

Monkey Business

Prepared by
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November 26, 2018

Chimp Foundation &
Other Bromley Charities



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SUMMARY

- Charities play an important role in the social and economic fabric of Canada. It is important that the credibility of the charitable sector is kept and that public trust in charities is upheld. It is also important that charities operate for purposes that are *exclusively charitable*, as required by law.
- This report exposes a network of charities established by Blake Bromley, a Vancouver lawyer, and the employees and associates of his company, Benefic Group Inc. Mr. Bromley claims to have registered 650 charities and executed more than \$2 billion of charitable giving.^{”3} The analysis presented here has identified more than 100 Bromley charities and finds that many appear to be shells.
- A “shell” charity is a charity in name only. Shell charities serve purposes that are not exclusively charitable. Some play a role in schemes to obtain undue tax relief. Some shell charities may serve to “canadianize” funds from outside Canada.
- One of the charities at the centre of the Bromley network is Chimp Foundation. At least \$100 million of Chimp’s revenue and expenditures is from/to other Bromley charities and is circular in nature such that the true size of Chimp’s charitable operation has been greatly inflated.
- Conclusion: The charitable status of shell charities should be revoked. Questions need to be answered about why CRA allows Chimp Foundation and its affiliated charities to operate despite what appear to be brazenly obvious violations of the Income Tax Act. This analysis also raises questions about how many of Canada’s 86,000 charities are shells and the extent to which the size of the charitable sector has been inflated by shell charities and circular grantmaking.

¹ <http://www.cra-arc.gc.ca/chrts-gvng/chrts/bt/nnlrprt/2015/Charities%20AR.eng.pdf>

² <https://thephilanthropist.ca/2018/01/canadas-charitable-sector-what-to-expect-in-2018/>

³ <http://www.beneficgroup.com/blake.php>

Introduction

The analysis presented ahead finds that Chimp Foundation is engaged in circular grant-making with other charities created by Blake Bromley and employees of his company, Benefic Group Inc. These charities are referred to here as “Bromley Charities.”

Circular grant-making is paying funds to organizations that then return a significant portion of those funds, either directly or indirectly via an affiliated charity.

Except for Chimp, none of the Bromley charities have staff. Most report no fundraising at all. None appear to be financially autonomous. As it appears, most of these charities appear to be shells, multiple pockets in the same pair of pants.



Bromley Grantmaking

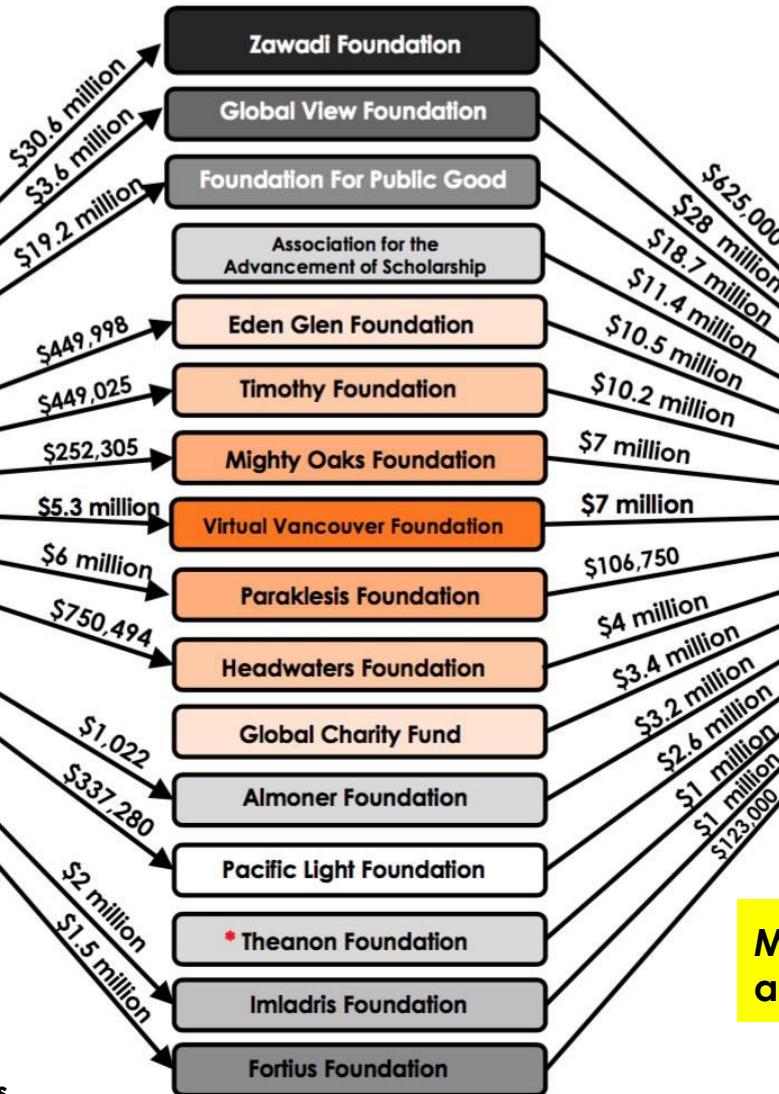
This figure shows how Chimp has paid roughly \$100 million to Bromley charities and has received roughly the same amount from the same charities.

From:

Chimp Foundation

Other Bromley Charities:
o Viva Voce - \$14 million
o Acappella - \$5 million
o Maple Syrup Mafia - \$1.8 million
o Others - \$8 million

Expenditures:
Gifts to Qualified Donees
(2011-2017)



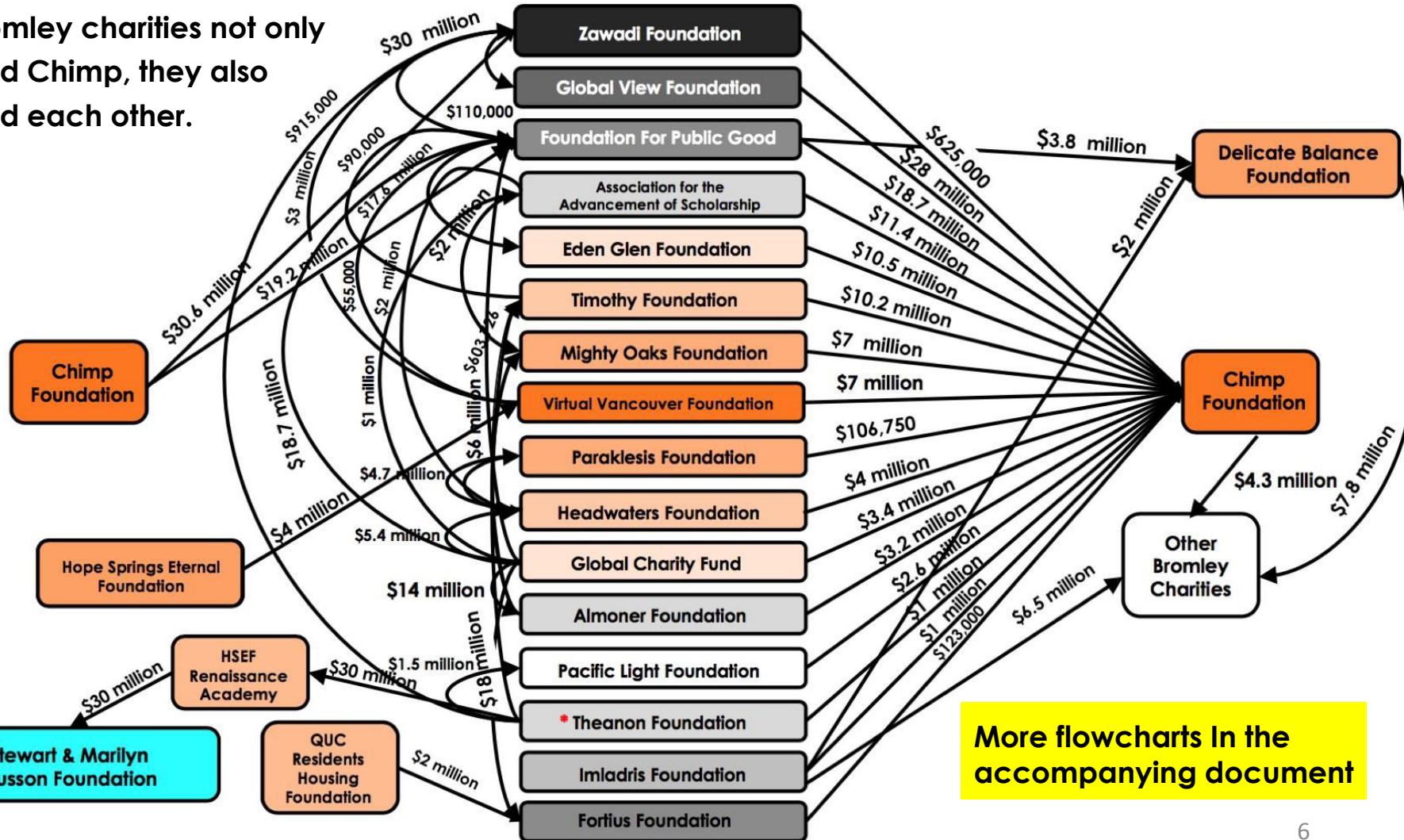
Revenue from
Bromley Charities
(2011-2017)

Chimp Foundation

More flowcharts In the
accompanying document

Bromley Grantmaking

Bromley charities not only fund Chimp, they also fund each other.



More flowcharts In the accompanying document

Bromley Charities: Same Directors. Same Address.

All of the Bromley charities have more or less the same core group of directors, consisting of Blake Bromley and employees or associates of his company, Benefic Group Inc.

All of the Bromley charities also have *the same address* as Chimp Foundation.

Except for Chimp,
none of the Bromley
charities has a
web-site or an
on-line presence.



Bromley Charities: Same Directors. Same Address.

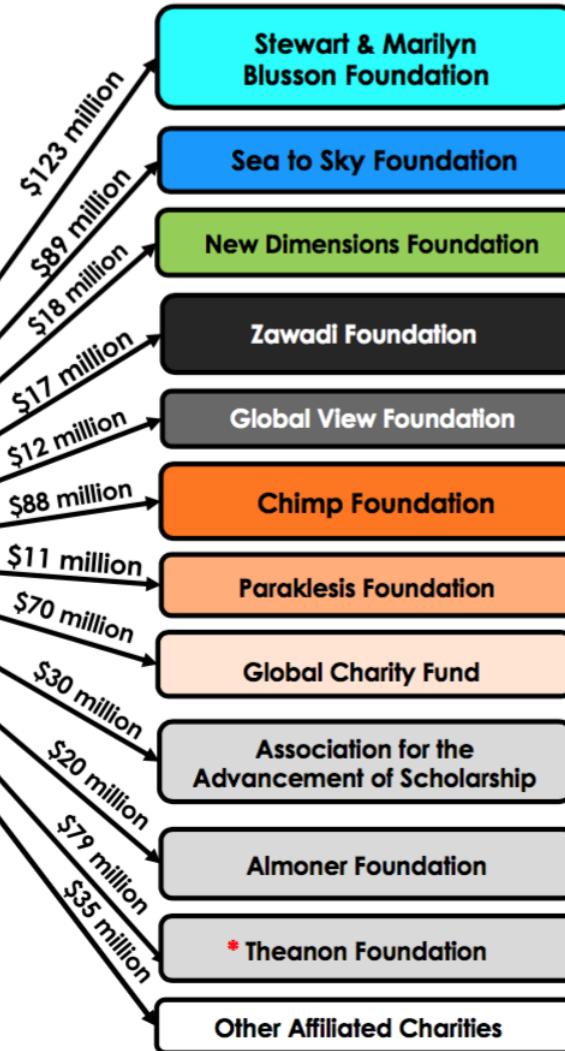
A partial
list of
Bromley
charities.

Charity	Blake Bromley	John Bromley	Leslie Brandlmayr	Alexander Salas-Sanchez	Sheila Britton	Christopher Richardson	Victoria Nalugwa	Erin Dexter	Same Address As Chimp?	Web-site?
1 Almoner Foundation	X					X			Yes	No
2 Canadian Education Forum	X		X			X			Yes	No
3 Chimp Foundation	X	X		X		X			Yes	Yes
4 Global Charity Fund	X		X	X		X			Yes	No
5 Hope Springs Eternal Foundation	X	X	X	X		X		X	Yes	No
6 Howe Sound Samaritans Foundation	X	X	X					X	Yes	No
7 Imladris Foundation	X		X						Yes	No
8 Mighty Oaks Foundation	X					X			Yes	No
9 Revelation Foundation	X			X	X	X			Yes	No
10 Stewards Charitable Foundation	X		X			X			Yes	No
11 Theanon Foundation	X		X			X			Yes	No
12 Timothy Foundation	X		X		X			X	Yes	No
13 Homestead on the Hill Foundation		X			X			X	Yes	No
14 Maple Syrup Mafia Foundation		X							Yes	No
15 Inspiration Foundation		X					X		Yes	No
16 Delicate Balance Foundation			X		X		X		Yes	No
17 Foundation for Public Good				X	X		X		Yes	No
18 Headwaters Foundation			X			X		X	Yes	No
19 Paraklesis Foundation			X	X					Yes	No
20 Vanchorverve Foundation			X			X	X		Yes	No
21 Viva Voce Foundation			X					X	Yes	No
22 Eden Glen Foundation				X	X		X	X	Yes	No
23 Global View Foundation				X	X	X			Yes	No
24 Play Better Foundation				X				X	Yes	No
25 Zawadi Foundation				X	X				Yes	No

Why This Matters: \$600 Million Tax-Received Donations

The charities referred to here report more than \$600 million in tax-receipted donations. Since 2010: \$242 million.

Tax-Received
Donations
\$600 Million



Registered charities can issue official receipts for donations for income tax deductions. These receipts allow the donor to receive a tax credit for part of the donation. When this privilege is abused, government loses potential revenue.

Main sources of cash and non-cash gifts to the charities that fund Chimp are Stewart Blusson and his diamond mining business. More information in Appendix B.

Quest University, Fortius Sport & Health Training Centre

Blake Bromley and his company, Benefic Group Inc. have been involved with Fortius Sport & Health Centre in Burnaby as well as Quest University in Squamish, B.C.

Bromley charities have also granted millions of dollars to other charities, especially faith-based organizations.

But on the whole it appears that the charitable activity funded by the Bromley charities falls far short of the \$600 million in tax-receipted revenue that has been reported by Bromley charities.



Fortius Sport & Health Centre, Burnaby, B.C.



Quest University, Squamish, B.C.

Father & Son

Based in Vancouver, Chimp is a registered charity with designation as a public foundation. Blake Bromley, one of Chimp's original directors, has registered over 650 charities and planned/executed over \$2 BILLION worth of charitable giving, he says.

Our Founder

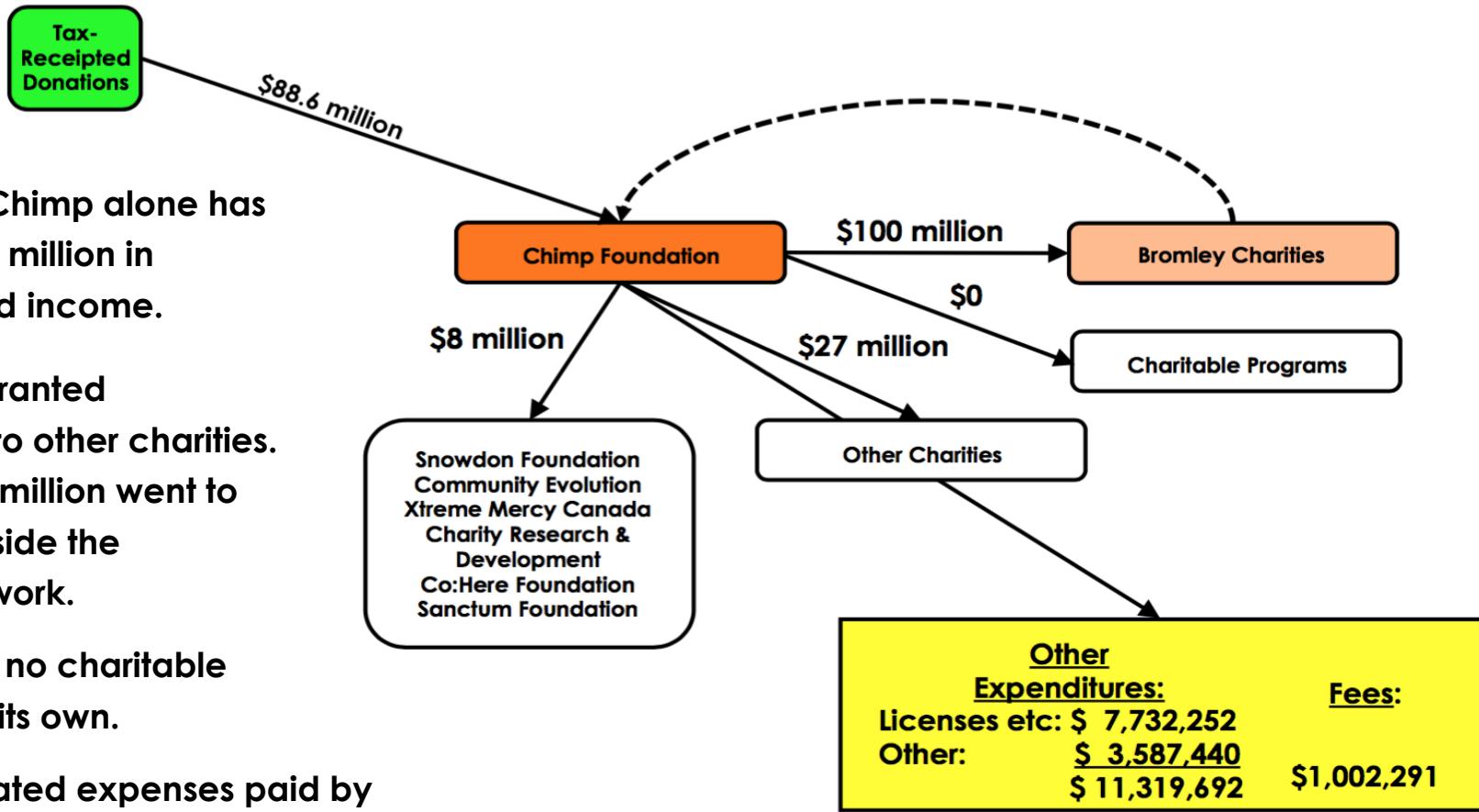
John Bromley grew up with charity at the core of his family's values. He took his professional background in corporate finance and co-founded [Benefic Group](#) with his father, Blake Bromley, one of the world's foremost experts in charity law, and the recognized pioneer of charitable law and gifting in Canada.

Blake works with donors, charities, foundations and governments on legal, financial and strategic issues, and has incorporated and registered over [650 charities](#) and planned/executed over [\\$2 Billion](#) worth of giving.

After developing an in-depth understanding of the complex world underpinning the charity sector, John went on to launch Charity Express and Peer Giving prior to founding CHIMP. Now he spends his time shaping the way people discover, access and participate in charity via web-based, cost effective and scalable platforms.



Chimp Foundation



Since 2011, Chimp alone has reported \$88 million in tax-receipted income.

Chimp has granted \$135 million to other charities. At most, \$35 million went to charities outside the Bromley network.

Chimp funds no charitable programs of its own.

Fees and related expenses paid by Chimp (2011-2017): \$12.3 million.

\$30.4 Million

Chimp's largest gift to any organization was \$30.4 million. This one grant to Zawadi Foundation, a Bromley charity, accounted for more than half of Chimp's grantmaking in 2016. The next year, Zawadi gave the same amount to Revelation Foundation.

Qualified donee #1817

Name of organization: Zawadi Foundation

Associated charity: No

Business number/Registration number: 845641893 RR 0001

City: Vancouver

Province/Territory: BC

Amount of gifts in kind: \$ 0

Total amount of gifts: \$ 30,475,000

Source Chimp's 2016 tax return:

<http://www.cra-arc.gc.ca/ebci/haip/srch/t3010form23gifts-eng.action?b=845528827RR0001&fpe=2016-07-31&n=CHIMP%3A+CHARITABLE+IMPACT+FOUNDATION+%28CANADA%29&p=73>

As shown at the right, the amount of Zawadi's gift to Revelation Foundation is reported *incorrectly* in on-line tax returns. Four cases of similar errors are shown ahead.

Qualified donees — Zawadi Foundation

3 Qualified donees

Qualified donee #1

Name of organization: Foundation for Public Good

Associated charity: No

Business number/Registration number: 852770601 RR 0001

City: Vancouver

Province/Territory: BC

Amount of gifts in kind: \$ 0

Total amount of gifts: \$ 110,000

Was any part of the gift intended for political activities? No

If yes, enter amount: \$ 0

Qualified donee #2

Name of organization: CHIMP Foundation

Associated charity: No

Business number/Registration number: 845528827 RR 0001

City: Vancouver

Province/Territory: BC

Amount of gifts in kind: \$ 0

Total amount of gifts: \$ 625,000

Was any part of the gift intended for political activities? No

If yes, enter amount: \$ 0

Qualified donee #3

Name of organization: Revelation Foundation

Associated charity: No

Business number/Registration number: 863561577 RR 0001

City: Vancouver

Province/Territory: BC

Amount of gifts in kind: \$ 30,475

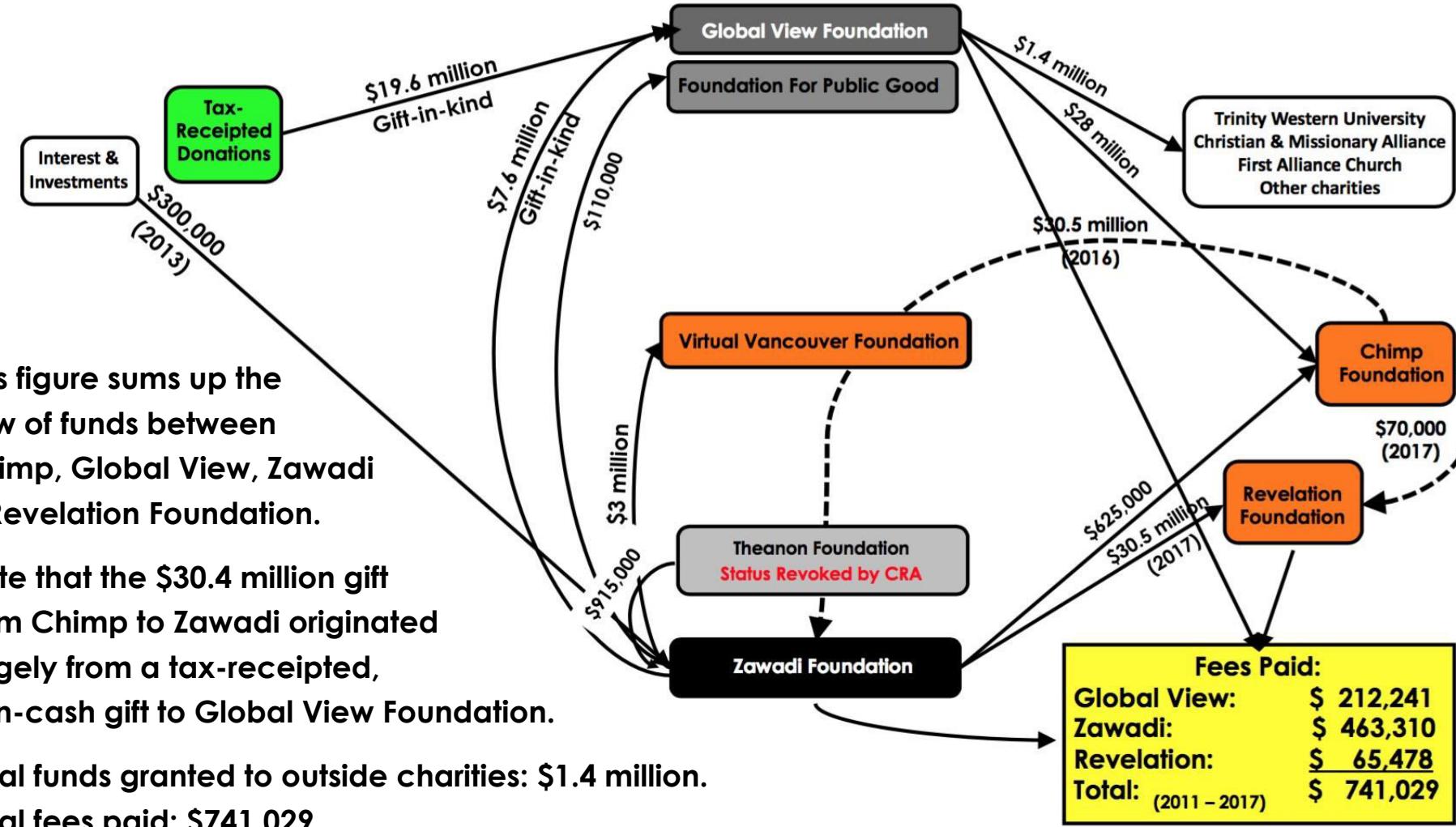
Total amount of gifts: \$ 30,475

Was any part of the gift intended for political activities? No

If yes, enter amount: \$ 0

ERROR:
\$30,475 should read
\$30,475,000

Global View, Zawadi & Revelation Foundation



Errors in On-Line Tax Returns

Mighty Oaks Foundation, 2014 \$7,000 should read \$7,000,000

Qualified donee #2

Name of organization: CHIMP (Charitable Impact) Foundation
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 7,000
Total amount of gifts \$ 7,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form23gifts-eng.action?b=867567315RR0001&fpe=2014-11-30&n=MIGHTY+OAKS+FOUNDATION>

Global Charity Fund, 2011 \$90,000 should read \$900,000

Qualified donee #1

Name of organization: Chimp Foundation
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts-in-kind: \$ 0
Total amount of gifts: \$ 90,000

Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form22gifts-eng.action?b=874459423RR0001&fpe=2011-11-30&n=GLOBAL+CHARITY+FUND>

QUC Residents Housing, 2014 \$1,100 should read \$1,100,000

Qualified donee #1

Name of organization: Pacific Light Foundation
Associated charity: No
Business number/Registration number: 845363498 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 1,100
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form23gifts-eng.action?b=832447254RR0001&fpe=2014-08-31&n=QUC+Residents+Housing+Foundation>

Almoner Foundation, 2016 \$900 should read \$900,000

Qualified donee #1

Name of organization: CHIMP: Charitable Impact Foundation
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 900
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form23gifts-eng.action?b=854728300RR0001&fpe=2016-03-31>

32 Public Foundations: Same Purpose, Same Address

Like Chimp, at least 32 of the Bromley charities are public foundations with exactly the same purpose: “gifting funds to qualified donees.”

