:

Integrated Receivables Management Inc.

10 Milner Court, 3rd Floor

Scarborough, ON

M1B 3C6

Sincerely,

Relief Lending Group Inc.

PGC Analysis and Recommendation

PGC has reviewed the RLG proposal and would like Members to understand the following important facts and recommendations:

Integrated Receivables Management Inc (IRMI)

This company is an Ontario corporation which changed its name to Integrated Receivables Management Inc. on February 1, 2013. Previously it was a numbered Ontario corporation 2283652 Ontario Inc. established May 3, 2011. The sole director and officer is currently registered as Jamie Landesberg, also known as Andy or James Rosen. The corporate head office and the director's address are the same. The mailing address is different. A page from the Ontario Ministry of Government Services Corporate profile report is shown as Appendix 1.

Jamie is/was an employee and representative for several of the aforementioned RPGAs. Jamie is also the son of Zeev Landesberg, one of the directing minds and original founders of this group of tax shelters. IRMI is certainly not an independent or arm's length entity to the corporation that you owe your debt to. It is the opinion of PGC, that IRMI is de facto controlled by the same people that control the aforementioned RPGAs.

What does this mean? It means that if you choose to settle your debt using IRMI, it will not be done at arm's length. The CRA's position of a sham loan, with a sham debt settlement will be proven correct and the tax credits originally obtained will most likely be forfeited. It is the number one priority of PGC to protect its Members' tax credits, and therefore we cannot recommend using IRMI for settling donor debts.

Other Factors

PGC has also determined some other alarming factors that prevent us from endorsing the IRMI solution to debt settlement.

1. There is no declaration that your purchase of pharmaceuticals to settle your debt will be evidenced by anything other than a "Paid in Full" statement from RLG. This is totally unsatisfactory to the CRA and/or the tax court. The debt settlement will surely be subject to a rigorous audit that requires a full set of documents prepared by professionals detailing the process as outlined in the original contracts. Please refer to [PGC Technical Bulletin T13-11](#) for more details.
2. RLG is making some promises on behalf of Agkuran and IRMI, but they are supposed to be arms length corporations.
3. The telephone of IRMI is answered by Lance Stainer, a large promoter of MLF and PGI in western Canada. This cannot possibly be an arm's length organization.
4. Quoting the RLG email: "Upon receipt of your payment, your coupon will be returned to RLG" If you truly are purchasing pharmaceuticals to settle your debt, it is virtually impossible for this to happen at the speed they imply. It is, however, very possible for this to happen quickly if the transactions are sham transactions.

PGC Member Recommendation

PGC recommends Members do not use IRMI to settle their donation debts. PGC recommends Members review the other ALERTS and Technical Bulletins on the PGC website to assist you with your decisions.

APPENDIX 1

Request ID: 015277517
Transaction ID: 50696900
Category ID: UNE

Province of Ontario
Ministry of Government Services

Date Report Produced: 2013/04/22
Time Report Produced: 16:14:13
Page: 2

CORPORATION PROFILE REPORT

Ontario Corp Number

Corporation Name

2283652

INTEGRATED RECEIVABLES MANAGEMENT INC.

Corporate Name History

Effective Date

INTEGRATED RECEIVABLES MANAGEMENT INC.

2013/02/01

2283652 ONTARIO INC.

2011/05/03

Current Business Name(s) Exist:

NO

Expired Business Name(s) Exist:

NO

**Administrator:
Name (Individual / Corporation)**

Address

JAMIE
LANDESBERG

13 HEATHDALE ROAD

TORONTO
ONTARIO
CANADA M6C 1M7

Date Began

First Director

2011/05/03

NOT APPLICABLE

Designation

Officer Type

Resident Canadian

DIRECTOR

Y