



March 23, 2013

Justice Trading Limited
c/o Canadian Affiliate
909 17th Avenue SW, 4th Floor
Calgary, AB
T2T 0A4

ATTN: Mr Tal Cohen
President and CEO

Dear Mr Cohen

We have received your application to have Profitable Giving Canada (PGC) review, evaluate, and grant PGC endorsement to your donation debt settlement program, commonly known as the “Justice Pharma Program”. With this program, it is your intention to compliantly assist donors/participants to settle donation debts incurred by participation in the following Canadian RPGAs:

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

In order for us to properly evaluate the Justice Pharma Program, PGC formed the “PGC Debt Settlement Committee 2012” and gave it an authorized mandate to review and evaluate your program and report to the PGC Board of Directors. The Committee was formed with senior members coming from the PGC Provincial Affairs Committees, the PGC Peer Review Committee, and the Executive Committee. All PGC Committees are authorized by the PGC Board of Directors and any findings or reports issued cannot be made public until approved by the PGC Board of Directors.

The PGC Debt Settlement Committee evaluated the Justice Pharma Program over a period of approximately 3 months. The Committee reviewed all of the Justice documents, applications, marketing material, legal opinion, and other relevant information. The criteria for evaluation is outlined in the Committee formation mandate on the PGC website; however, the most important elements are summarized as follows:

1. The steps and actions you undertake must result in the donors’ debts being settled 100% compliantly and according to the terms of the contracts each participant signed, whether the contracts are all the same or all completely different.
2. The terms of settlement you undertake to execute must have every key transaction independently reviewed on an ongoing basis and approved as compliant by a Canadian professional entity that is bound by a regulatory code of practice or professional responsibility, and covered by professional liability insurance. (Eg: a Canadian law firm, or Escrow Agent.)

3. The settlement vendor/organization must be independent and “arms length” from any of the aforementioned RPGAs or related entities.
4. The Committee was to determine if Justice meets or needs to meet all the requirements of an “authorized vendor” as described in the donors’ agreements.
5. The donors/participants must be provided with an effective mechanism to obtain refunds of any un-accrued prepaid interest that the RPGA or related entities may or should hold in trust or on account for them.
6. The process must be compliant with Canadian income tax law, so as to strengthen and establish a clear position of the donor with respect to any tax credits originally obtained as a result of his/her donation. The transactions must be available for audit by the Canada Revenue Agency if required.
7. The donors/participants must be protected through all aspects of the debt settlement program by terms and conditions that are enforceable by donors/participants in Canadian courts. This includes protection from actions taken by any RPGA as a result of the donor’s attempt to settle his/her debt using the Justice Pharma Program. Donors/participants should have the ability to deal directly with a local Canadian entity.

We are pleased to advise you that the Debt Settlement Committee has finished its review and evaluation of the Justice Pharma Program. The Committee report and its recommendations have been approved by the PGC Board of Directors. The Committee has made a full and enthusiastic endorsement of the Justice Pharm Program, based on compliance to the aforementioned criteria . As a result, Profitable Giving Canada gives its full and unreserved endorsement to the Justice Pharma Program. Justice Trading Limited is hereby authorized to use this endorsement to its benefit along with the use of the PGC logo where appropriate, but only in the context of the Pharma Program. Justice Trading Limited is not authorized to use the name or goodwill of PGC for any other commercial activity outside the scope of the review conducted by the PGC Debt Settlement Committee.

We offer our sincere congratulations to you for the extensive work and preparation that has gone into the creation of the Justice Pharma Program. We believe that you offer donors/participants the best opportunity possible to compliantly settle their debts associated with the aforementioned RPGAs.

Please contact the undersigned if you have any questions.

Yours truly,



President
Profitable Giving Canada