Why so many public foundations run by the *same group of people* doing exactly the same thing at the same address?

Why doesn't Chimp fund charity directly rather than indirectly through all these public foundations?

	Name	Designation	Ongoing Programs	Same Address As Chimp?
1	4 What Matters Foundation	Public Foundation	Gifts to Qualified Donees	Yes
2	A Cappella Foundation	Public Foundation	Gifts to Qualified Donees	Yes
3	Almoner Foundation	Public Foundation	Gifts to Qualified Donees	Yes
4	BeCause Foundation	Public Foundation	Gifts to Qualified Donees	Yes
5	Benefic Foundation	Public Foundation	Gifts to Qualified Donees	Yes
6	Beneflick Foundation	Public Foundation	Gifts to Qualified Donees	Yes
7	Chimp Foundation	Public Foundation	Gifts to Qualified Donees	Yes
8	Cinefic Foundation	Public Foundation	Gifts to Qualified Donees	Yes
9	Data Foundation	Public Foundation	Gifts to Qualified Donees	Yes
10	Foundation for Public Good	Public Foundation	Gifts to Qualified Donees	Yes
11	Global Charity Fund	Public Foundation	Gifts to Qualified Donees	Yes
12	Global View Foundation	Public Foundation	Gifts to Qualified Donees	Yes
13	Headwaters Foundation	Public Foundation	Gifts to Qualified Donees	Yes
14	Homestead on the Hill Foundation	Public Foundation	Gifts to Qualified Donees	Yes
15	Hope Springs Eternal Foundation	Public Foundation	Gifts to Qualified Donees	Yes
16	Inspiration Foundation	Public Foundation	Gifts to Qualified Donees	Yes
17	Maple Syrup Mafia Foundation	Public Foundation	Gifts to Qualified Donees	Yes
18	Mighty Oaks Foundation	Public Foundation	Gifts to Qualified Donees	Yes
19	Pacific Light Foundation	Public Foundation	Gifts to Qualified Donees	Yes
20	Paraklesis Foundation	Public Foundation	Gifts to Qualified Donees	Yes
21	Planted Community Foundation	Public Foundation	Gifts to Qualified Donees	Yes
22	Play Better Foundation	Public Foundation	Gifts to Qualified Donees	Yes
23	Real Champions Foundation	Public Foundation	Gifts to Qualified Donees	Yes
24	Revelation Foundation	Public Foundation	Gifts to Qualified Donees	Yes
25	Ridgeline Foundation	Public Foundation	Gifts to Qualified Donees	Yes
26	Steadfast Foundation	Public Foundation	Gifts to Qualified Donees	Yes
27	Steward's Charitable Foundation	Public Foundation	Gifts to Qualified Donees	Yes
28	Theanon Foundation	Public Foundation	Gifts to Qualified Donees	Yes
29	Timothy Foundation	Public Foundation	Gifts to Qualified Donees	Yes
30	Vanchorverve Foundation	Public Foundation	Gifts to Qualified Donees	Yes
31	Virtual Vancouver Foundation	Public Foundation	Gifts to Qualified Donees	Yes
32	Zawadi Foundation	Public Foundation	Gifts to Qualified Donees	Yes

Source: Compiled from Canadian tax returns.

15 Charities: No Assets, No Revenue, No Activity

At least 15 of the Bromley charities appear to be shell charities that have yet to be activated. These charities have had no assets, no revenue, no expenditures, no financial activity whatsoever:

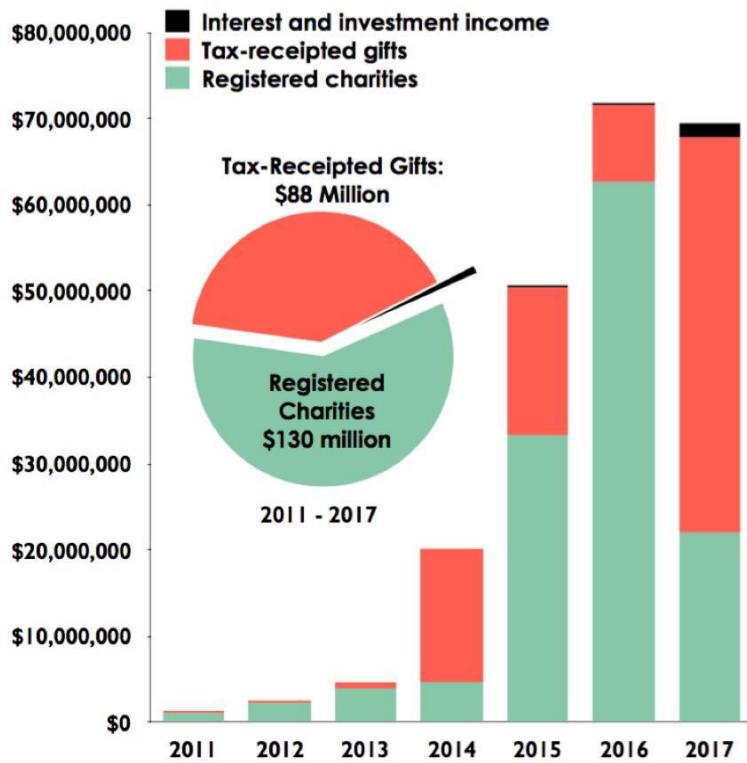
1. **Aqua Vitae Charitable Foundation**
2. **Aurora Foundation**
3. **BeCause Foundation**
4. **Beneflick Foundation**
5. **Champ Foundation**
6. **Cinefic Foundation**
7. **Data Foundation**
8. **Eventide Foundation**
9. **Inspiration Foundation**
10. **Reflection Foundation**
11. **Ridgeline Foundation**
12. **Rise & Shine Foundation**
13. **Ron Roadburg Foundation**
14. **Steadfast Foundation**
15. **Revelation Foundation** – received \$30.4 million in 2017, first revenue in 12 years.

How is Blake Bromley able to register so many charities that are inactive for many consecutive years?

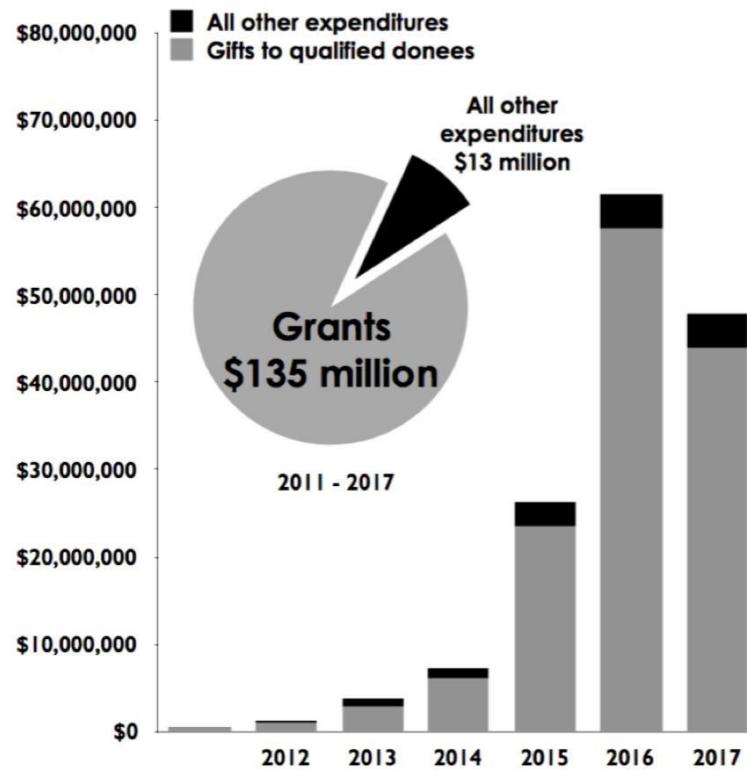
100-Fold Increases

Chimp's total revenue and expenditures have increased by more than *100-fold* over a few years. Within the charitable sector, this is highly unusual.

Chimp Revenue



Chimp Expenditures



Chimp On-line

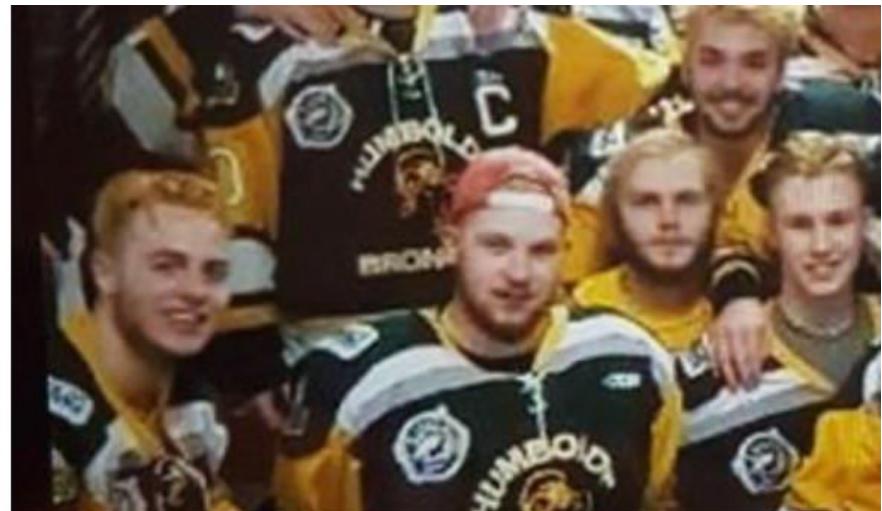
Chimp claims that "more than 100,000 Canadians" have used its services.* For an organization with such a large following, Chimp's on-line community is small:

- Instagram: 1,447 followers
- Twitter: 4,244 followers

During 2018, most of Chimp's Facebook posts received less than ten "likes" and almost no comments.

Chimp's Facebook post on fundraising for the Humboldt Broncos got ZERO "likes."

Why so little on-line activity from an organization that supposedly has a community of 100,000?



CA.GOFUNDME.COM

Click here to support Funds for Humboldt by Sylvie Kellington

 Like

 Comment

* Sources: @wearechimp and <https://www.instagram.com/wearechimp/> as of September 30, 2018.

** Source: Letter from Chimp Foundation, May 9, 2018.

*** Sources: <https://www.instagram.com/wearechimp/> and <https://twitter.com/wearechimp>

Blake Bromley: “International Bumblebee of the Charity World”

Blake Bromley travels extensively and is active in international philanthropy. He has referred to himself as a “bumblebee,” “cross-pollinating” the charitable world. His tweets diarize his many trips in China & the Middle East.

Lord Phillips of Sudbury refers to his friend Blake as the **international bumblebee of the charity world**, because he ceaselessly travels the globe learning and then cross-pollinating his accumulated knowledge with others. Blake is committed to advancing understanding of charity and the benevolent sector by **writing articles and lecturing widely** on legal issues, tax issues, and global and domestic trends. Read more about Blake's work as an **advisor to nations**.



Blake Bromley @blakebromley · 14 Feb 2014

Went to Qatar and England last month. Heading to Germany, Switzerland, Singapore, Laos, Vietnam and **China** now on 2 week Round-the-World



Blake Bromley @blakebromley · 20 May 2010

Gorgeous carpet wild bluebells provides beautiful setting for discussing esoteric complex issues of charity law with his **bumblebee** friend

Blake Bromley in China



Blake Bromley @blakebromley · 30 Sep 2014

So many used 2 entry **China** visa in my passport I now give immigration page # to save time
rummaging for current visa



Blake Bromley @blakebromley · 15 Jun 2011

Spoke at Offshore Investment Shanghai conference. Impressive attendees from Europe USA
as well as **China**. Made great new contacts



Blake Bromley @blakebromley · 20 Feb 2011

Presented elegant engraved watch by Ministry of Civil Affairs for my work on **China** charity
law



Blake Bromley @blakebromley · 30 Jun 2010

China could not invite me as foreigner to charity law mtg so called me "invited domestic
expert" - and British Council is paying. I love it.



Blake Bromley @blakebromley · 24 Nov 2010

Shanghai departure slow as immigration officer tried to identify which of ten
double visas I used entering China. Time for new passport!

Blake Bromley in Iraq



Blake Bromley @blakebromley · 23 Jan 2011

Getting visa a zoo - placating multiple officials as to why I was in **Iraq** until one senior official who expected me waived his magic wand



Blake Bromley @blakebromley · 27 Jan 2011

Met Ayatollah Sheik Mohammed Saeed Al Hakeem, **Iraq's** 2nd highest religious authority at his humble home Najaf to discuss charity



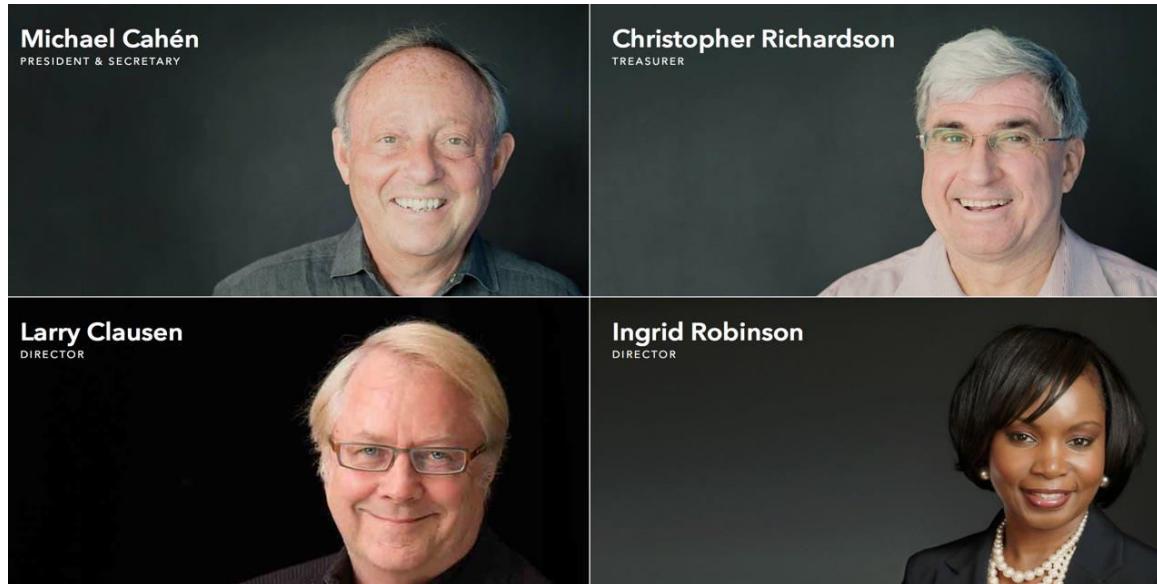
Blake Bromley @blakebromley · 28 Jan 2011

Met Grand Ayatollah Sheikh Basheer Hussain Najafy 4th of 4 Grand Ayatollahs in **Iraq** at his home under high security, no cameras phones, pens

Christopher Richardson, Treasurer

Until April of 2018, Chimp's treasurer was Christopher Richardson, according to Chimp's web-site.
As of July of 2018, Christopher Richardson is no longer listed as Chimp's treasurer.

As of April 2018



As of July 2018



Christopher Richardson, Running for School Board

Christopher Richardson is a former chairperson of the Vancouver School Board. He stepped down in June of 2015, citing personal reasons. Richardson ran for re-election in Vancouver's 2018 municipal elections. Christopher Richardson is or has been involved in at least 40 Bromley charities. See next page.

CBCnews | British Columbia

Vancouver School Board chair Christopher Richardson resigns suddenly for personal reasons

Richardson cites 'deeply personal' reasons for stepping down
CBC News Posted: Jun 16, 2015 7:13 AM PT | Last Updated: Jun 16, 2015 7:47 AM PT

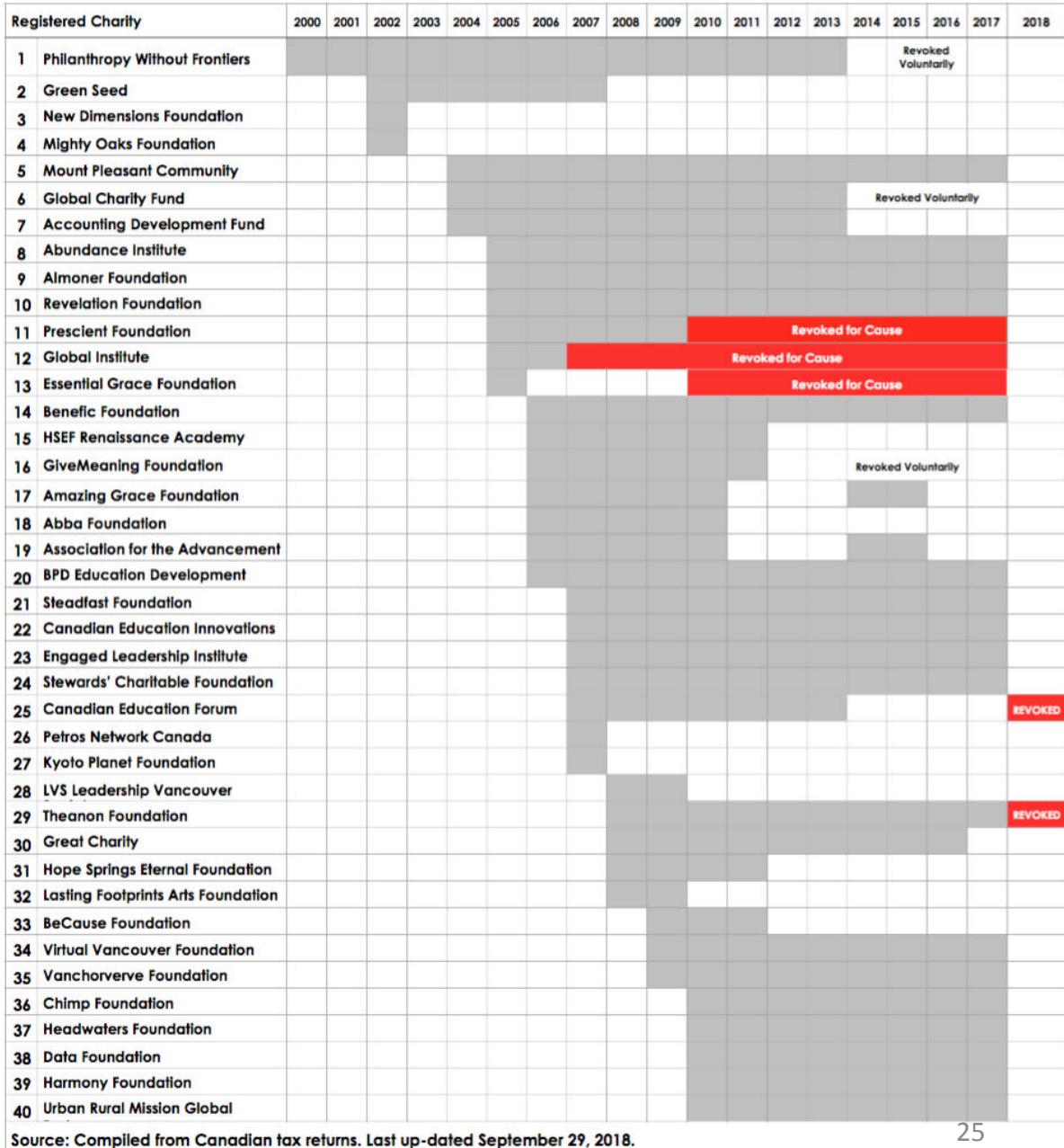


Chair of the Vancouver School Board, Christopher Richardson, is closed-lipped about why he is stepping down early. (CBC)



40 Bromley charities where Christopher Richardson is or has been a director.

At least 5 of these charities have had their charitable status revoked by the CRA.



Source: Compiled from Canadian tax returns. Last up-dated September 29, 2018.

Chimp says that it “*started very quietly in 2011*”

Chimp advertises that it began in 2011 (shown below) but actually, it began in 2008, tax returns say.

The Idea Behind Chimp

With over 85,000 charities in Canada, being charitable can get complicated for those who want to make a difference. The idea behind Chimp is to simplify the giving process, so that you can do all your giving on your own terms and in one place.

Chimp started very quietly in 2011, with the idea that everyone should have access to tools to easily integrate giving into their everyday lives. So we set out to give everyone their own free foundation, along with a toolset that allowed them to give to and fundraise for any registered charity in Canada, on their own or with friends, family and social networks. We went to market with these tools in early 2014.

Partnerships with organizations like Bell, Hootsuite, Earls, TOMS, Lululemon and the Whitecaps FC, and charities like Big Brothers, Arts Umbrella and Peace Geeks have helped us give people the tools to be charitable on their own terms.



Actually, Chimp was registered in 2008

On the same day that Chimp was registered, at least three other charities were also registered. All four charities have a common director, Alex Salas-Sanchez, who is an accountant/book keeper and employee of Blake Bromley's company, Benefic Group Inc.

CHIMP: CHARITABLE IMPACT FOUNDATION (CANADA)

▼ Basic information sheet

Designation:	Public foundation
Fiscal Period End:	2016-07-31
Registration Date:	2008-08-26

Global View Foundation

▼ Basic information sheet

Designation:	Public foundation
Fiscal Period End:	2016-07-31
Registration Date:	2008-08-26

Pacific Light Foundation

▼ Basic information sheet

Designation:	Public foundation
Fiscal Period End:	2014-07-31
Registration Date:	2008-08-26

Zawadi Foundation

▼ Basic information sheet

Designation:	Public foundation
Fiscal Period End:	2016-07-31
Registration Date:	2008-08-26

Four Charities: Same Day, Same Directors

Chimp registered in 2008 with Blake Bromley, John Glazema & Alexander Salas-Sanchez as directors.

Directors/trustees and like officials —

CHIMP: CHARITABLE IMPACT FOUNDATION (CANADA)

3 Directors/trustees and like officials

Registered charities that notice problems with their online info
the return.

Director/trustee and like official #1

Full name: **Alexander Salas-Sanchez**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #2

Full name: **Blake Bromley**

Director/trustee/like officials term:

Start Date: 2008-11-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #3

Full name: **John Glazema**

Director/trustee/like officials term:

Start Date: 2008-11-06

Directors/trustees and like officials Zawadi Foundation

3 Directors/trustees and like officials

Registered charities that notice problems with their online information should
amend the return.

Director/trustee and like official #1

Full name: **Alexander Salas-Sanchez**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #2

Full name: **Karim Mayan**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #3

Full name: **Andrew Gay**

Director/trustee/like officials term:

Start Date: 2008-08-06

Directors/trustees and like officials Pacific Light Foundation

3 Directors/trustees and like officials

Registered charities that notice problems with their online information should
amend the return.

Director/trustee and like official #1

Full name: **Karim Mayan**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #2

Full name: **Alexander Salas-Sanchez**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #3

Full name: **Andrew A L Gay**

Director/trustee/like officials term:

Start Date: 2008-08-06

Directors/trustees and like officials Global View Foundation

3 Directors/trustees and like officials

Registered charities that notice problems with their online information should
amend the return.

Director/trustee and like official #1

Full name: **Alexander Salas-Sanchez**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #2

Full name: **Karim Mayan**

Director/trustee/like officials term:

Start Date: 2008-08-06

End Date:

Position: Director

At arm's length with other Directors, etc.?:

Director/trustee and like official #3

Full name: **Andrew Gay**

Director/trustee/like officials term:

Start Date: 2008-08-06

\$72 Million From One Charity To The Next

Between 2013 and 2016, the four charities (Chimp, Global View, Zawadi & Pacific Light) granted \$72 million between themselves. These grants accounted for 96% of the total granted by Global View, Zawadi and Pacific Light. Evidently, most of their grantmaking over a five-year period consisted simply of transferring funds back and forth with each other, and to Chimp.

Donor	Recipient	2011	2012	2013	2014	2015	2016	2017	2012 - 2017
Chimp	Global View						\$3,619,975		
	Zawadi				\$84,149	\$20,000	\$30,475,000		\$34,536,404
	Pacific Light			\$148,220	\$189,060				
Global View	Chimp						\$28,037,500		\$28,037,500
Zawadi	Global View				\$7,600,000				
	Chimp							\$625,000	\$38,700,000
	Revelation Foundation							\$30,475,000	
Pacific Light	Chimp				\$2,600,000				\$2,600,000
Total:		\$0	\$0	\$148,220	\$10,473,209	\$20,000	\$62,132,475	\$31,100,000	\$103,873,904

Source: Compiled from Canadian tax returns as of August 10, 2018.

Bromley Grantmaking

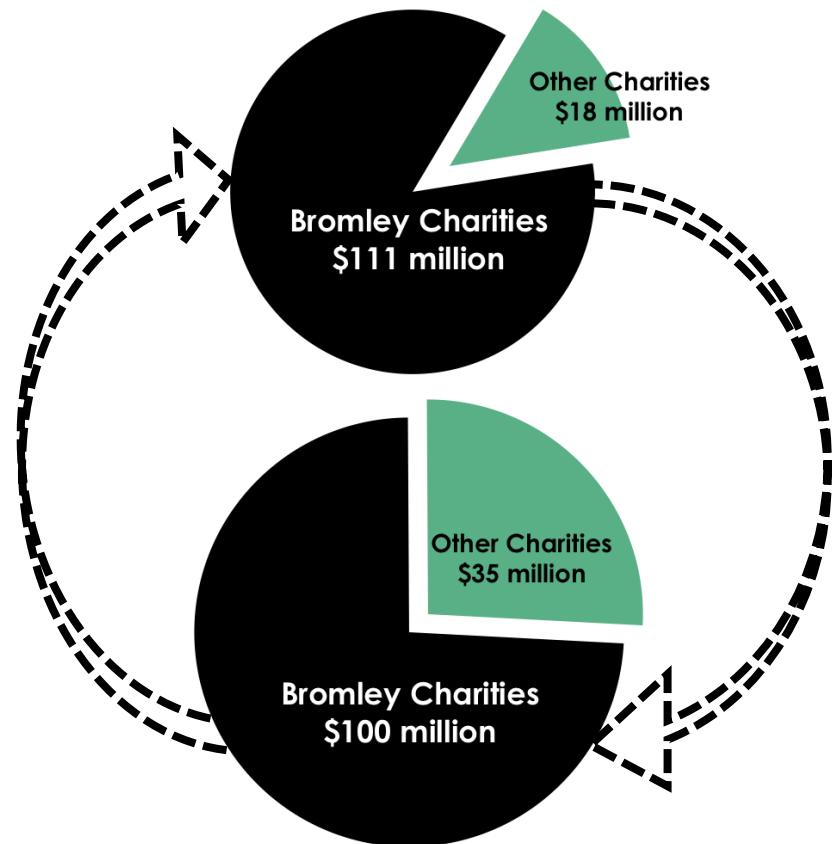
Over the years since it began, Chimp has continued to engage in circular grant-making.

Of the \$129 million that Chimp has received from other charities since 2011, at least \$111 million is from Bromley charities.

Likewise, of the \$135 million that Chimp has gifted to other charities, at least \$100 million has been gifted to Bromley charities.

As it appears, \$100 million seems to just go in circles, granted back and forth between charities that are run mostly by the same group of people, out of the same office as Chimp.

Chimp Revenue *from* Registered Charities



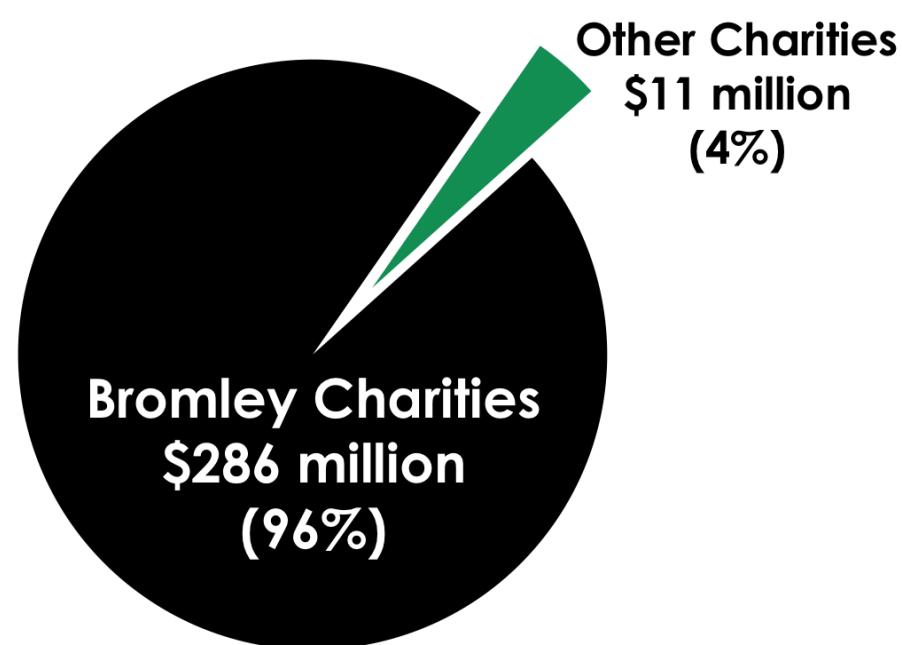
Chimp Expenditures:
Grantmaking *to* Registered Charities
2011-2017

Predominant Purpose

Over the same years that Chimp received \$111 million from other Bromley charities, the total number of gifts made by 32 Bromley charities was 210 gifts for the sum of \$297 million. At most, \$11 million (only 4%) went outside the Bromley network.

Over the same years that Bromley charities gifted \$110 million into Chimp, they gifted only \$11 million to all outside charities combined, *one tenth as much as they funneled into Chimp*. This suggests that the main activity of the Bromley charities is to transfer money amongst themselves and into Chimp. Furthermore, this raises questions about the predominant purpose of Chimp and other Bromley charities: Is this activity *exclusively charitable, as required by law?*

What charitable purpose does this serve?



Ten Recipients: \$33 Million (2017)

In 2017, Chimp reported nearly 2,400 gifts for a total of nearly \$44 million.

Ten gifts (0.4%) totaled \$33 million, accounting for 75% of the total funds that Chimp granted in 2017.

At least six of the top 10 recipients of funds from Chimp are Bromley charities.

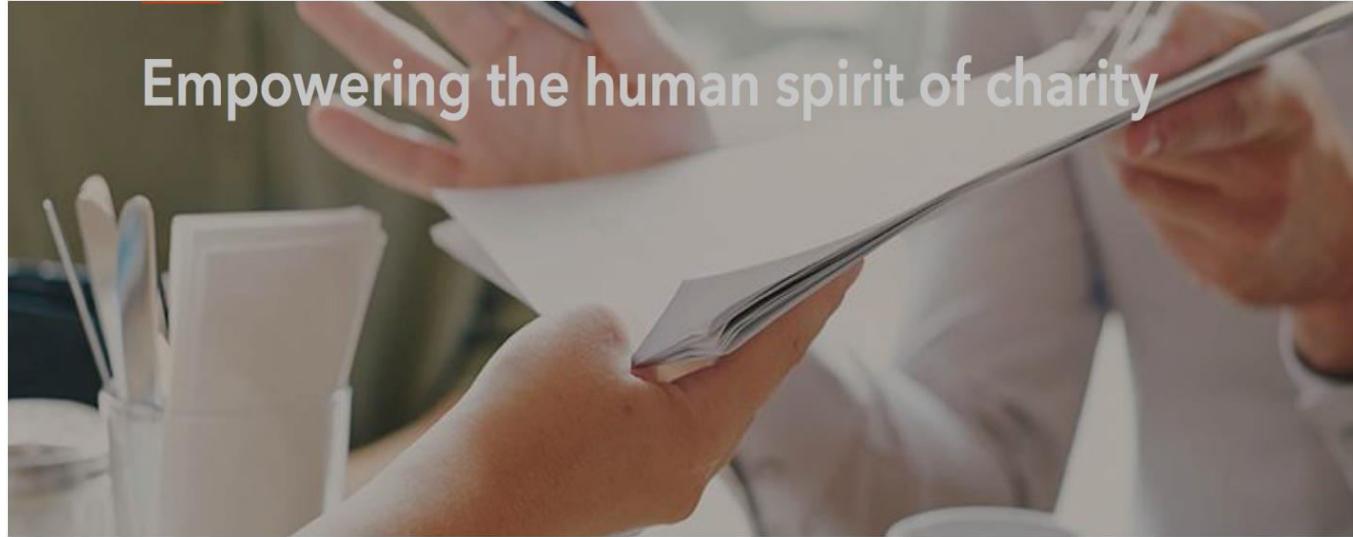
Canadian Education Forum, which received \$500,000, was shut down by CRA in May, 2018.¹

Top Ten Gifts From Chimp Foundation (2017)			
	Recipient Organization	Affiliated Charity?	Amount
1	Viva Voce Charitable Foundation	Yes	\$14,614,210
2	A Cappella Foundation	Yes	\$4,349,975
3	Snowdon Foundation	???	\$4,182,931
4	Foundation For Public Good	Yes	\$3,319,985
5	Virtual Vancouver Foundation	Yes	\$3,074,999
6	Stewards' Charitable Foundation	Yes	\$1,000,000
7	Mulgrave Independent School Society	No	\$1,000,000
8	Youth With A Mission B.C. Society	No	\$542,333
9	Youth With A Mission Foundation	No	\$516,805
10	Canadian Education Forum	Yes	\$500,000
TOTAL:			\$33,101,238

¹ Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/revcausesumm-eng.action?&bn=891072092RR0001>

Growing “The Culture of Charity in Canada”

Chimp exists to empower the human spirit of charity and grow the culture of charity in Canada, it says.



Charitable Impact Foundation is a registered charity – or more specifically, a public foundation.

It operates as a Donor Advised Fund, and exists to facilitate gifts to other registered charities (referred to as “qualified donees”) and to
grow the culture of charity in Canada.

“Empowering the Human Spirit”



U.S. Tax Returns

As of 2014, Chimp is also a U.S. charity and files tax returns with the I.R.S. If Chimp aims to grow the culture of charity in Canada,

why operate in the U.S.?

None of the U.S. funders of activism in Canada appear to be involved with Bromley charities. Of interest, however, is that nearly 20 years ago when U.S. funding of activism in Canada was scaling up, Blake Bromley had meetings with Rockefeller Brothers Fund in New York.

In general, Bromley charities report very little funding from outside Canada and are not big funders of environmental activism. Gifts from Bromley charities to faith-based organizations are, in general, much larger than gifts to environmental charities.

As Filed Data -		DLN: 93492284007747																																																			
Short Form Return of Organization Exempt From Income Tax <small>Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)</small>																																																					
Form 990-EZ <small>Department of the Treasury Internal Revenue Service</small>		2016																																																			
► Do not enter social security numbers on this form as it may be made public. ► Information about Form 990-EZ and its instructions is at www.irs.gov/form990 .																																																					
A For the 2016 calendar year, or tax year beginning 01-01-2016 , and ending 12-31-2016 B Check if applicable <input type="checkbox"/> Address change <input type="checkbox"/> Name change <input type="checkbox"/> Initial return <input type="checkbox"/> Final return/terminated <input type="checkbox"/> Amended return <input type="checkbox"/> Application pending		D Employer identification number 46-1259161 E Telephone number (604) 633-9652 F Group Exemption Number ►																																																			
G Accounting Method <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Accrual Other (specify) ► _____		H Check ► <input type="checkbox"/> if the organization is not required to attach Schedule B (Form 990, 990-EZ, or 990-PF)																																																			
I Website: ► N/A J Tax-exempt status (check only one) - <input checked="" type="checkbox"/> 501(c)(3) <input type="checkbox"/> 501(c)() <input type="checkbox"/> 4947(a)(1) or <input type="checkbox"/> 527																																																					
K Form of organization <input type="checkbox"/> Corporation <input type="checkbox"/> Trust <input type="checkbox"/> Association Other <small>L Add lines 5b, 6c, and 7b to line 9 to determine gross receipts If gross receipts are \$200,000 or more, or if total assets (Part II, column (B) below) are \$500,000 or more, file Form 990 instead of Form 990-EZ ► \$ 114,940</small>																																																					
Part I Revenue, Expenses, and Changes in Net Assets or Fund Balances (see the instructions for Part I) <small>Check if the organization used Schedule O to respond to any question in this Part I</small>																																																					
Revenue	<table border="1"> <tbody> <tr><td>1 Contributions, gifts, grants, and similar amounts received</td><td style="text-align: right;">1</td><td style="text-align: right;">114,940</td></tr> <tr><td>2 Program service revenue including government fees and contracts</td><td style="text-align: right;">2</td><td></td></tr> <tr><td>3 Membership dues and assessments</td><td style="text-align: right;">3</td><td></td></tr> <tr><td>4 Investment income</td><td style="text-align: right;">4</td><td></td></tr> <tr><td>5a Gross amount from sale of assets other than inventory</td><td style="text-align: right;">5a</td><td></td></tr> <tr><td>b Less cost or other basis and sales expenses</td><td style="text-align: right;">5b</td><td></td></tr> <tr><td>c Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a)</td><td style="text-align: right;">5c</td><td></td></tr> <tr><td>6 Gaming and fundraising events</td><td></td><td></td></tr> <tr><td>a Gross income from gaming (attach Schedule G if greater than \$15,000)</td><td style="text-align: right;">6a</td><td></td></tr> <tr><td>b Gross income from fundraising events (not including \$ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000)</td><td style="text-align: right;">6b</td><td></td></tr> <tr><td>c Less direct expenses from gaming and fundraising events</td><td style="text-align: right;">6c</td><td></td></tr> <tr><td>d Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)</td><td></td><td></td></tr> <tr><td>7a Gross sales of inventory, less returns and allowances</td><td style="text-align: right;">7a</td><td></td></tr> <tr><td>b Less cost of goods sold</td><td style="text-align: right;">7b</td><td></td></tr> <tr><td>c Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a)</td><td></td><td></td></tr> <tr><td>8 Other revenue (describe in Schedule O)</td><td></td><td></td></tr> <tr><td>9 Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8 ►</td><td style="text-align: right;">9</td><td style="text-align: right;">114,940</td></tr> </tbody> </table>		1 Contributions, gifts, grants, and similar amounts received	1	114,940	2 Program service revenue including government fees and contracts	2		3 Membership dues and assessments	3		4 Investment income	4		5a Gross amount from sale of assets other than inventory	5a		b Less cost or other basis and sales expenses	5b		c Gain or (loss) from sale of assets other than inventory (Subtract line 5b from line 5a)	5c		6 Gaming and fundraising events			a Gross income from gaming (attach Schedule G if greater than \$15,000)	6a		b Gross income from fundraising events (not including \$ of contributions from fundraising events reported on line 1) (attach Schedule G if the sum of such gross income and contributions exceeds \$15,000)	6b		c Less direct expenses from gaming and fundraising events	6c		d Net income or (loss) from gaming and fundraising events (add lines 6a and 6b and subtract line 6c)			7a Gross sales of inventory, less returns and allowances	7a		b Less cost of goods sold	7b		c Gross profit or (loss) from sales of inventory (Subtract line 7b from line 7a)			8 Other revenue (describe in Schedule O)			9 Total revenue. Add lines 1, 2, 3, 4, 5c, 6d, 7c, and 8 ►	9	114,940
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<small>For Paperwork Reduction Act Notice, see the separate instructions.</small>																																																					
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Form 990-EZ (2016)																																																					

Meetings with Rockefeller Brothers Fund & U.S. Foundations

As shown below, back in 2001 and 2002, Blake Bromley met in New York with the Rockefeller Brothers Fund and other U.S. funders of activism in Canada, according to information contained in the Canadian tax returns of Philanthropy Without Frontiers, a Bromley charity.

2001*

MET WITH VARIOUS PEOPLE INVOLVED IN CHARITABLE SECTOR IN PRAGUE CONSULTED WITH CHARITY COMMISSION IN LONDON MET WITH OFFICIAL OF ASIA DEVELOPMENT BANK HEAD OF NGO GOVT DEPT AND SPOKE AT ASIA SOCIETY MEERTING IN PHILIPPINES FOLLOW UP MEETINGS IN SOUTH AFRICA WITH CHARITY SECTOR ATTENDED CONFERENCE IN DUBLIN AND PRESENTED A PAPER ON PEMSEL MET WITH **ROCKERFELLER BROS FUND** AND FORD FDN IN NEW YORK METWITH CHARITIES DIVISION IN OTTAWA

2002**

BLAKE BROMLEY - DIRECTOR: ATTENDED AND PRESENTED PAPER AT "INTERNATIONAL NON-PROFIT PARTNERSHIP CONFERENCE IN JOHANNESBURY, SOUTH AFRICA. ATTENDED AND PRESENTED PAPER AT "QUEENSLAND UNIVERSITY CONFERENCE ON CHARITY LAW IN THE PACIFIC RIM". PERFORMED RESEARCH AT BRITISH LIBRARY AND ATTENDED AND PRESENTED PAPER AT THE CHARITY LAW CONFERENCE "400TH ANNIVERSARY OF THE STATUTE OF ELIZABETH". MEETINGS IN HANOI WITH MR. THAN, SENIOR GOVT OFFICIAL, CONCERNING DEVELOPMENT OF CHARITY LAWS IN VIETNAM. **ATTENDED PHILANTHROPY ROUNDTABLE MEETINGS IN CALIFORNIA**. CHRISTOPHER RICHARDSON - DIRECTOR...

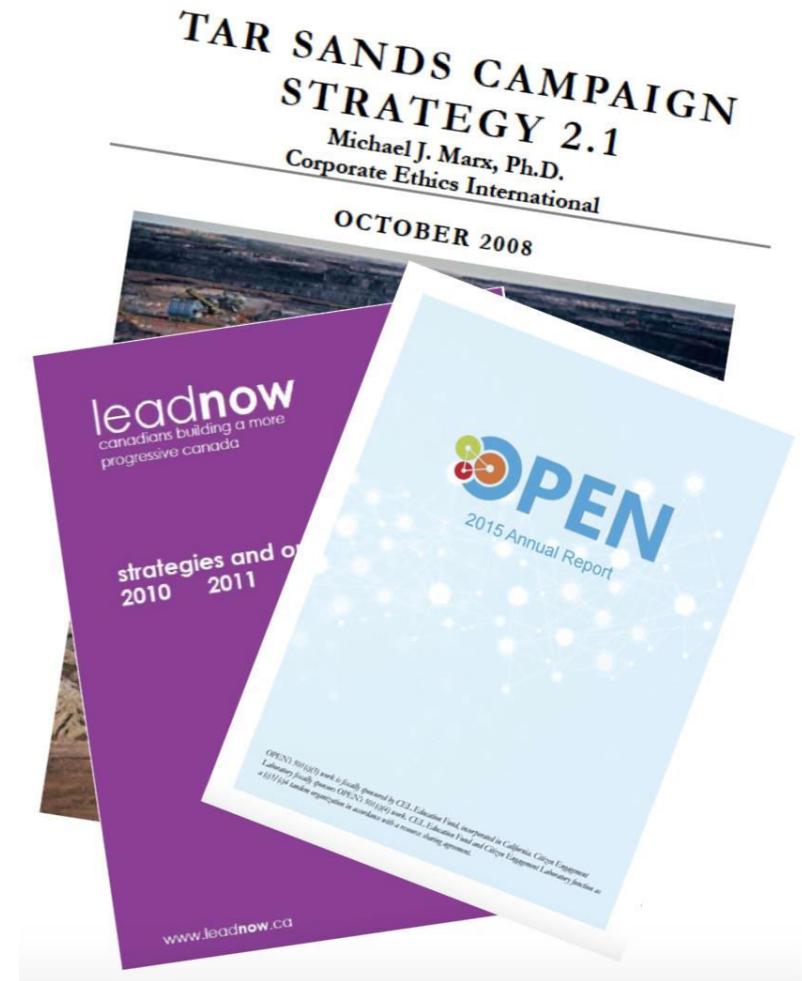
* <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form17-eng.action?b=137201315RR0001&fpe=2001-02-28&n=PHILANTHROPY+WITHOUT+FRONTIERS%2FPHILANTHROPIE+SANS+FRONTIERES>

** <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form17-eng.action?b=137201315RR0001&fpe=2002-02-28&n=PHILANTHROPY+WITHOUT+FRONTIERS%2FPHILANTHROPIE+SANS+FRONTIERES>

Rockefeller-Funded Activism in Canada

Since 2008, Rockefeller Brothers Fund has been funding The Tar Sands Campaign that explicitly aims to “land-lock” crude oil from western Canada, keeping it out of overseas markets where it could fetch a higher price per barrel.* The Tar Sands Campaign is coordinated by Tides Foundation (“Tides”) in San Francisco. Tides has paid out more than \$40 million to more than 100 organizations involved in this campaign.***

One of the organizations funded by Rockefeller Brothers Fund is OPEN, based in Oakland, CA.** As part of a “Strategic Incubation” Program, OPEN helped to create Leadnow, a Vancouver group that is active in municipal, provincial and federal elections. OPEN claims credit for “contributing greatly” to ousting the Conservative Party in the 2015 federal election.



* Source: <https://corpethics.org/the-tar-sands-campaign/>

** Source: <https://www.rbf.org/grantees/cel-education-fund>

*** Source: http://fairquestions.typepad.com/rethink_campaigns/tar-sands-campaign-400-payments.html

Chimp & Tides

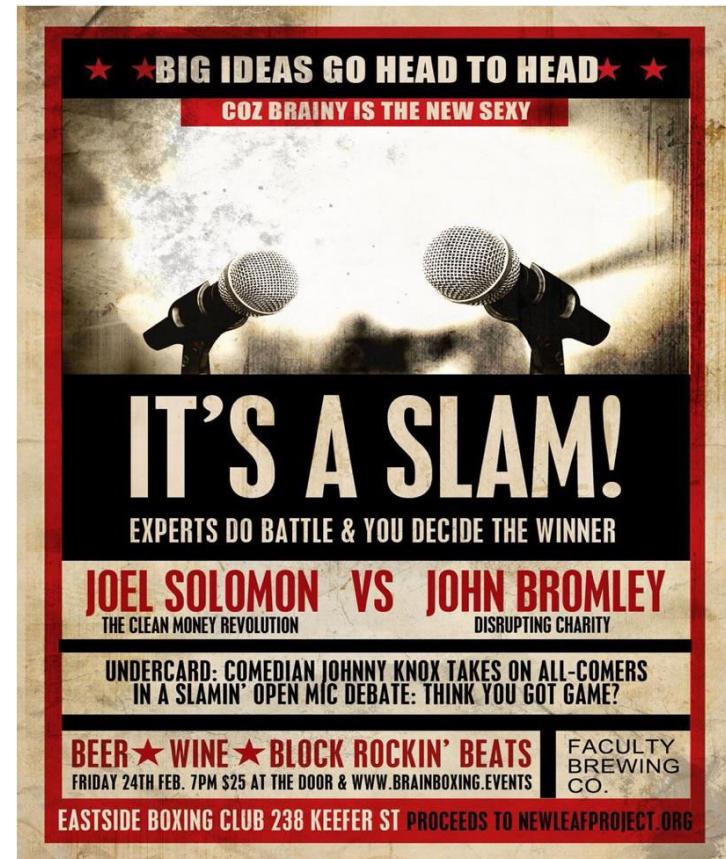


Christopher Richardson



Paul Richardson

Paul Richardson, brother of Christopher Richardson is CEO of Renewal Funds, an “investment firm” run by Joel Solomon. Mr. Solomon is a former chairperson of the board of Tides Foundation, based in San Francisco, and a former director of Tides Canada.



Joel Solomon & John Bromley held a debate, February 24, 2017.

Chimp & Tides (Cont'd)

Two organizations that have received small grants via Chimp are Tides Canada Foundation and Tides Canada Initiatives Society:

Qualified donee #1846

Name of organization: **Tides Canada Foundation**
Associated charity: No
Business number/Registration number: 868947797 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 7,016
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #547

Name of organization: **Tides Canada Initiatives Society**
Associated charity:
Business number/Registration number: 130560188 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 5,733
Was any part of the gift intended for political activities?
If yes, enter amount: \$ 0

Chimp has also received relatively small grants from Tides Canada:

Qualified donee #46

Name of organization: **CHIMP: Charitable Impact Foundation (Canada)**
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ **54,359**
Was any part of the gift intended for political activities?
If yes, enter amount: \$ 0

2016

Qualified donee #137

Name of organization: **CHIMP: Charitable Impact Foundation (Canada)**
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts-in-kind: \$ 0
Total amount of gifts: \$ 7,475
Was any part of the gift intended for political activities?
If yes, enter amount: \$ 0

Blake Bromley: CRA Audits A “*Witch Hunt*”

Beginning in 2012, Tides Canada was at the centre of a series of CRA audits of the political activity of charities. Blake Bromley and others characterized these audits as a “witch hunt” and a scandal worthy of being called “Auditgate.”

At the time, there was little or no discussion in the media about the CRA audits of Bromley charities.



Blake Bromley

THE BLOG

CRA Can Call a Mulligan in "Auditgate" Process

12/06/2014 12:33 EST | Updated 02/04/2015 05:59 EST

The debate about how “tricky” it is for the Director-General of CRA’s Charity Directorate to consider political leanings when selecting charities for audits continues to rage in Canada. The outrage has reached the dreaded “gate” stage with respected opinion leaders asking “Why is this not considered Canada’s own Auditgate scandal?”

Bromley Charities Shut Down by CRA

CRA has revoked the charitable status of at least eight Bromley charities and at least 30 Bromley charities have voluntarily closed.*

In 2010, CRA revoked the charitable status of four Bromley charities for engaging in transactions that were “*circular in nature*” in order to sell a chicken farm on an unwarranted, tax-free basis, thereby avoiding capital gains taxes and dividend taxes.**

The charities did this by purchasing shares “in full knowledge” that the shares were to be de-valued to nil.

CRA found that these charities conferred substantial, unwarranted tax benefits to private individuals.



* Canadian Education Forum, Theanon Foundation, Essential Grace Foundation, Global Institute, Gateway Benevolent Foundation, Give2Asia Foundation, Malachi 3:10 Foundation, Prescient Foundation.

** Source: CRA Letter dated January 21, 2009. Page 6: https://www.globalphilanthropy.ca/images/uploads/Prescient_Foundation.pdf

“Lack of Due Diligence,” CRA Found

The directors of four Bromley charities failed to exercise due diligence, having been side-tracked by involvement in “*complex circular business transactions*,” CRA ruled.*

Due Diligence of Directors

We note with concern, with respect to the activities of Prescient and the safeguarding of assets, that the directors have demonstrated a lack of due diligence in this regard. In fact, it is our position that the duty of the directors to operate in the best interests of Prescient has been sidetracked by its involvement in complex circular business transactions that have put the assets of the charity at risk.

- CRA revoked Prescient Foundation, Essential Grace Foundation, Gateway Benevolent Foundation and Malachi 3:10 Foundation.
- Source: CRA Letter dated January 21, 2009. Page 6: https://www.globalphilanthropy.ca/images/uploads/Prescient_Foundation.pdf

Sham Transactions

Primary Position

 It is our position that the following transactions were shams and secondly that they had no legal substance and were legally ineffective:

- o The loan from PWF to Vision.
- o The termination of the purchase agreement between Vision and the Brandsmas.
- o The sale of Vision shares to the foundations.
- o The donation of assets by Vision to Theanon.
- o The sale of assets by Theanon to the Brandsmas.

Sham

 Based on the facts of the case, the CRA is of the position that transactions involving the Vision shares and assets were shams. A sham transaction is one in which acts committed or documents executed by the parties to the transaction are intended to give to third parties the appearance of creating between the parties legal rights and obligations different from the actual legal rights and obligations which the parties actually intended to create. In *Stubart Investments Ltd. v. HMQ*, (84 DTC 6305) Estey. J. of the Supreme Court of Canada stated:

A sham transaction: This expression comes to us from decisions in the United Kingdom, and it has been generally taken to mean (but not without ambiguity) a transaction conducted with an element of deceit so as to create an illusion calculated to lead the tax collector away from the taxpayer or the true nature of the transaction; or, simple deception whereby the taxpayer creates a facade of reality quite different from the disguised reality. The courts will not permit the taxpayer to take advantage of deductions or exemptions which are founded on a sham transaction.

Illegal Tax Planning Arrangements For A Participation Fee

CRA's revocation of Theanon Foundation took more than 10 years.

Some of the Theanon transactions that CRA found to be illegal date back to the early 2000's.

Summary of reasons for revocation — THEANON CHARITABLE FOUNDATION

It is our position that during the audit period, the Organization did not comply with the requirements set out in the Income Tax Act. In particular, it was found that the Organization failed to devote resources to charitable purposes by making gifts to non-qualified donees and providing undue benefits, carrying on an unrelated business issuing donation receipts that were not in accordance with the Act and/or its Regulations and failing to maintain adequate books and records. The audit found that the Organization participated in tax planning arrangements which were designed to confer undue benefits on the parties involved. In 2005, the Organization, along with three other charities, participated in two corporate farm sale arrangements where shares of the corporations were purchased for \$6.7 million. The corporations' assets, of equivalent value, were then donated to the Organization and the other participating charities who in turn issued official donation receipts. The corporations used the official donation receipts obtained to offset the capital gain taxes otherwise payable on the sale of their shares. Subsequent to the donations, the shares declined substantially in value leaving the Organization and the other charities with a minimal profit or participation fee. It is the position of the Canada Revenue Agency (CRA) that the transfers for which the official receipts were issued did not legally qualify as gifts and that the Organization operated for the non-charitable purpose of facilitating the tax planning arrangements for a participation fee.

² Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/revcausesumm-eng.action?&bn=891072092RR0001>

Voluntary Revocation Requested, Denied by CRA



Canada Revenue
Agency

Agence du revenu
du Canada

When Theanon Foundation was informed that CRA would revoke its status, the charity requested voluntary revocation instead. CRA refused, citing "the seriousness of the non-compliance."

[REDACTED]

SEP 15 2014

Attention: [REDACTED]

REGISTERED MAIL

BN: 89110 6841RR0001
File #: 0744540

Subject: Notice of Intention to Revoke
Theanon Charitable Foundation

Dear [REDACTED]:

I am writing further to our letter dated January 17, 2013 (copy enclosed), in which you were invited to submit representations as to why the registration of Theanon Charitable Foundation (the Organization) should not be revoked in accordance with subsection 168(1) of the *Income Tax Act* (the *Act*).

We have now reviewed and considered your written response dated March 15, 2013. However, notwithstanding your reply, our concerns with respect to the Organization's non-compliance with the requirements of the *Act* for registration as a charity have not been alleviated. Our position is fully described in Appendix "A".

Additionally, as per our letter of March 24, 2014, we have considered the Organization's request for voluntary revocation and we are not in a position to grant your request due to the seriousness of the non-compliance revealed during our audit.

30 Bromley Charities Voluntarily Closed

At least 30 Bromley charities have voluntarily revoked their charitable status. Whether any of these charities were in the midst of CRA audit at the time of their voluntarily revocation is an unanswered question.

- 1. 4 What Matters Foundation**
- 2. Arcadia Foundation**
- 3. Aurora Foundation**
- 4. Cahen Foundation**
- 5. Darcy Foundation**
- 6. Dodson Foundation**
- 7. Future Foundation**
- 8. Give2Asia Foundation**
- 9. GiveMeaning Foundation**
- 10. Glen Lamond Foundation**
- 11. Global Charity Fund**
- 12. Green Seed**
- 13. Herald Foundation**
- 14. Independent World Television Foundation**
- 15. Institute of Liberal Education**
- 16. Kasah Foundation of Hope**
- 17. Kyoto Planet Foundation**
- 18. Lasting Footprint Art Foundation**
- 19. Lodestar Foundation**
- 20. Morning Light Foundation**
- 21. New Dimensions Foundation**
- 22. Pacific Light Foundation**
- 23. Philanthropy Without Frontiers**
- 24. Real Champions Foundation**
- 25. Revelstoke Education Foundation**
- 26. RHL Foundation**
- 27. Seacrest Foundation**
- 28. Sentinel Foundation**
- 29. Springtail Foundation**
- 30. The Cahen Foundation**

Undue Benefits

Canadian Education Forum (CEF), another Bromley charity, lost its charitable status because it funded ineligible organizations and provided “undue benefits.”² Shown on the next page, CRA objected to \$128,499 that Canadian Education Forum spent on six events during 2010 and 2011. At the time, CEF had three directors: Blake Bromley, Christopher Richardson and a Benefic employee.

Summary of reasons for revocation — CANADIAN EDUCATION FORUM

The audit by the CRA has revealed that the Organization is not complying with the requirements set out in the Act. In particular, it was found that the Organization failed to devote resources to charitable activities carried on by the Organization itself by failing to maintain direction and control over resources, and by gifting to non-qualified donees; provided undue benefits; failed to maintain adequate books and records; and failed to file an information return as required by the Act. For all of these reasons, and for each reason alone, it is the position of the CRA that the Organization no longer meets the requirements necessary for charitable registration and should be revoked in the manner described in subsection 168(1) of the Act.

From CRA's Letter of Revocation of Canadian Education Forum:

From our audit, it appears the Organization has migrated from its original intention of educating students in English to purportedly organizing and facilitating a number of speaking engagements held in the Vancouver area. The evidence on the file demonstrates a preponderance of effort and resources devoted to reimbursing a for-profit entity for six speaking events. The events were hosted by [REDACTED], a for-profit organization owned and operated by Mr. Blake Bromley; one of the directors and the sole member of the Organization during the audit period. Between 2010 and 2011, the Organization reimbursed [REDACTED] \$128,499 (78% of total expenses incurred in these years) for the six speaking engagements.

[REDACTED] Event September 28 – October 3, 2010	\$ 72,685
[REDACTED] Event December 7, 2010	\$ 3,361
[REDACTED] Event December 14, 2010	\$ 5,008
[REDACTED] Event February 12 – 16, 2011	\$ 37,286
[REDACTED] Event September 23, 2011	\$ 10,159
Event Expenditures	<u>\$128,499</u>

The expense categories for the six speaking events are:

Honorarium & Taxes Withheld	\$ 58,250
Office Expenses & Books	\$ 2,289
Hotel	\$ 44,571
Travel (flights and other transportation)	\$ 12,994
Meals and entertainment	\$ 564
Education and training	\$ 4,716
Professional fees	\$ 1,068
GST/HST	\$ 1,047
Total Expenditures Incurred by [REDACTED]	<u>\$128,499</u>

Federal Court of Appeal

Federal Court of Appeal



Cour d'appel fédérale

Date: 20130501

Docket: A-310-12

Citation: 2013 FCA 120

Blake Bromley appealed the CRA's revocation of one of his charities, Prescient Foundation.

In 2013, the Federal Court of Appeal upheld the CRA's revocation.

Bromley lost his appeal – but that didn't stop Blake Bromley.

CORAM: PELLETIER J.A.
GAUTHIER J.A.
MAINVILLE J.A.

BETWEEN:

PRESICIENT FOUNDATION

Appellant

and

MINISTER OF NATIONAL REVENUE

Respondent

REASONS FOR JUDGMENT

MAINVILLE J.A.

[1] This is an appeal brought by Prescient Foundation ("Prescient" or the "appellant") pursuant to paragraph 172(3) of the *Income Tax Act*, R.S.C., 1985, c. 1 (5th Supp.) ("Act") from the confirmation by the Minister of National Revenue ("Minister") of a proposal under subsection 168(1) of the Act to revoke the registration of Prescient as a charity.

[2] The Minister relied on the following four independent grounds to sustain the revocation of Prescient's registration: (a) it participated in a tax planning arrangement for the private benefit of others; (b) it transferred an amount of \$574,000 for a share purchase that was in fact a non-

Gone Bananas

**As shown ahead, Chimp staff take
an unconventional approach.**

This employee is a Client Success Specialist.*



* Source: <https://twitter.com/wearechimp/status/943930991197822977> posted December 21, 2017 and <https://www.instagram.com/p/Bc-fWEvFCjx/>

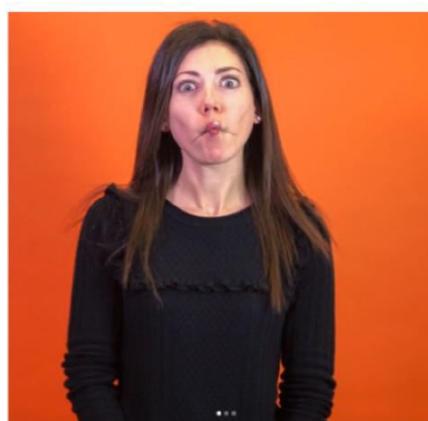
Chimp Staff



Vice President of Operations



Senior Accountant



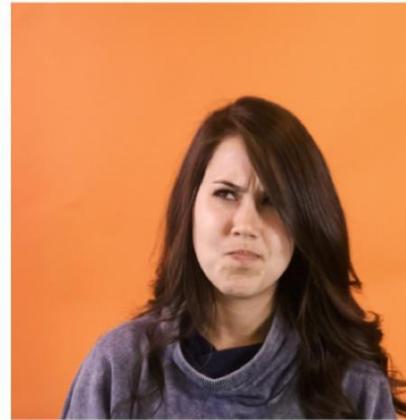
Community Engagement Manager



Senior Software Developer



Data Scientist



Bilingual Client Success Specialist



Technical Product Manager



Director of Experience Design

All of the above photos and job titles are posted on Twitter by Chimp (@wearechimp #TeamThursday).

“Dreamers, Hackers, Creators, and Operators”



← Job Openings

Awesome? Apply Here!

General – Vancouver, British Columbia

Chimp is a purpose-driven technology company that exists to dramatically improve the human experience of participating in charity by empowering people to make an impact on causes they care about on their own terms.

We are a collective of **dreamers, hackers, creators, and operators**. We believe that everyone wants to see positive change in the world and everyone can contribute to creating that change. Our team members are leading the movement to make giving a part of everyday living.

Our team is innovative. Our team is motivated. We hire people who think in big, bold pictures and work hard to make a difference at the office and in the world. We know we have a team of all-stars, so we offer competitive salaries, purposeful perks, and a culture that gives back and has fun doing it! Plus, you won't find better lunchtime conversation anywhere else in town.

Awesome? Apply Here!

Is your perfect position not posted?

We are always on the look-out for top tech talent, so if you have a knack for designing human solutions to complex problems or if you can write stellar code in your sleep - we want to hear from you!

Chimp's “Research Team”



“\$200 Million”



\$200 Million Milestone Mania Party!!
#WeAreChimp

In April of 2017, Chimp announced on Twitter that it had held a “\$200 Million Mania Party” to celebrate its \$200 million milestone.



“\$400 Million”

**As of September 2018,
Chimp claims that it
has helped Canadians
donate “more than \$400 million
to thousands of charities.”**

**“And we’re just getting
started,” Chimp says.**



← Job Openings

Quality Assurance / Test Automation Developer

Engineering – Vancouver, British Columbia

ABOUT CHIMP

CHIMP (Charitable Impact) was founded to radically transform how people experience giving. Our online platform makes it easy to support the causes you care about, raise money with others, and track your impact over time, all in one place. We also help donors make their biggest impact with strategic giving support.

By empowering people to give on their terms, we've helped Canadians donate more than **\$400 million to thousands of charities**—and we're just getting started!

QUALITY ASSURANCE /TEST AUTOMATION DEVELOPER

Reports To: VP of Technology

Status: Full Time, Permanent (40 hours per week)

What You'll Do

Working in a QA role on an agile development team, you actively participate in planning, developing, and executing the QA strategy for our donor-centered charitable giving platform. You are responsible for contributing to and verifying the quality of your team's deliverables. Embracing our philosophy of continuous improvement, you are

“\$420 Million”

As of November of 2018, Chimp claims that it has helped Canadians donate “more than \$420 million to thousands of charities.”

Over \$420 million and counting

The CHIMP community has donated over \$420 million to date, benefiting thousands of Canadian charities.

“We’ve collaborated with many generous organizations.”

We've collaborated with many generous organizations to make giving a part of everyday life:



You can give to more than 85,000 organizations with CHIMP, including:



Chimp Compared to Vancouver Foundation

To understand Chimp, it is useful to compare it to Vancouver Foundation.

For 75 years, Vancouver Foundation has been the champion of charity in Vancouver.

Vancouver Foundation has clearly stated priorities: homelessness, reconciliation with First Nations, youth engagement, the opioid crisis, environmental protection, and so on. In contrast, Chimp does not state any specific areas of focus nor does it publish an annual report of its activities.

The following pages compare Chimp to Vancouver Foundation in terms of total assets, revenue, expenditures and the amounts that both foundations grant to other charities.



Total Assets

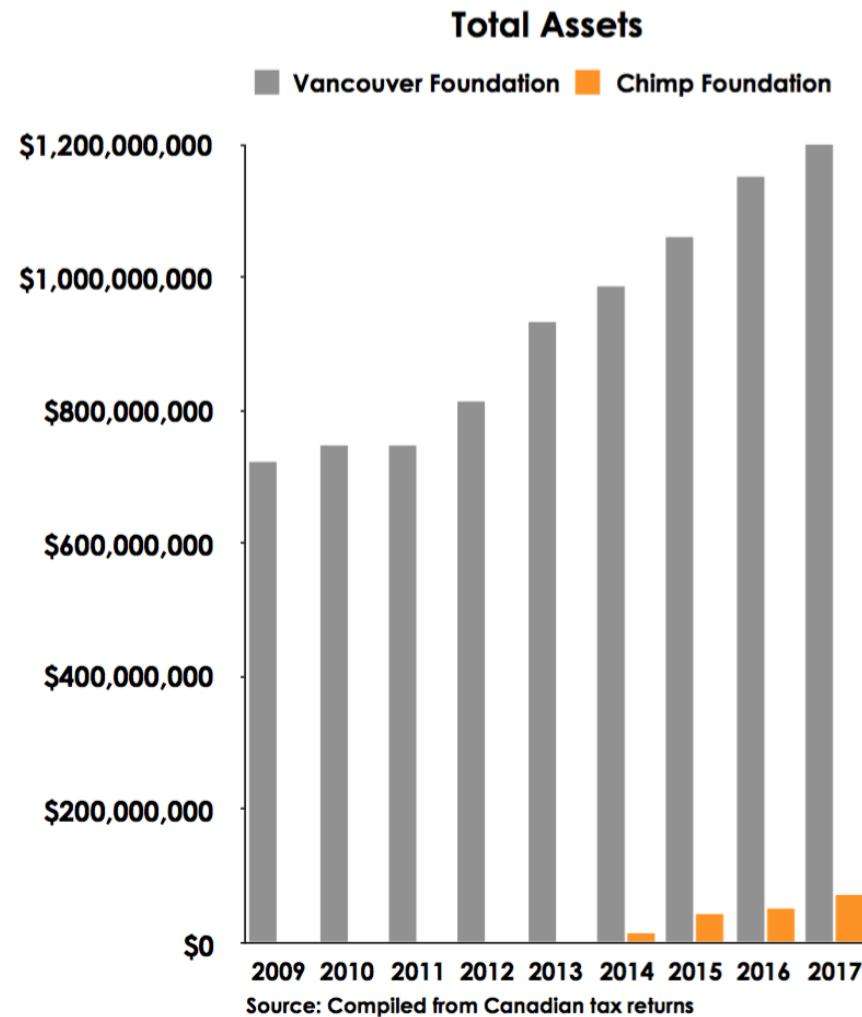
With \$1.1 billion in assets, Vancouver Foundation has significant assets that Chimp does not.

On interest and investment income alone, Vancouver Foundation earned \$95 million in 2017.

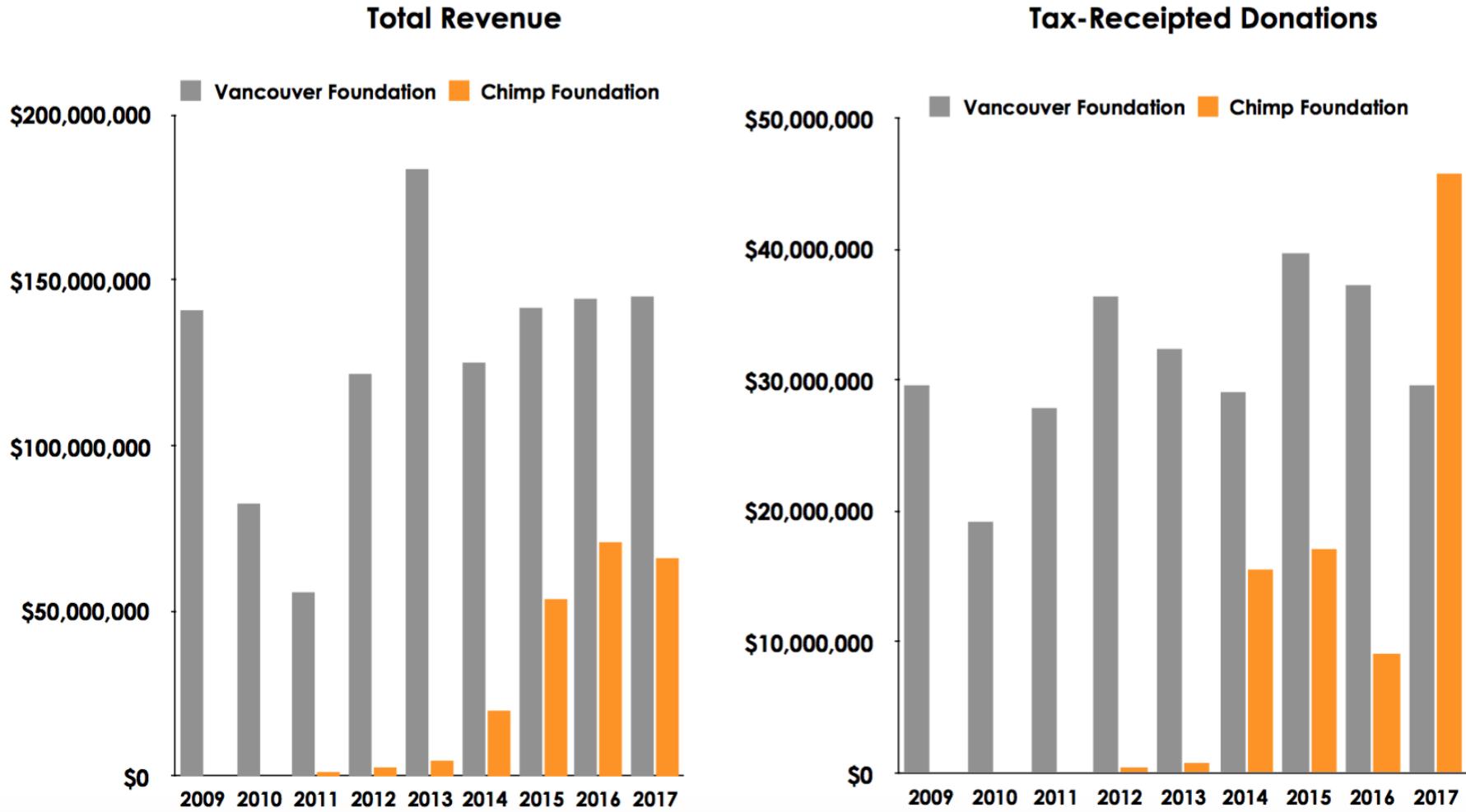
Revenue

As shown on the next page, in 2017 Chimp reported total revenue of \$66 million, less than half of Vancouver Foundation.

In terms of tax-receipted donations, however, Chimp reported \$45 million compared to \$30 million for Vancouver Foundation.



Total Revenue & Tax-Received Donations



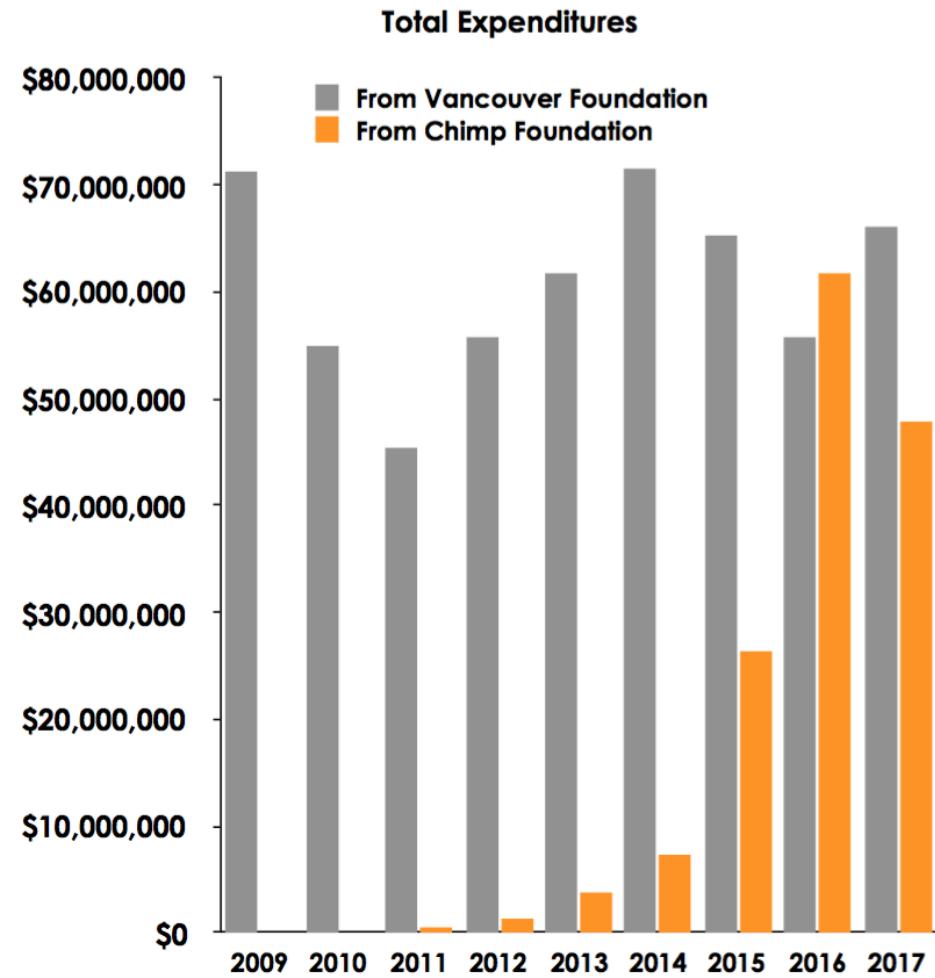
Total Expenditures

Chimp's total expenditures have grown fast since 2011.

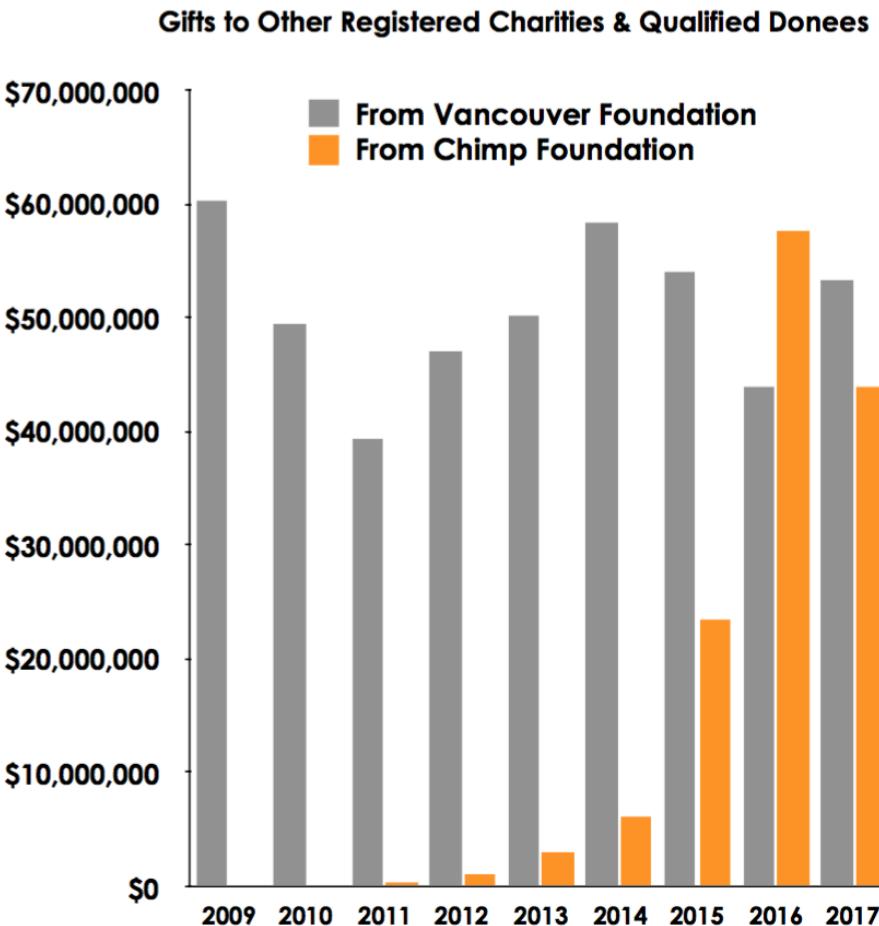
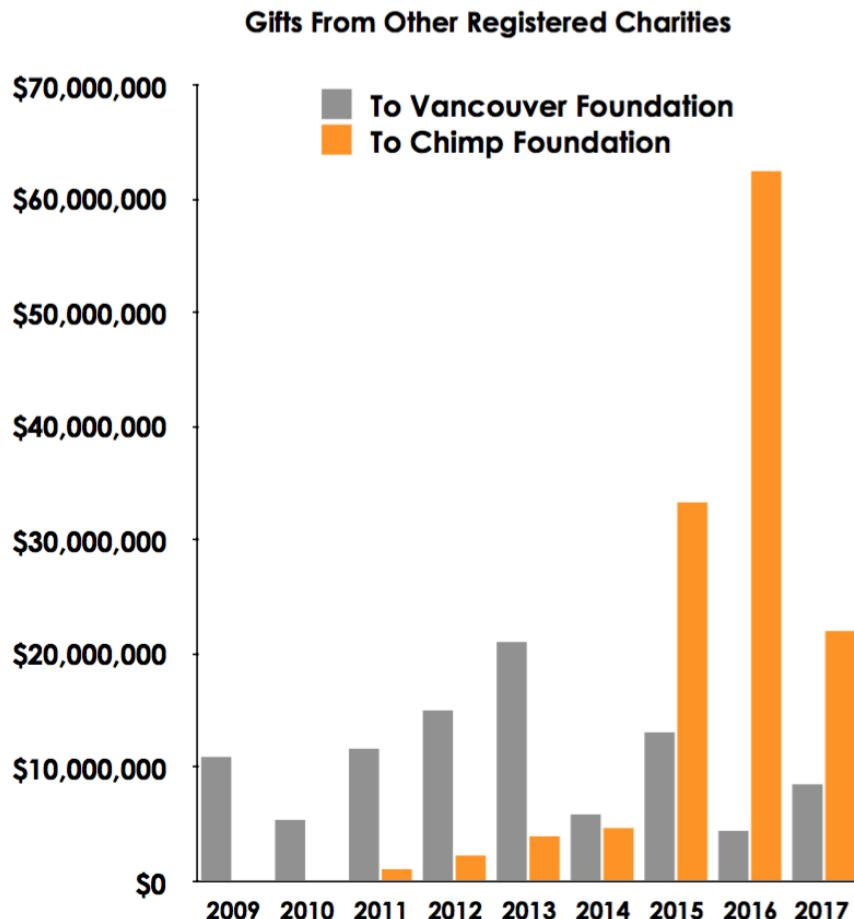
In fact, in 2016 Chimp out-spent Vancouver Foundation by \$6 million:

- Chimp: \$61 million
- Vancouver Foundation: \$55 million

As shown on the next page, Chimp has dramatically increased both the amounts that Chimp receives from other charities as well as its gifts to other charities.



Amounts Received From & Paid To Other Charities

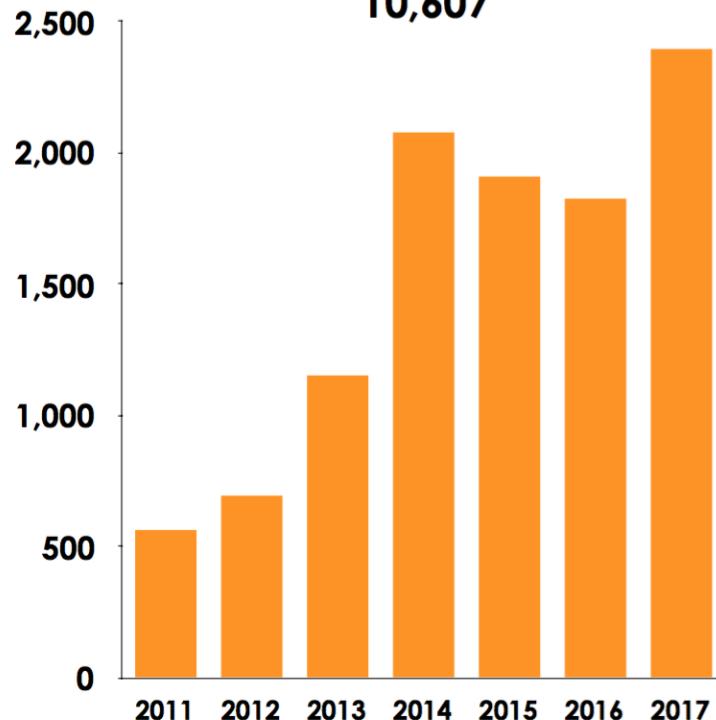


>10,000 Gifts to Qualified Donees

Chimp has made more than 10,000 gifts to other charities and qualified donees for a total of \$135 million (2011–2017), tax returns say.*

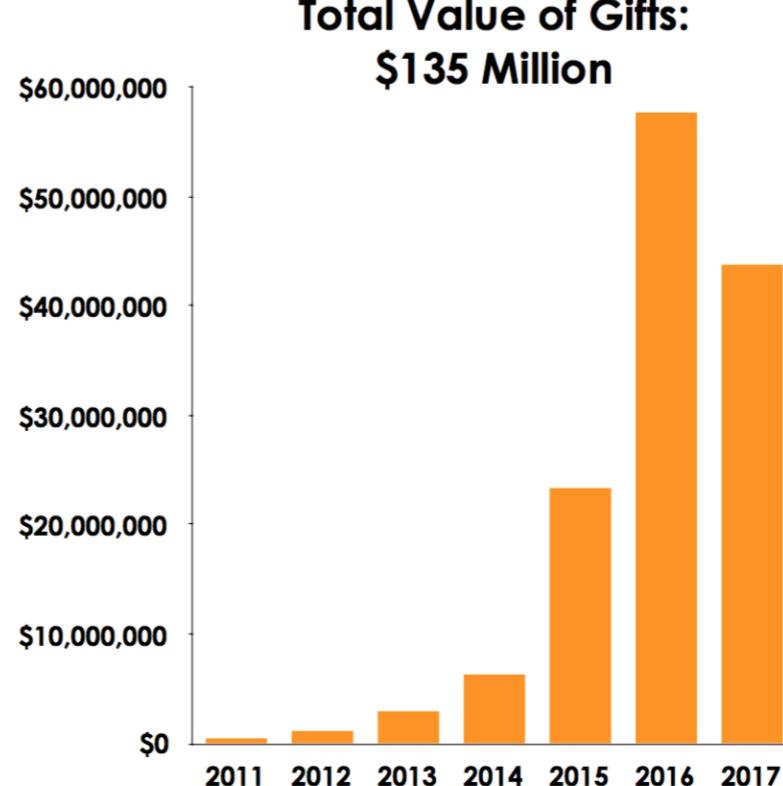
Total Number of Gifts:

10,607



Total Value of Gifts:

\$135 Million



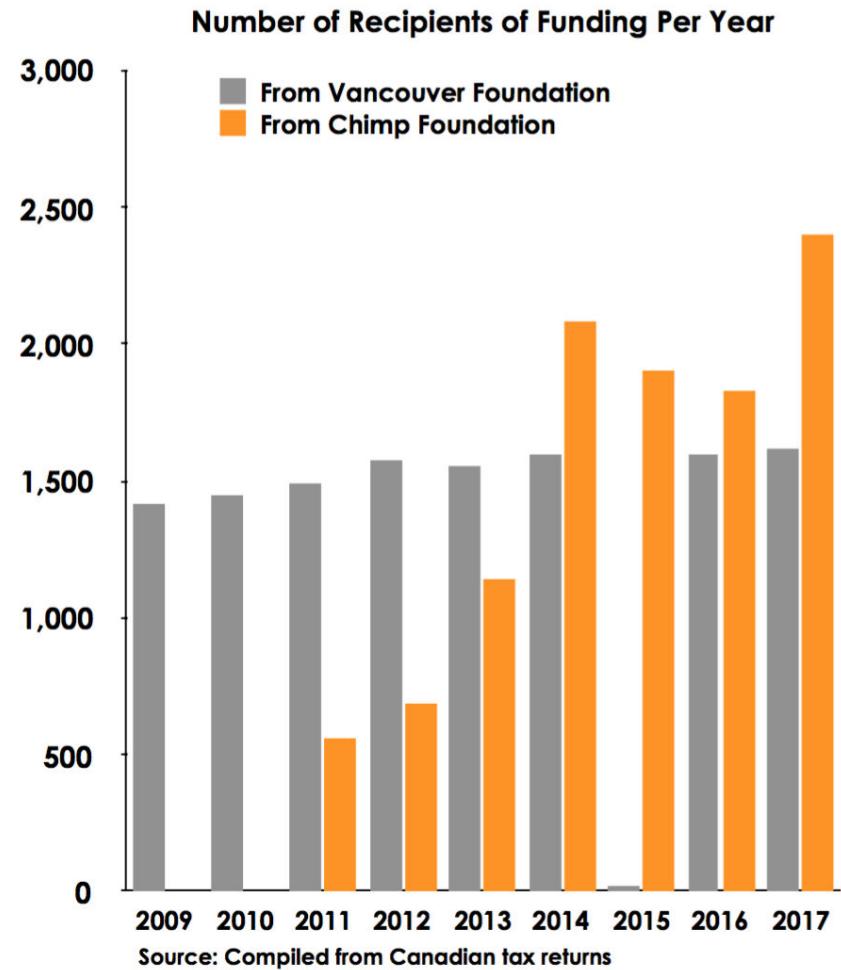
Total Number of Organizations Funded

Compared to Vancouver Foundation, the number of organizations that Chimp funds has increased dramatically in a few years.

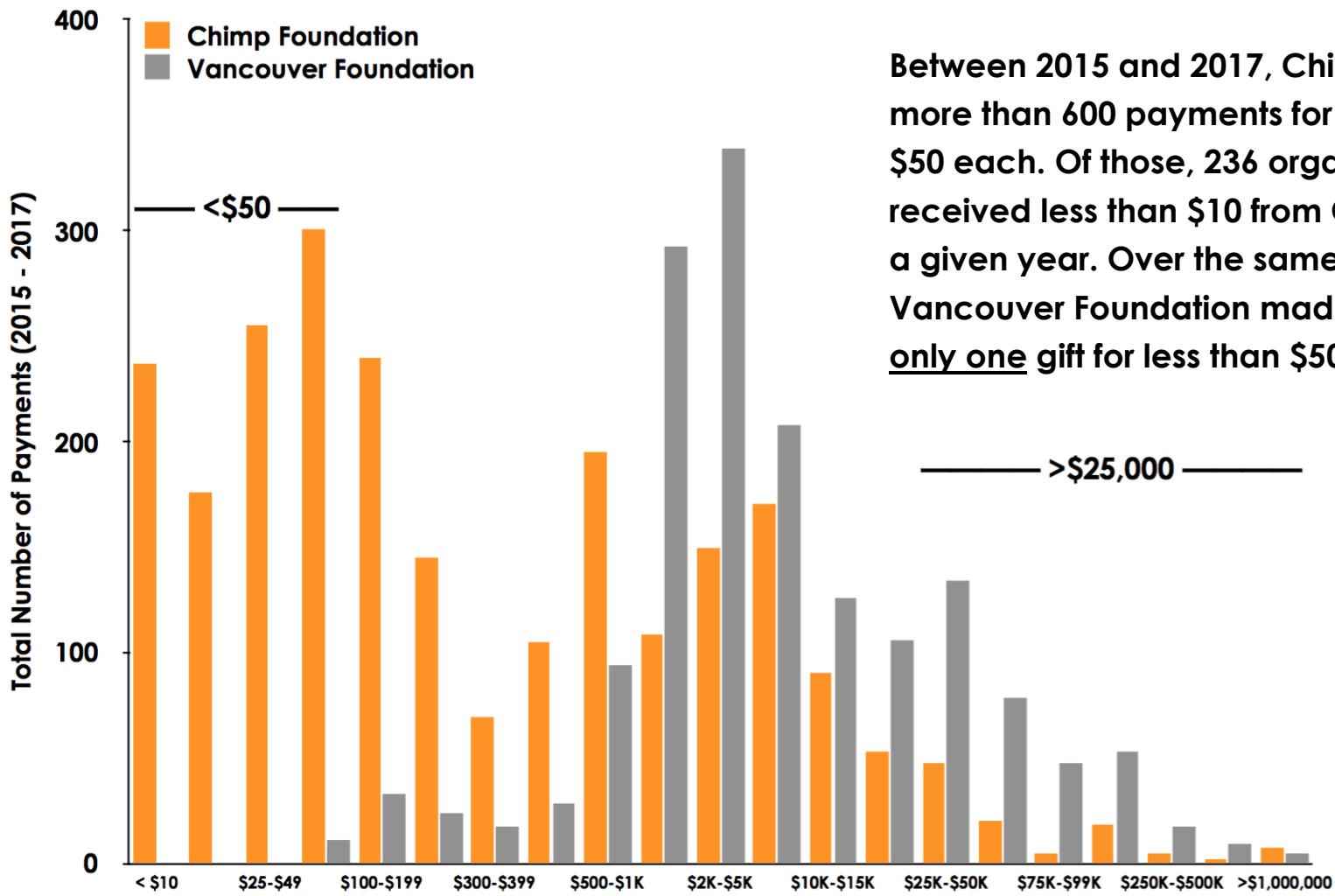
Vancouver Foundation makes approximately 1,500 gifts every year. (Exception: 2015).

In its first year, Chimp funded 562 organizations. Since then, Chimp has quadrupled the number of organizations that it funds. Within the charitable sector, this rate of growth is unusually high.

As shown on the next page, there is a stark difference in the size of the payments made by Chimp vs. Vancouver Foundation.



Distribution of Payments (2015 – 2017)

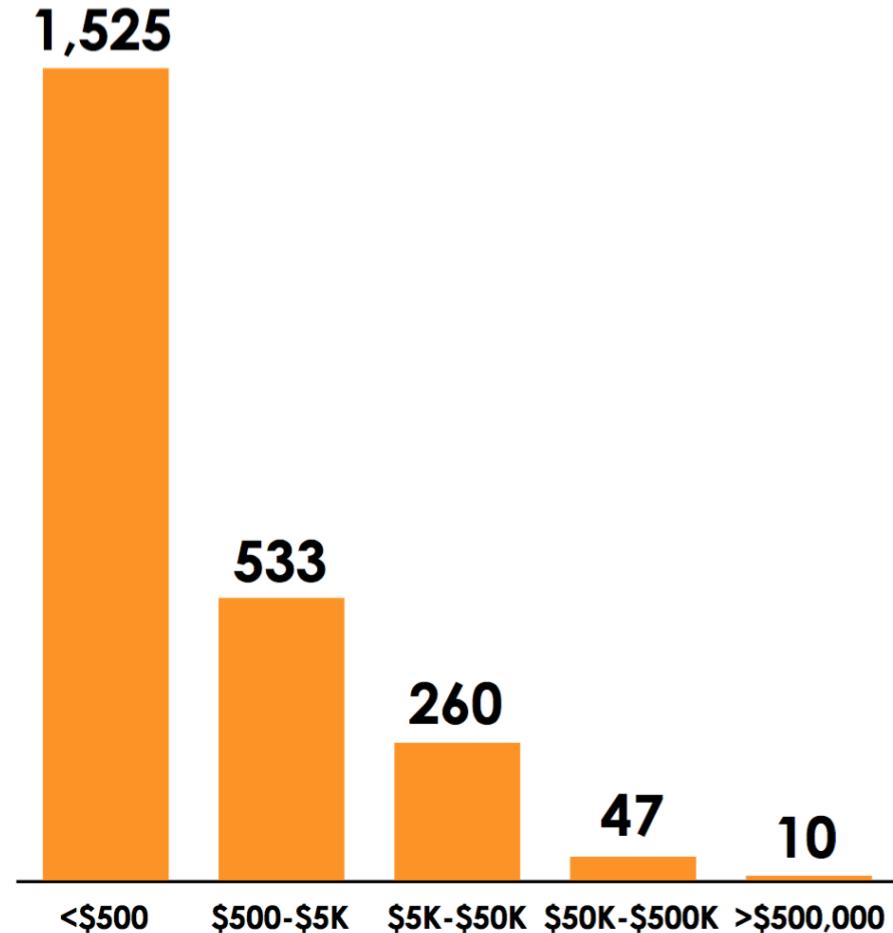


Between 2015 and 2017, Chimp made more than 600 payments for less than \$50 each. Of those, 236 organizations received less than \$10 from Chimp in a given year. Over the same period, Vancouver Foundation made only one gift for less than \$50.

420 Payments Less Than \$25 (2017)

In 2017, more than 1,500 of Chimp's gifts were for \$500 or less. In fact, 420 payments were for \$25 or less.

Only ten payments were for \$500,000 or more – and of those, at least six went to Bromley charities.



Less Than \$10

**The Alzheimer Society,
The Toronto Rape Crisis Centre,
The Sexual Assault Centre of Edmonton,
Epilepsie Montréal, and Canada Without Poverty
were all funded by Chimp in 2017.
However, none received more than \$10.**

Addictions & Mental Health Ontario received \$4.

Autism Society of Ontario received \$5.

These grants are so tiny that it is hard to see how they were intended to have an impact. As such, it is reasonable to question whether these tiny grants were provided to serve a charitable purpose – or perhaps another purpose that is not exclusively charitable.

Qualified donee #325

Name of organization: **Addictions And Mental Health Ontario**
Associated charity: No
Business number/Registration number: 118781558 RR 0001
City: Toronto
Province/Territory: ON
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 4
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #699

Name of organization: **Autism Society Ontario**
Associated charity: No
Business number/Registration number: 119248789 RR 0001
City: Toronto
Province/Territory: ON
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 5
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Less Than \$10

Qualified donee #1755

Name of organization: **Borneo Orangutan Society Canada**
Associated charity: No
Business number/Registration number: 862824786 RR 0001
City: Toronto
Province/Territory: ON
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 4
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #1653

Name of organization: **Canadian Bipolar Foundation**
Associated charity: No
Business number/Registration number: 855889713 RR 0001
City: North Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 9
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #1631

Name of organization: **Kids Kicking Cancer Canada Corp.**
Associated charity: No
Business number/Registration number: 853753051 RR 0001
City: London
Province/Territory: ON
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 8
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

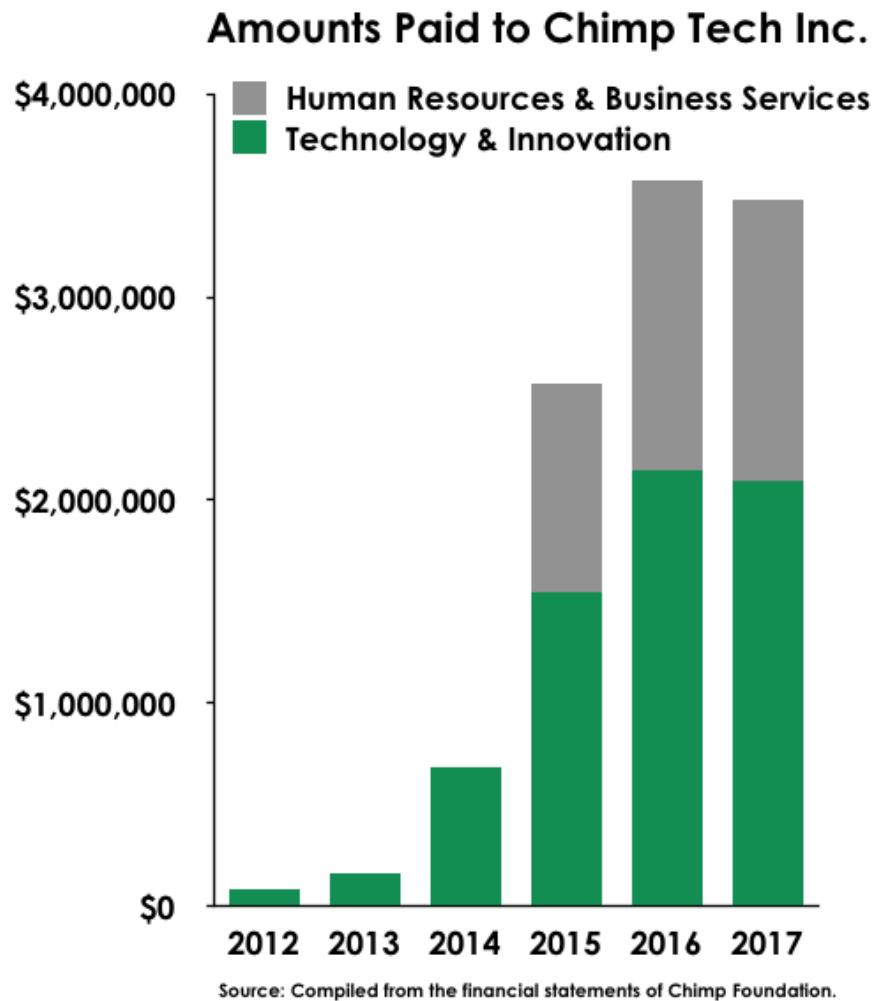
Qualified donee #2027

Name of organization: **BC Lupus Society**
Associated charity: No
Business number/Registration number: 887586469 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 9
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

\$10.5 Million Paid to Chimp Technology Inc.

Over the same years that Chimp Foundation has made thousands of very tiny payments, Chimp paid at least \$10.5 million to Chimp Technology Inc., a for-profit company run by John Bromley, Blake Bromley's son.

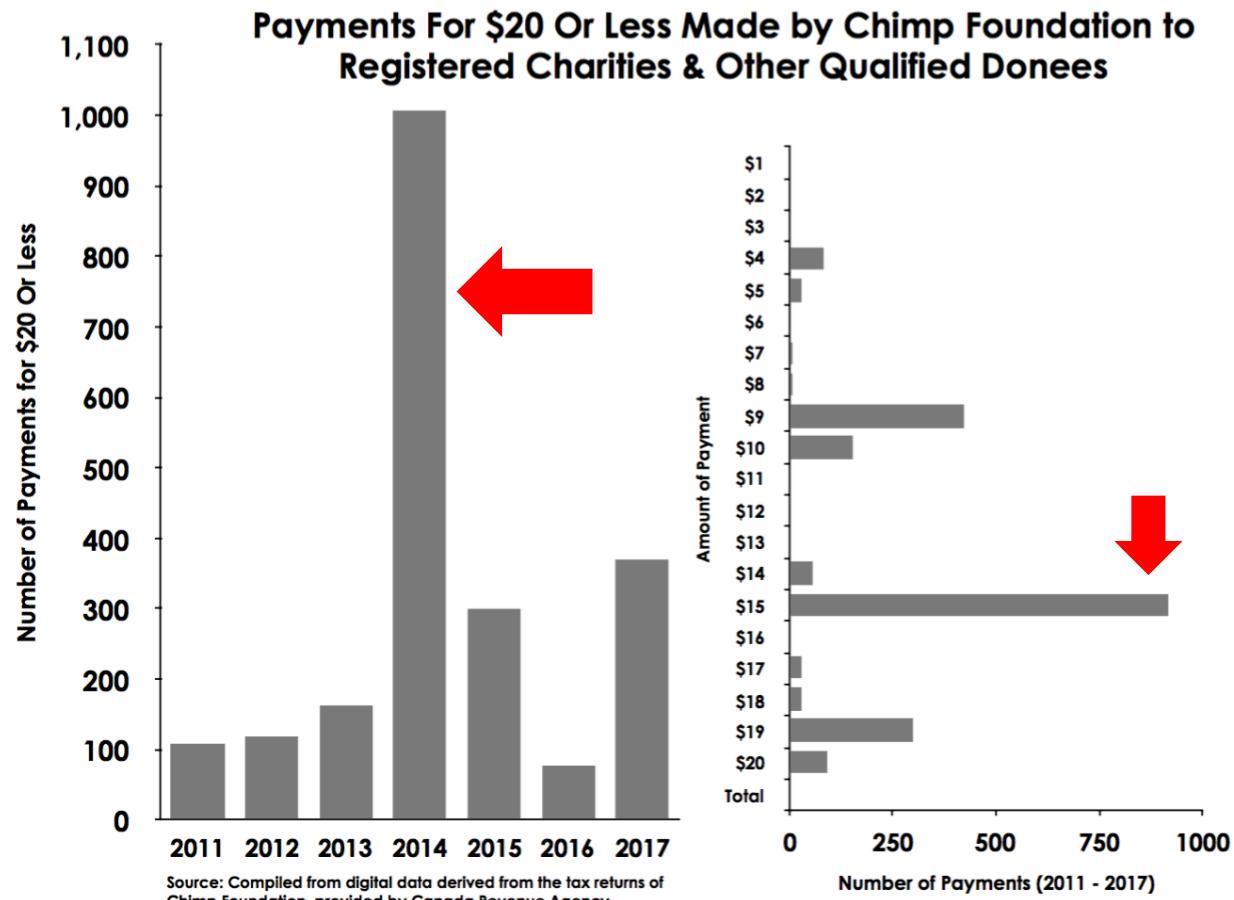
Appendix B provides excerpts of Chimp's financial statements, reporting these payments.



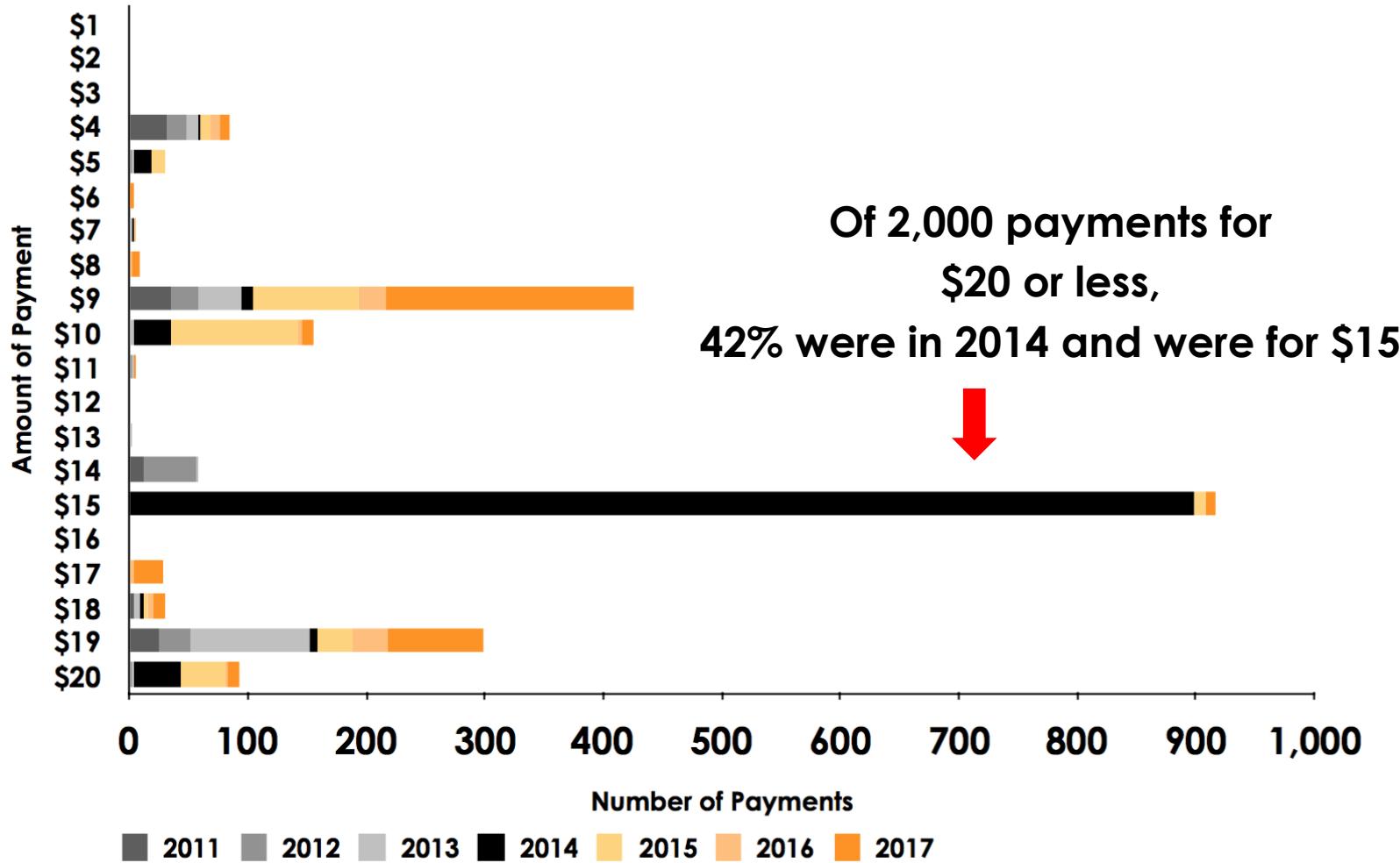
Number Preference

Chimp claims that it has been used by “more than 100,000 Canadians.”¹ If true, one would expect a normal distribution in the amounts of gifts from Chimp. But this is not seen.

The apparent number preference pattern in the amounts of tiny gifts made by Chimp does not suggest that these payments were randomly made.



900 Payments for \$15



Source: Compiled from digital data derived from the tax returns of Chimp Foundation, provided by Canada Revenue Agency

Gifts of \$4, \$9 and \$19

Typically, donors who give small amounts will give \$5, \$10 or \$20. But not to Chimp.

Chimp made three times as many gifts for \$4 as it did for \$5.

Chimp also made almost three times as many gifts for \$9 as for \$10, and three times as many gifts for \$19 as for \$20.

Payments From Chimp Foundation to Registered Charities & Qualified Donees														
	Number of Payments								Percentage of Total # of Payments					
	2011	2012	2013	2014	2015	2016	2017	2011-2017	2011	2012	2013	2014	2015	2016
\$1								0	0%	0%	0%	0%	0%	0%
\$2								0	0%	0%	0%	0%	0%	0%
\$3								0	0%	0%	0%	0%	0%	0%
\$4	32	16	11	1	8	8	8	84	1%	1%	1%	0%	0%	0%
\$5		2	1	15	12		1	31	0%	0%	0%	1%	1%	0%
\$6			1				2	3	0%	0%	0%	0%	0%	0%
\$7	1		1	2		1	1	6	0%	0%	0%	0%	0%	0%
\$8					1	1	7	9	0%	0%	0%	0%	0%	0%
\$9	35	24	35	10	90	22	209	425	2%	1%	2%	0%	4%	1% 10%
\$10			3	32	108	3	9	155	0%	0%	0%	1%	5%	0%
\$11		2	2				1	5	0%	0%	0%	0%	0%	0%
\$12				1				1	0%	0%	0%	0%	0%	0%
\$13		1	1					2	0%	0%	0%	0%	0%	0%
\$14	12	45	1					58	1%	2%	0%	0%	0%	0%
\$15				898	10	1	8	917	0%	0%	0%	42%	0%	0%
\$16								0	0%	0%	0%	0%	0%	0%
\$17					1	3	25	29	0%	0%	0%	0%	0%	1%
\$18	4		5	3	3	6	9	30	0%	0%	0%	0%	0%	0%
\$19	25	26	101	6	30	30	81	299	1%	1%	5%	0%	1%	1% 4%
\$20		2	2	39	38	2	10	93	0%	0%	0%	2%	2%	0%
Total	109	118	164	1,007	301	77	371		5%	5%	8%	47%	14%	4% 17%
						2,147		2147				100%		

Chimp is “Free”

Chimp does not charge fees, it says.¹

How much does CHIMP charge? Nothing!

We believe giving should be cost-effective, that's why we do not charge an administrative fee on your gifts. And having a CHIMP Account is also free.

So if Chimp does not charge fees, how can it afford to pay its growing staff?

How has Chimp been able to pay \$10.5 million to Chimp Technology Inc.?

Recent Ads for Jobs At Chimp:

- Controller: <https://chimp.bamboohr.com/jobs/view.php?id=55>
- UX Researcher: <https://chimp.bamboohr.com/jobs/view.php?id=62>
- UX/UI Designer, Donor Experience Specialist:
<https://web.archive.org/web/20180806212614/https://chimp.net/careers>

¹ Source: <https://chimp.net/fees>

Fees on “Investment Accounts:” 0.25% to 0.5%

Elsewhere at Chimp’s web-site, Chimp says that on “Investment Accounts,” Chimp does charge fees, between 0.25% and 0.5%, to a maximum of \$15,000 per account.¹ Still, how does this fee schedule account for the revenue that Chimp has used to pay \$12 million in fees?

Between 2011 and 2018, Chimp reported total revenue of \$218 million, \$88 million in tax-receipted donations and \$129 million from other charities. Interest and investment income was \$2 million. So, which revenue was used to pay \$10.5 million to Chimp Technology Inc.? Tax-receipted income? Or revenue from other charities?

CHARITABLE INVESTMENT ACCOUNT BALANCE	CHIMP FEE (ANNUAL)
\$1 - \$999,999	0.50%
\$1,000,000 - \$5,999,999*	0.25%

*The CHIMP fee is capped at a maximum of \$15,000 per Charitable Investment Account regardless of account balance.

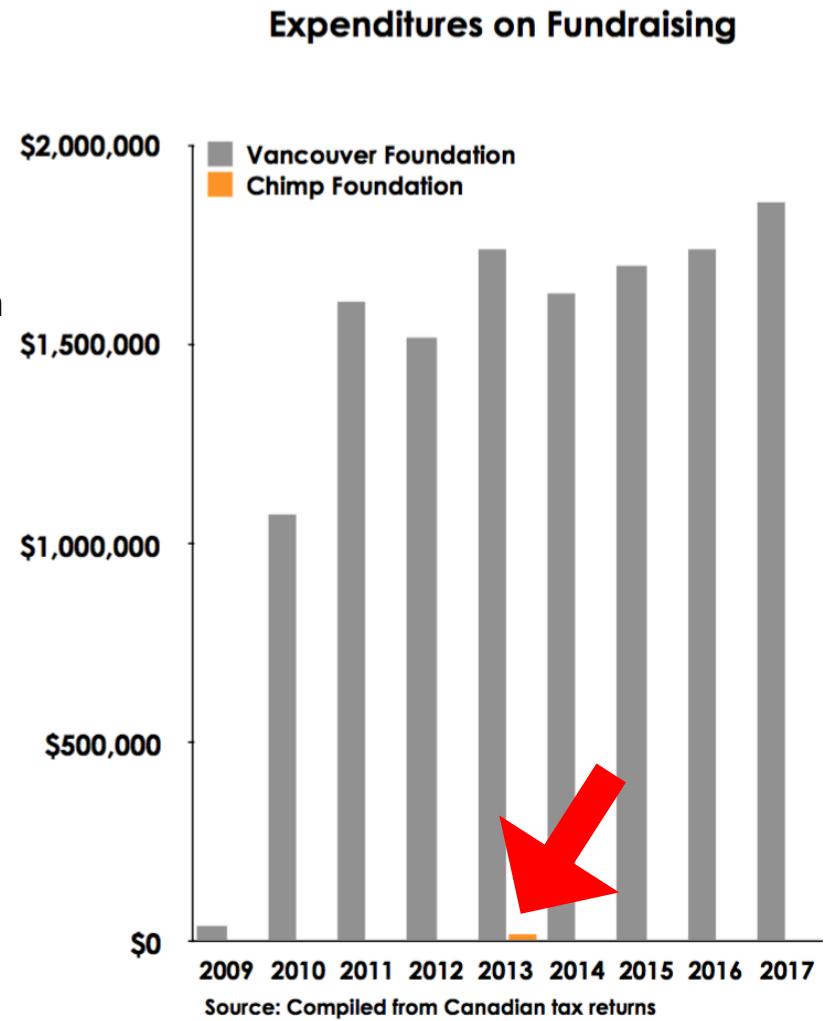
¹ Source: <https://help.chimp.net/article/136-fees>

Chimp's Fundraising Compared to Vancouver Foundation

Chimp's expenditures have grown fast even though Chimp has spent virtually nothing on fundraising.

Between 2011 and 2017 Chimp spent only \$19,222 on fundraising. Over the same period, Vancouver Foundation spent \$11.7 million.

How did Chimp grow so fast and yet spend so little on fundraising?



Chimp's Largest Gifts: 17 out of 20 Went to Bromley Charities

The top payments made by Chimp provide a glimpse of its giving as a whole.

Of Chimp's top 20 gifts since 2011, at least 17 have gone to Bromley charities. These 17 payments account for 0.2% of the 10,000 grants made by Chimp. By value, these 17 gifts account for \$89 million, fully 66% of Chimp's total grant-making since 2011.

<u>Recipient Organization</u>	<u>Year</u>	<u>Amount</u>
Zawadi Foundation	2016	\$30,475,000
Viva Voce Charitable Foundation	2017	\$14,614,210
Foundation For Public Good	2016	\$9,850,000
Paraklesis Foundation	2015	\$5,888,009
Foundation for Public Good	2015	\$4,900,000
A Cappella Foundation	2017	\$4,349,975
Snowdon Foundation	2017	\$4,182,931
Global View Foundation	2016	\$3,619,975
Foundation For Public Good	2017	\$3,319,985
Virtual Vancouver Foundation	2017	\$3,074,999
Community Evolution Foundation	2015	\$2,031,081
Imladris Foundation	2016	\$2,000,000
Maple Syrup Mafia Foundation	2015	\$1,781,999
Fortius Foundation	2013	\$1,551,375
Virtual Vancouver Foundation	2016	\$1,112,999
Foundation for Public Good	2014	\$1,088,993
Homestead on the Hill Foundation	2015	\$1,075,000
Mulgrave Independent School Society	2017	\$1,000,000
Stewards' Charitable Foundation	2017	\$1,000,000
Sounds Of Hope Foundation	2016	\$894,411

Total: \$97,810,942

Top Recipients: Chimp Compared to Vancouver Foundation

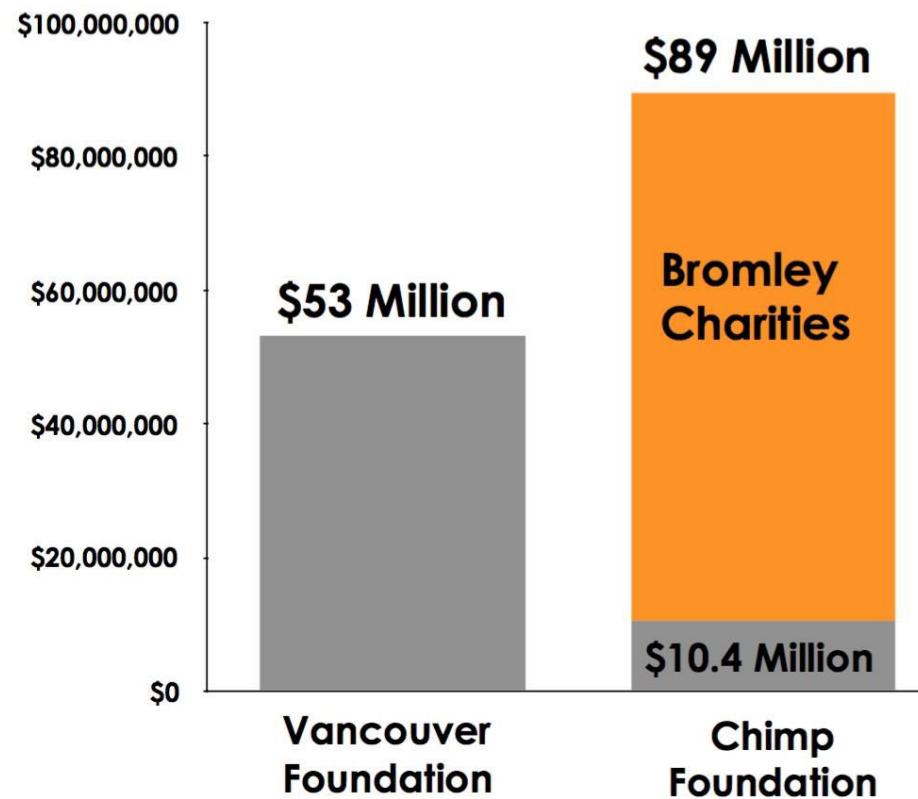
The following pages show the top ten recipients of funds from Chimp compared to Vancouver Foundation.

The amounts of the top ten grants in each of the past 3 years are combined in the figure. As shown, the total value of the top ten grants in each of 2015, 2016 & 2017 was:

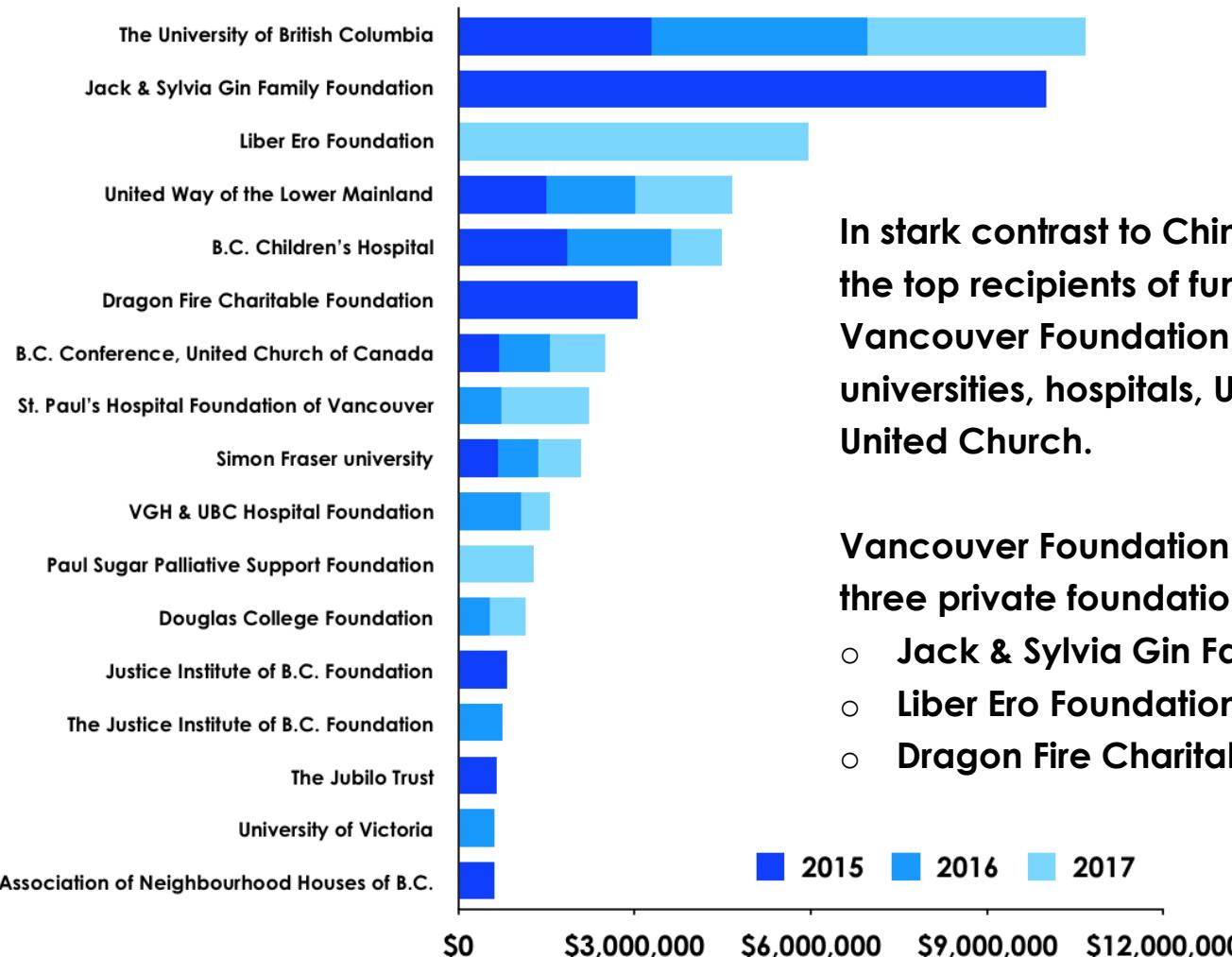
- Vancouver Foundation: \$53 million
- Chimp Foundation: \$89 million

As shown ahead, the majority of the funds granted by Chimp went to Bromley charities. Excluding grants to Bromley charities, the combined value of Chimp's top ten grants in each year was \$10.4 million, not \$89 million.

**Top Ten Recipients Each Year
(2015, 2016 & 2017)**



Top Recipients of Vancouver Foundation



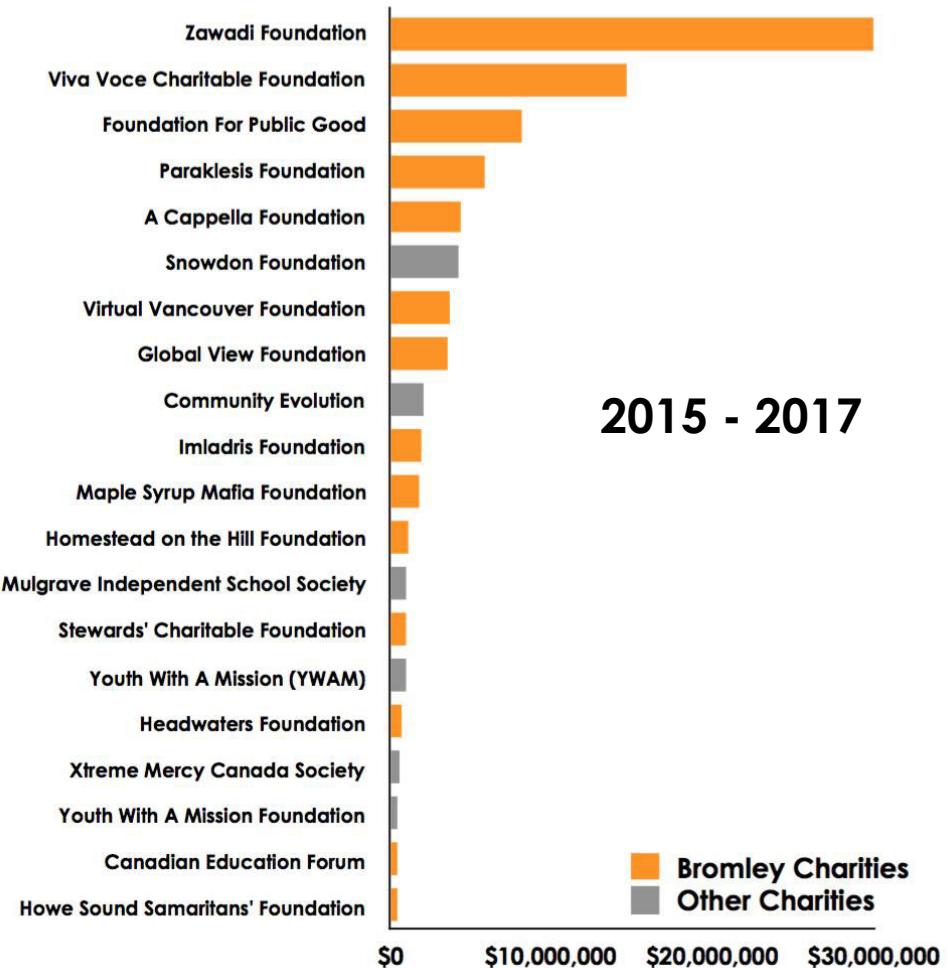
In stark contrast to Chimp, between 2015 and 2017, the top recipients of funds from Vancouver Foundation were mostly universities, hospitals, United Way and the United Church.

Vancouver Foundation also gave large grants to three private foundations:

- Jack & Sylvia Gin Family Foundation
- Liber Ero Foundation &
- Dragon Fire Charitable Foundation.

Top Recipients of Chimp Foundation

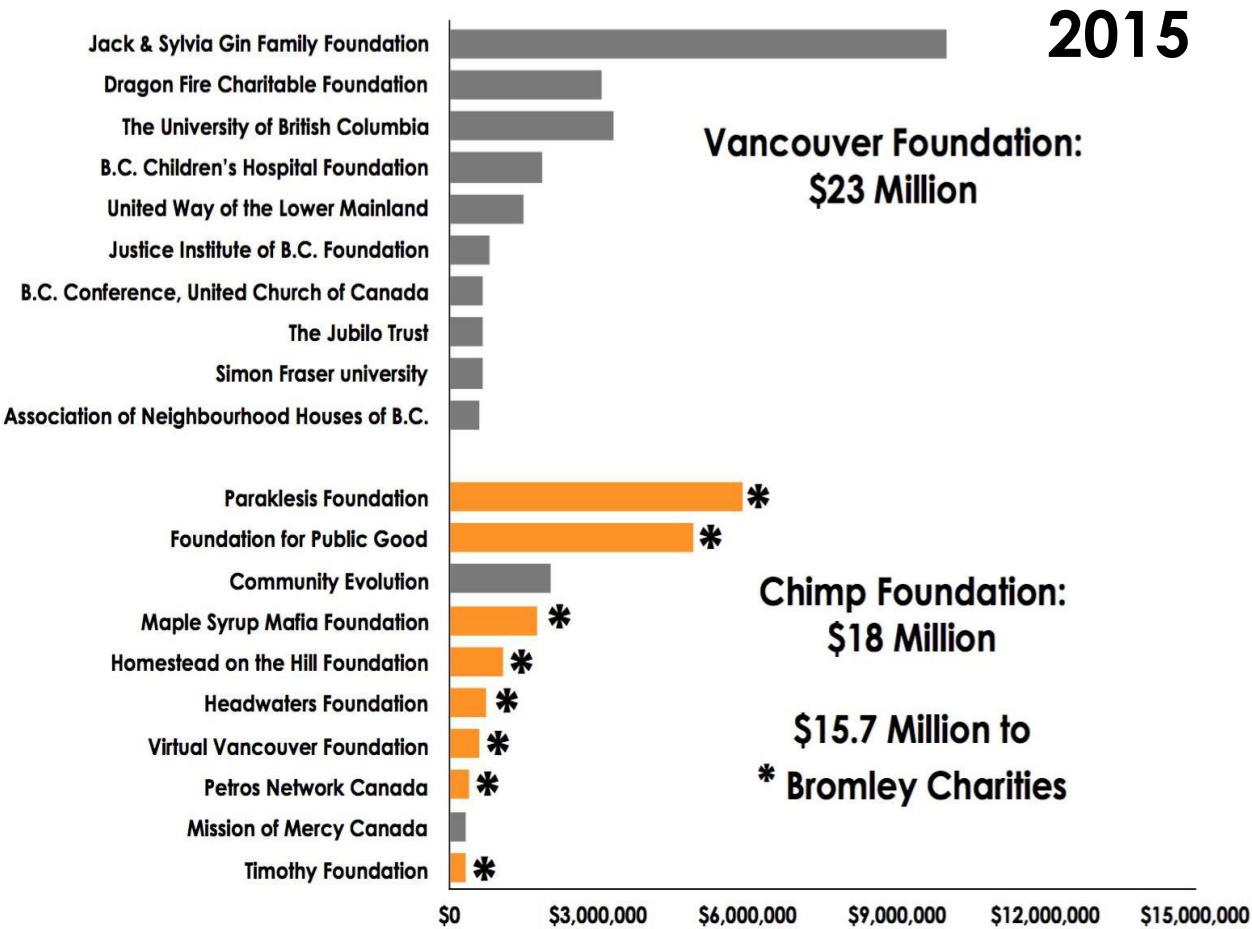
Between 2015 and 2017, most of the top recipients of funds from Chimp were Bromley charities.



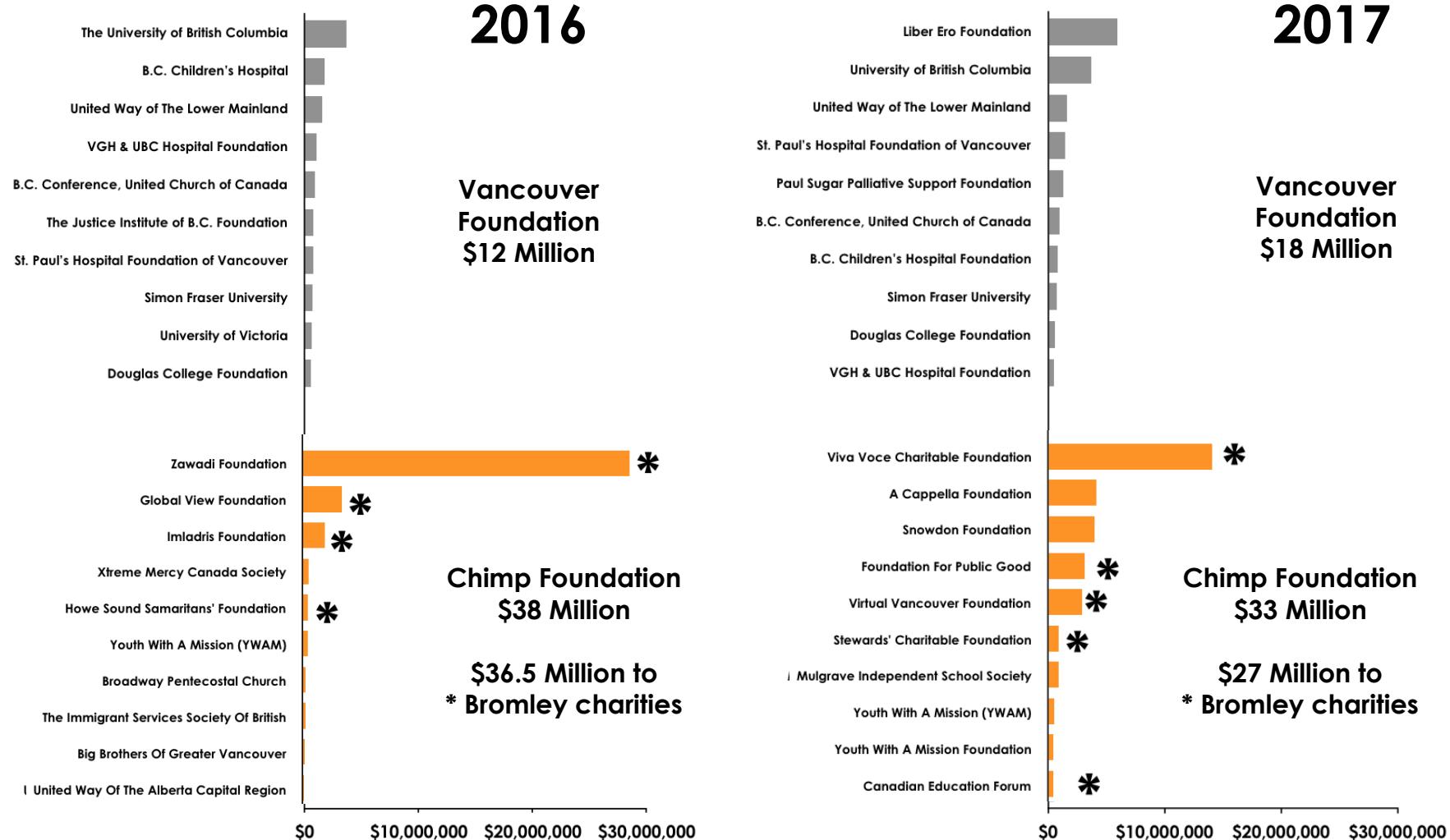
Top Recipients: Chimp Compared to Vancouver Foundation

In 2015, the combined value of the top ten grants made by Chimp was \$18 million. Of that, \$15.7 million went to Bromley charities

Similar pattern for 2016 & 2017, as shown on the next page.

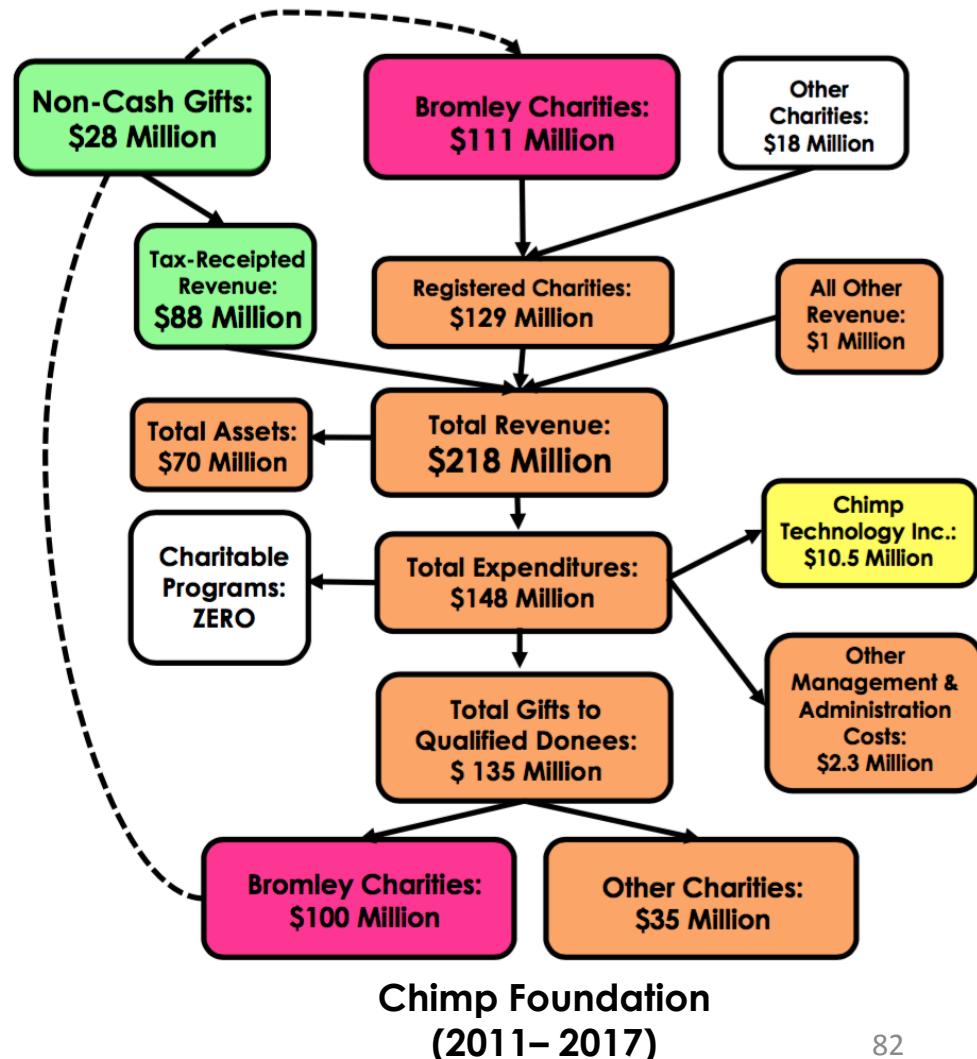


Top Recipients: Chimp Compared to Vancouver Foundation



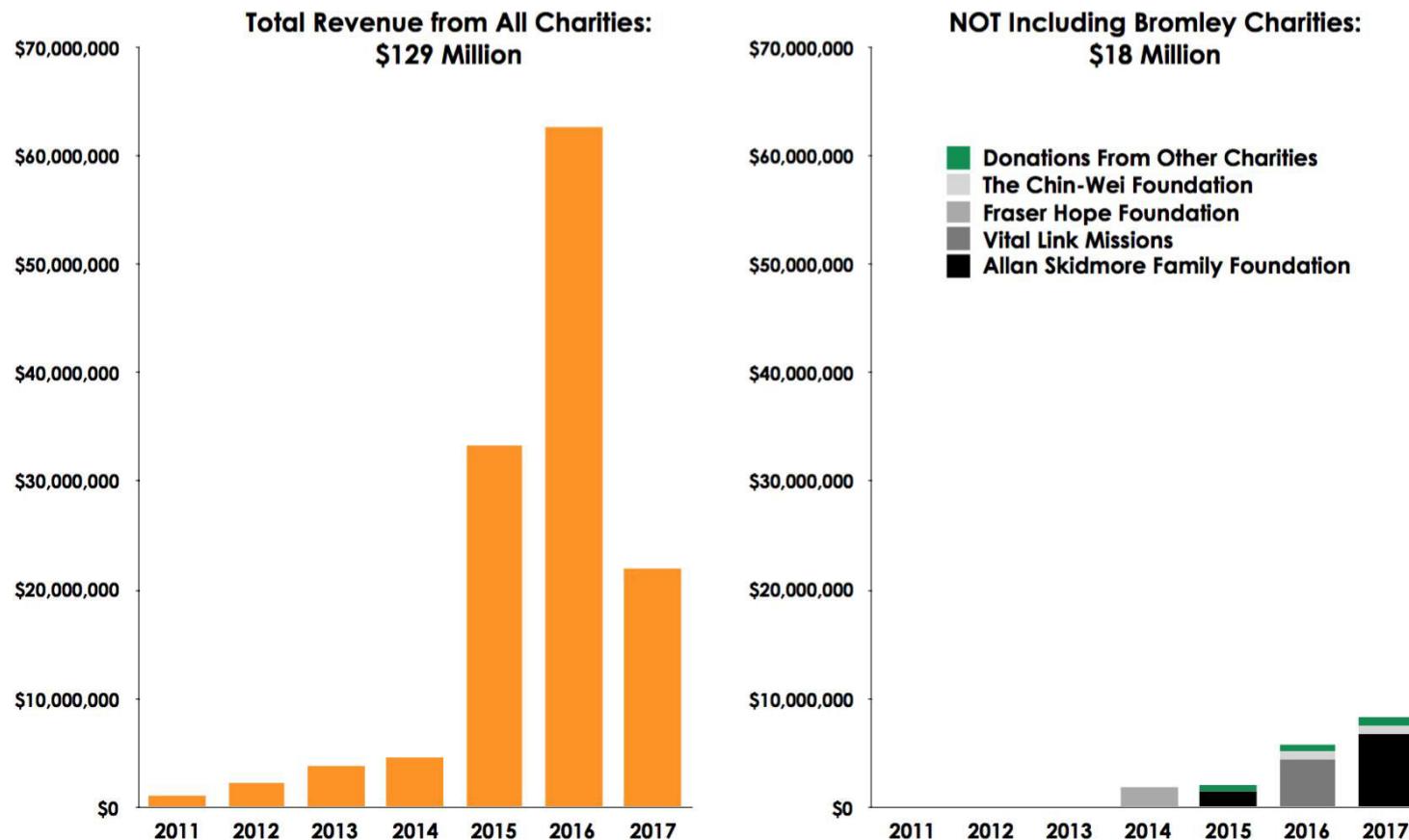
\$100 Million

In summary of the previous pages, at least \$100 million of Chimp's revenue & expenditures appears to be money that has gone through Chimp's books but has not been spent on charitable purposes. But this is not easily noticed in Chimp's tax returns, because, in part, of all the thousands of tiny grants that Chimp makes.



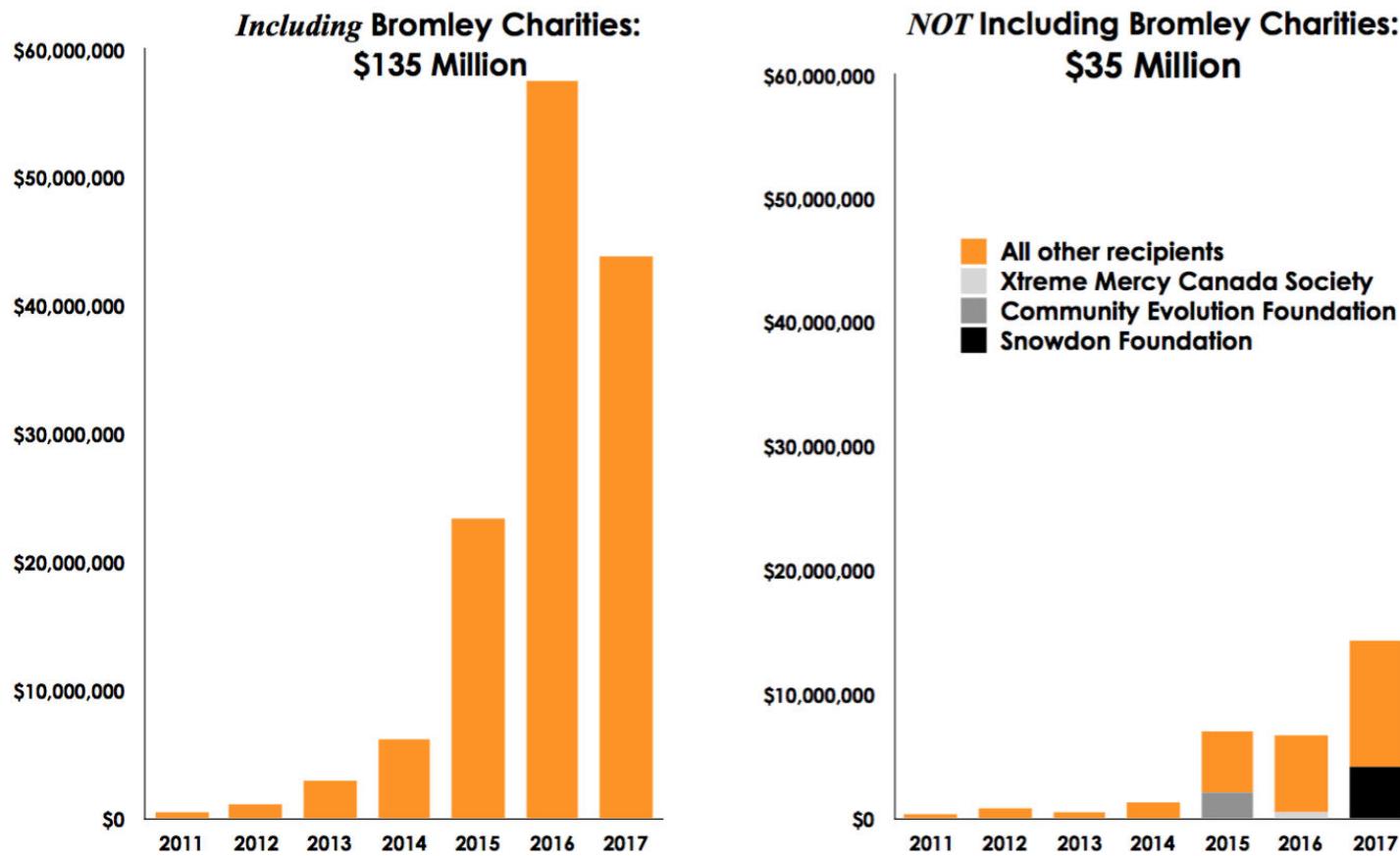
Chimp Revenue Inflated

Without the \$111 million from Bromley charities, Chimp's revenue would look very different.
Total revenue from charities would be \$18 million, not \$129 million.



Chimp Grantmaking Inflated

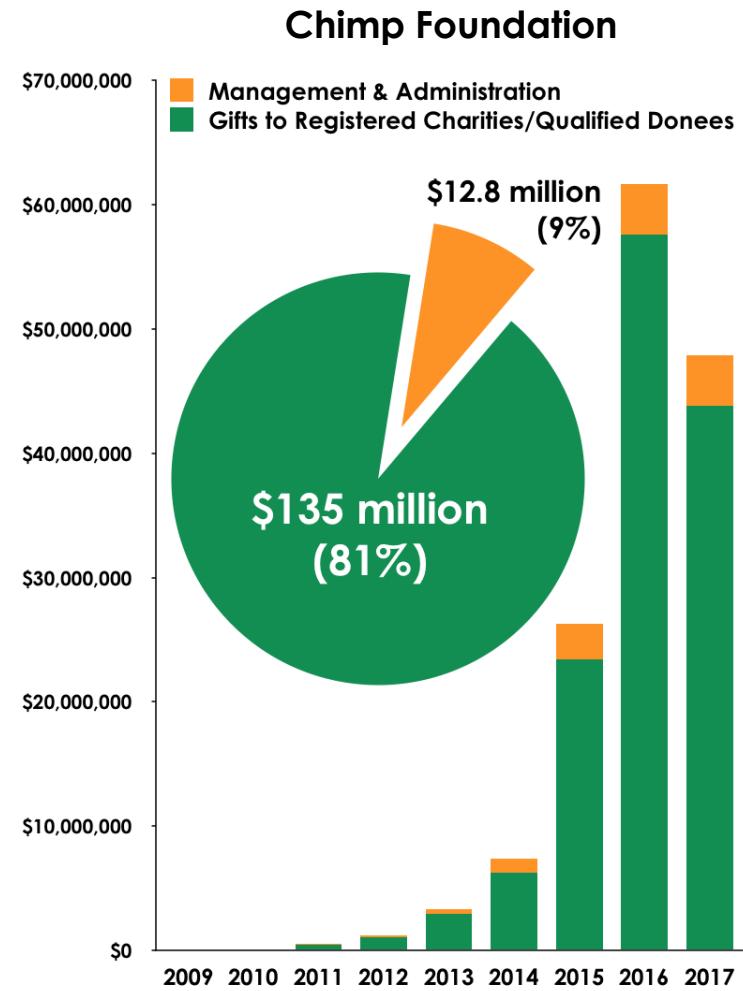
When amounts granted to Bromley charities are excluded, Chimp's total grant-making is \$35 million, not \$135 million.



Chimp's Overhead

At first look, Chimp appears to have low overhead.

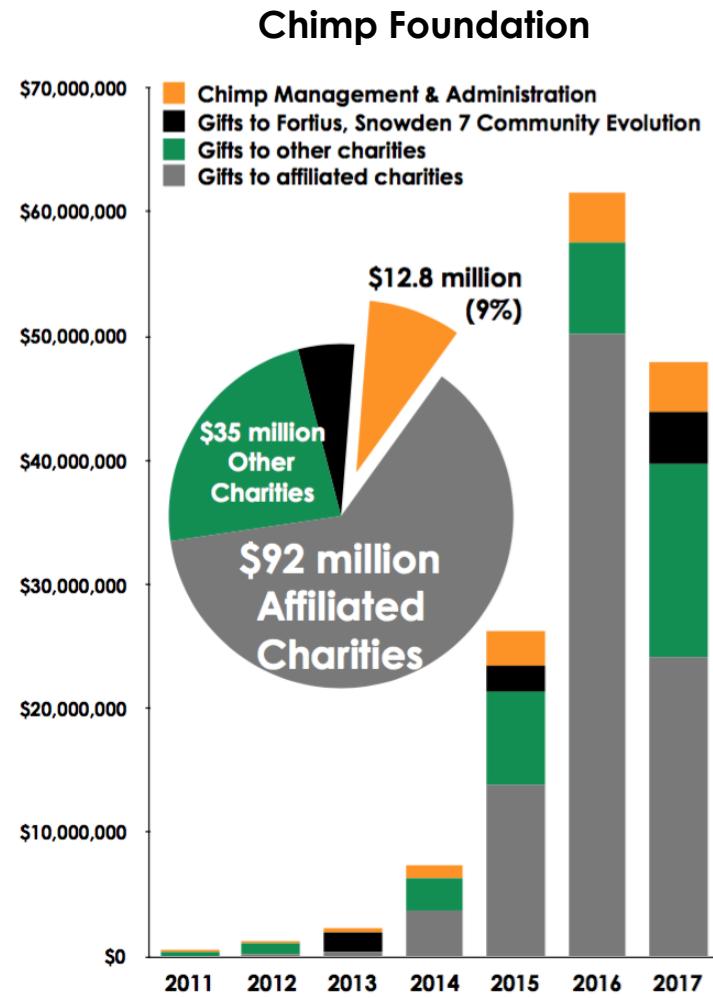
Only 9% of Chimp's total expenditures goes to management and administration, tax returns suggest.



Chimp's Overhead

But as this document has shown, roughly \$100 million of Chimp's revenue & expenditures is money that is circulated between Bromley charities. These amounts do not belong in an analysis of Chimp's charitable giving since, as discussed previously, the money doesn't exit the Bromley system to be actually spent on charity.

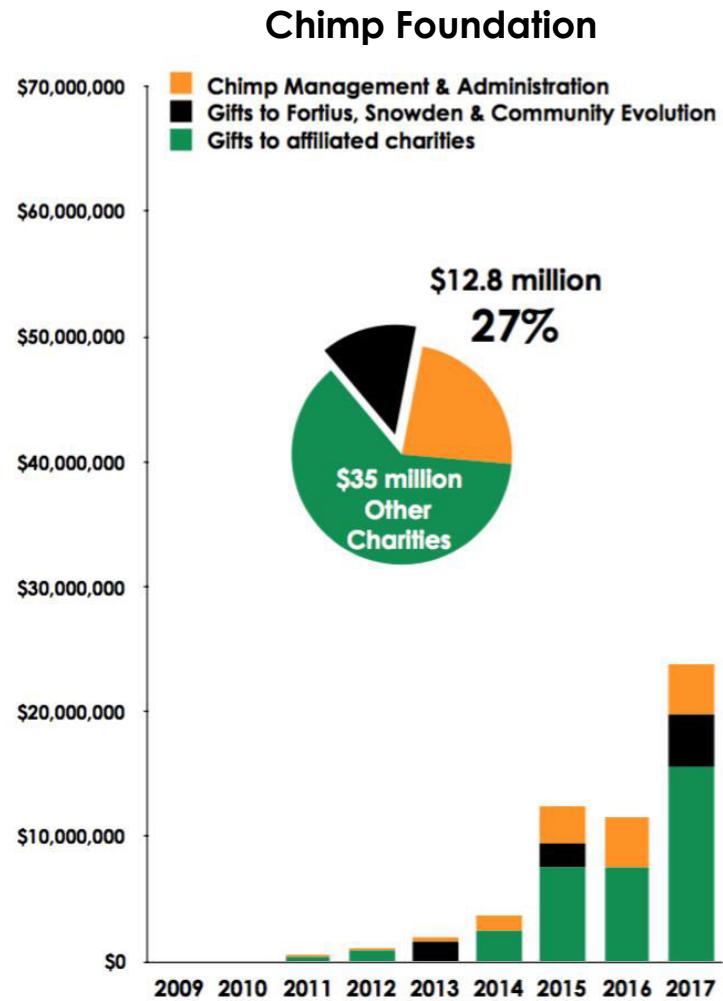
NOTE: The \$92 million does NOT include \$8 million granted to 3 charities: Fortius, Showden & Community Evolution. These three foundations are not considered "Bromley charities" because while they do have some common directors, they do not share Chimp's address. This \$8 million is shown as the black wedge in the figure to the right.



Chimp's Overhead

If the \$100 million paid to Bromley charities is not included, Chimp's grant-making isn't \$135 million, its \$35 million.

Likewise, Chimp's \$12.8 million overhead isn't 9 percent of total expenditures, its 27 percent.



Fees

Looking at the fees paid by Bromley charities, two things stand out:

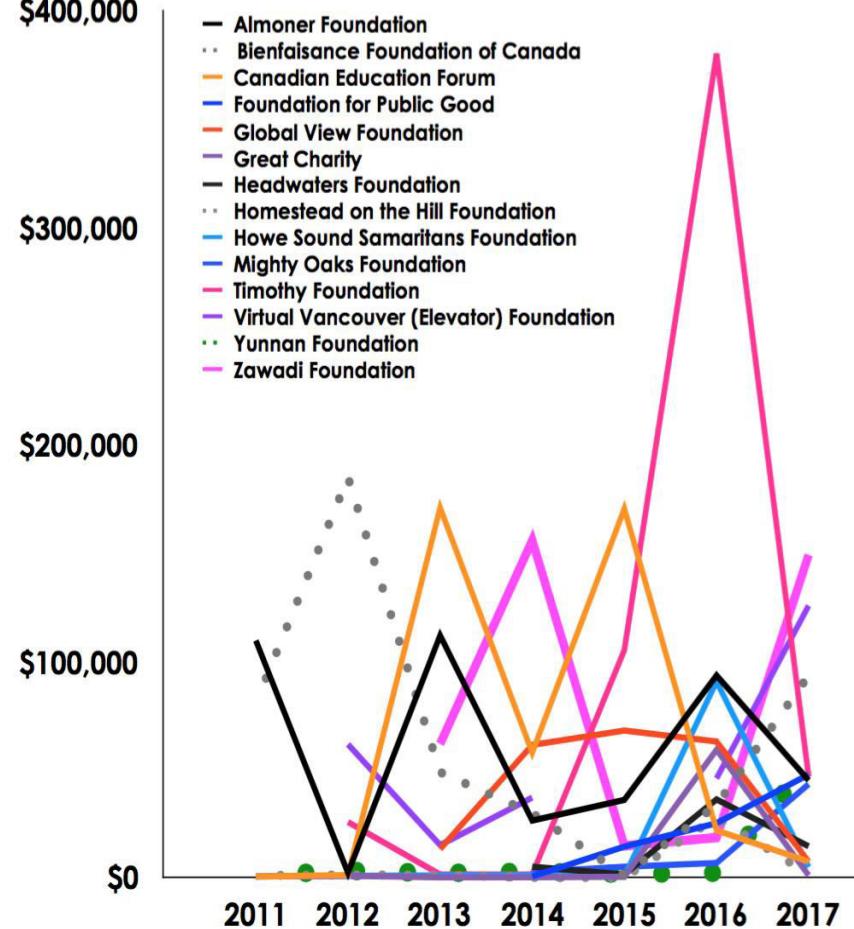
First: Some fees paid are very large (next page).

Second: The variation year to year is not what one would expect at a steady organization that is consistently running a charitable program.

The general pattern is low fees for most years but one high payment per charity over a five or six year period. For example:

- Great Charity never paid more than \$1,000 in fees except in 2016 when it paid \$58,978.
- Yunnan Foundation never paid more than \$5,000 per year in fees, then suddenly in 2017 it paid \$52,610.

Professional & Consulting Fees Paid by Bromley Charities



High Fees

2011	Global Charity Fund	Professional and consulting fees	4860	\$ 926,260
2012	Theanon Foundation	Professional and consulting fees	4860	\$ 1,230,308
2013	Philanthropy Without Frontiers	Professional and consulting fees	4860	\$ 423,430
2014	Association for the Advancement of Scholarship	Professional and consulting fees	4860	\$ 3,135,185
2015	Canadian Education Forum	Professional and consulting fees	4860	\$ 170,217
2016	Timothy Foundation	Professional and consulting fees	4860	\$ 380,154
2017	Eden Glen Foundation	Professional and consulting fees	4860	\$ 175,084
2017	Zawadi Foundation	Professional and consulting fees	4860	\$ 148,912
2017	Revelation Foundation	Professional and consulting fees	4860	\$ 65,478



Ahead, an example of fees paid relative to the amounts shuffled between Chimp and other Bromley charities.

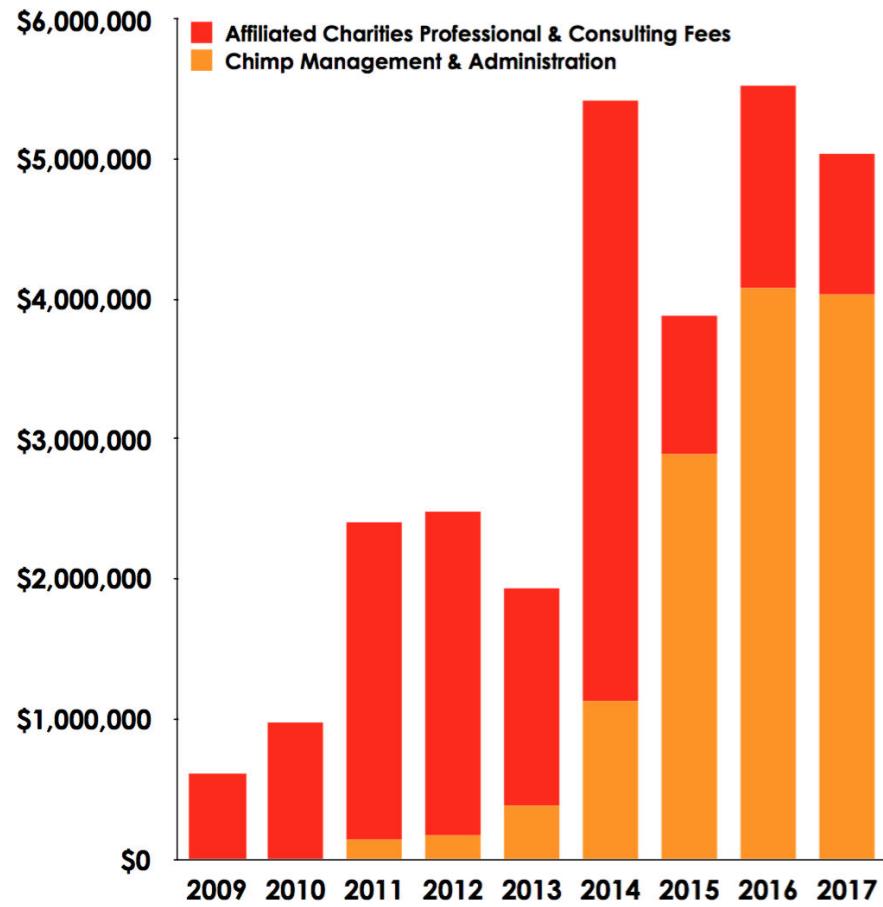
Fees Paid by Bromley Charities

While there is no steady trend in the amount of fees paid by Individual charities (previous slide), the amount paid by the Bromley charities as a whole shows a clear trend.

As Chimp Foundation got up and running, fees paid by the Bromley charities have decreased just as Chimp's spending on management and administration has increased steeply.

NOTE: The large spike in 2014 is due primarily to a payment of \$3.1 million by Association for the Advancement of Scholarship (previous page).

Overhead: Chimp & Bromley Charities



\$40 Million Shuffle; \$389K in Fees

In general, the highest fees are paid when a large amount goes from one Bromley charity to another. For example, in 2017 two charities transferred \$41 million into Chimp and other Bromley charities. Fees paid by the 3 charities in 2017 alone: \$389,474. (Eden Glen, Zawadi & Revelation Foundation).

Qualified donees — Eden Glen Foundation

3 Qualified donees

Qualified donee #1

Name of organization: Kildonan Foundation Society
Associated charity: No
Business number/Registration number: 118980705 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 15,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #2

Name of organization: Foundation for Public Good
Associated charity: No
Business number/Registration number: 852770601 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 100,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #3

Name of organization: CHIMP: Charitable Impact Foundation
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 10,500,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donees — Zawadi Foundation

3 Qualified donees

Qualified donee #1

Name of organization: Foundation for Public Good
Associated charity: No
Business number/Registration number: 852770601 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 110,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #2

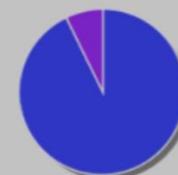
Name of organization: CHIMP Foundation
Associated charity: No
Business number/Registration number: 845528827 RR 0001
City: Vancouver
Province/Territory: BC
Amount of gifts in kind: \$ 0
Total amount of gifts: \$ 625,000
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

Qualified donee #3

Name of organization: Revelation Foundation
Associated charity: No
Business number/Registration number: 863561577 RR 0001
City: Vancouver
Province/Territory: BC
Error: Should read
Amount of gifts in kind: \$ 30,475
Total amount of gifts: \$ 30,475
\$30,475,000 not
\$30,475
Was any part of the gift intended for political activities? No
If yes, enter amount: \$ 0

REVELATION FOUNDATION

Revenue



■ Receipted donations (0%)

■ Non-receipted donations (0%)

■ Gifts from other charities \$29,545,000 (93%)

■ Government funding (0%)

■ All other revenue \$2,243,630 (7%)

Total revenue: \$31,788,630

Expenses



■ Charitable program \$0 (0%)

■ Management and administration \$65,501 (100%)

■ Fundraising (0%)

■ Political activities (0%)

■ Gifts to other registered charities and qualified donees (0%)

■ Other \$0 (0%)

Total expenses: \$65,501

Professional and consulting fees

\$65,478

Conclusions

So, how did Chimp grow so much so fast?

How did Chimp out-pace even Vancouver Foundation?

The answer: It didn't.

Considering the circular grantmaking in which Chimp has engaged, the dollar figures in Chimp's tax returns do not appear to be a true reflection of its revenue nor its spending for charitable purposes.



Conclusions (Cont'd)

One of the questions raised earlier was about why Chimp gives very large amounts to Bromley charities meanwhile thousands of other worthy organizations get insignificant amounts. Chimp Foundation and Blake Bromley were asked this question by e-mail. John Bromley replied as follows:

“For considered missional reasons, CHIMP Foundation chooses to be inclusive of all donors. As a result it does not impose minimums or maximums on grant recommendations made by its donors. Small donors often make small grant recommendations and large donors often make large grant recommendations.”

In the absence of a satisfactory explanation from Chimp, it does not stand to reason that Chimp gives thousands of tiny amounts is because it cannot afford larger amounts. In fact, Chimp has granted more than \$100 million to Bromley charities. Chimp has also paid \$12.8 million for overhead (including \$10 million to Chimp Technology Inc.). In addition to that, other Bromley charities have spent an additional \$13.9 million on fees.

By shuffling the \$100 million around and around, it appears that money has been spent for charitable purposes when, in fact, it hasn't. Perhaps the reason that Chimp hasn't given the \$100 million to outside charities is because the money doesn't actually exist.

Conclusions (Cont'd)

Whatever the true reason for the thousands of tiny gifts that Chimp has made, it is clear from the information and analysis presented here and in the accompanying documents, that the total assets, total revenue and total expenditures of Chimp Foundation have been greatly inflated by circular grant-making with other Bromley charities.

Chimp and other Bromley charities report more than \$600 million in tax-receipted donations. It does not appear that the dollar value of actual charitable activity funded by these charities is anywhere near the total amount that these charities report as tax-receipted revenue.

CRA needs to enforce the Income Tax Act *in a timely manner*. CRA audits must not take ten years.

Charities that do not operate *exclusively* for charitable purposes need to be shut down and CRA needs to ensure that within reason, tax-receipted donations are not issued in gross excess of the amount of charitable activity that is ultimately funded. This is particularly important when tax-receipted revenue is large, as in the case of the hundreds of millions of dollars reported by Chimp Foundation and other charities in the Bromley network.

Correspondence With Blake Bromley

In April of 2018, Blake Bromley, John Bromley and others involved with Benefic Group Inc. were sent an earlier draft of this document. Blake Bromley replied by letter, objecting strenuously to the gist of the conclusions and characterizing them as “inaccurate,” “unreliable,” and “seriously flawed.”* An excerpt of his letter is provided on the following page.

During September of 2018, Blake Bromley and John Bromley were sent e-mails with questions about the charities with which they are involved. The substantive questions have not yet been answered.

**October 1, 2018, Mr. Bromley was sent a draft of this document for comment/corrections. Mr. Bromley’s response, if any, will be posted at
http://fairquestions.typepad.com/rethink_campaigns/ and @FairQuestions.**

Ms. Vivian Krause.

Dear Ms. Krause:

Re: Monkey Business

Dear Vivian Krause:

"Monkey Business" contends that charity is not a civic virtue but a criminal conspiracy to cheat Canadian taxpayers. You accuse me and Benefic, my law firm, of being the ring leaders of that conspiracy. Much of the information in your article is inaccurate and unreliable. Your analysis is seriously flawed. Your opinions are not based on true facts.

Before you publish anything about me or my law firm, you should do basic research and learn how the charity sector works.

Let me start with the subject of "shell charities," a term which you apparently invented in order to demonize more than a score of legitimate charities which have made a valuable contribution to Canadian society and the welfare of many residents of this country. There is no such thing. In any event, no "shell charity" has ever been incorporated by me or by Benefic, my law firm.

In the last thirty years, I have been involved in the incorporation and registration of more than 650 registered charitable foundations and charitable organizations. In the first two decades, CRA quickly registered charitable foundations and seldom required changes in the wording of the registration documentation. Registration was almost invariably retroactive to the date of incorporation. In the last decade, however, CRA changed its policy and ceased making registration retroactive. Moreover, CRA now takes 6-8 months to register a simple charitable foundation.

The combined effect of ending retroactive registration and the new delays in registration forced accountants and lawyers to resort to creating fully-registered charitable foundations which would then be placed on the "shelf" awaiting transfer to a donor needing to complete a charitable donation – sometimes in the millions of dollars - before its impending fiscal year end. A decision to donate often develops quickly. For example, a company with a fiscal year end of December 31 might anticipate selling property in July which triggers a massive capital gain on completion in November. Any decision to make a multi-million dollar charitable donation to serve a special charitable cause is not prudently finalized until after the sale is actually completed. The donation must be complete and the tax receipt issued before December 31 in order to obtain the benefit of the tax deduction. One answer: acquire control of a "shelf" charitable foundation.

**The entire letter
and subsequent
correspondence
is available
upon request.**

Appendix A:

Stewart Blusson & Archon Minerals Inc.

Stewart Blusson & Archon Minerals

The largest share of the \$111 million that Chimp has received from Bromley charities can be traced to Association for the Advancement of Scholarship (AAS) and Global Charity Fund. These Bromley charities accounts for \$66 million paid to Chimp.

These two charities report a combined total of \$100 million tax-receipted donations that trace to Stewart Blusson, a pioneer in Canadian diamond mining.

The \$70 million gifted to Global Charity Fund was a non-cash, publicly-traded shares.¹

These two charities gave less than \$5 million to outside charities. Global Charity Fund is now closed and AAS has only \$4 million in assets.

	Tax-Receipted Donations (All Years)		Amount Paid to Chimp (2011 - 2017)		
	Cash	Non-cash	Directly	Indirectly Via Other Charities	Total
Association for the Advancement of Scholarship	\$30,000,000		\$11,400,000		\$11,400,000
Global Charity Fund		\$70,000,000	\$3,400,000	\$51,202,416	\$54,602,416
Global View Foundation	\$535,000	\$19,600,000	\$28,048,477		\$28,048,477
Theanon Foundation	\$62,544,043	\$16,734,451	\$1,101,000	\$13,052,488	\$14,153,488
Chimp Foundation	\$59,861,086	\$28,737,834		\$1,175,000	\$1,175,000
New Dimensions Foundation	\$17,785,500			\$1,010,000	\$1,010,000
Paraklesis Foundation & Other affiliated charities	\$11,471,000	\$2,904,000	\$1,181,169		\$1,181,169
Total:	\$182,196,629	\$137,976,285	\$45,130,646	\$66,439,904	\$111,570,550

NOTE: Amounts highlighted in grey are non-cash.

If the \$100 million was real, why didn't they give it away? Or invest it?

\$200 Million

According to CRA documents, the total amount of tax-receipted donations from Stewart Blusson to Bromley charities appears to be \$200 million. (See next two pages).

As of 2017, Blusson Foundation's total assets were a mere \$30 plus about \$5.4 million in accounts receivable from non-arms length parties. This means that Blusson Foundation's assets are gone.

Cash, bank accounts, and short-term investments	4100	\$ 30
Amounts receivable from non-arm's length persons	4110	\$ 5,423,540

Stewart and Marilyn Blusson have made significant gifts, including \$50 million to UBC in the 1990s and \$32 million to Quest University in 2002. Blusson also funded UBC's Quantum Matter Institute.

But does Stewart Blusson's charitable giving sum to \$200 million since 2000?

Source: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form23sched6-eng.action?b=868875949RR0001&fpe=2017-11-30&n=STEWART%26+MARILYN+BLUSSON+FOUNDATION>

Source: <https://www.theglobeandmail.com/technology/science/x-marks-the-spotlight-for-elusive-benefactor/article1107687/>

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

In early correspondence relating to the revocation of Theanon Foundation, CRA argued that Theanon Foundation had engaged in transactions "to avoid certain provisions of the (Income Tax) Act and taxes otherwise payable. It is obvious that this refers to transactions involving a tax-receipted non-cash gift from Archon Minerals, Stewart Blusson's mining company:

It is our view that Organization issued significant donation receipts for the following transactions even though they lacked the requisite donative intent of a gift at law:

- Receipt # P-027 to [REDACTED] for **Archon** shares at \$30,520,910
- Receipt # P-036 to 570129 BC Ltd. for farm assets at \$2,020,000
- Receipt # P-037 to [REDACTED] for farm assets at \$1,154,440

As explained previously, it is our position that the primary purpose of the donor in each case was not to enrich the Organization or the other participating charities but, through a series of transactions, **to avoid certain provisions of the Act and taxes otherwise payable.** As outlined above, these transactions were pre-arranged by the donor, as the Organization merely acted as a conduit to issue donation receipts and funnel cash and tax-receipted property to achieve the desired tax effects. In each case, the financial positions of the Organization and other charities involved did not improve by nearly as much as the tax-receipted amount, if at all. At best, the Organization was lending its tax-receipting privilege for a fee.

NOTE: Black areas redacted by CRA. Text in white and yellow has been added.

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

On the contrary, it is our view that the arrangement conferred significant benefits on **Mr. Blusson** and persons related to **him**. We note that, as a result of the transactions in the arrangement, **Mr. Blusson** received a donation receipt of \$30,520,910 from the Organization for the **Archon** shares **but ultimately retained possession of this property**. While **Mr. Blusson** re-acquired the **Archon** shares from **HSEF** with the royalty interest, the Blusson Foundation subsequently received the royalty interest with no consideration. Furthermore, **Mr. Blusson** would only have to report 25% of the capital gains from the disposition of the **Archon** shares to the Organization because of its status as a public foundation⁴. Yet, by acquiring them back, the ACB of the shares has been increased to \$31,324,092. Finally, it is our view that another purpose of the arrangement was to avoid the application of the "loanback" provision under subsection 118.1(16) of the Act. Our records indicated that the [REDACTED] used the royalty interest as consideration to acquire 27,500 Class B non-voting shares of **Nor West Rotors Ltd.** (**Nor West** shares) from the [REDACTED] on December 31, 2005. The [REDACTED] shares are considered non-qualifying securities (NQS) of [REDACTED] immediately after that time, as [REDACTED] owns 100% of the common shares of **Nor West Rotors Ltd.** Therefore, if **Blusson** had received a donation receipt

NOTE: Black areas redacted by CRA. Text in white and yellow has been added.

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

(from the previous page)

- 7 -

directly from the **Global Charity Fund** within 5 years before December 31, 2005, the amount of the donation receipt would have to be reduced by the fair-market value of the [REDACTED] shares under subsection 118.1(16) of the Act. However, the arrangement was structured to avoid this provision by having the Organization issue the donation receipt for the **Archon** shares and later substitute the **Archon** shares with the royalty interest, which was not tax-receipted, before the latter was transferred to the **Global Charity Fund**. Accordingly, the arrangement would have conferred significant tax savings on **S. Blusson** by preventing the application of subsection 118.1(16) of the Act.

It is our view that the Organization participated in this arrangement to confer undue private benefits on an individual while helping another charity circumvent certain provisions of the Act. It is therefore our position that the Organization did not operate exclusively for charitable purposes.

NOTE: Black area redacted by CRA. Text in yellow has been added.

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

SUMMARY OF TRANSFER OF SHARES OF NOR-WEST ROTORS LTD.

Parties Involved

[REDACTED] ([REDACTED]) is a private corporation incorporated [REDACTED] under the [REDACTED]. It was struck from the corporate register [REDACTED] but restored [REDACTED] owns 100% of the Class A voting, non-participating shares of the company and as such controls the company. On December 28, 2005 200,000 Class B non-voting, participating shares of the company were issued to [REDACTED] at an issue price of \$200,000,000. There are no other issued shares of this company.

1) ("mining interest") – [REDACTED] had a 10% participating interest in the [REDACTED]. The interest is described as all of [REDACTED] right, title and interest in and to the [REDACTED] and the assets used in the [REDACTED] described in the [REDACTED] made between [REDACTED] and dated effective [REDACTED]

On the same date as the 200,000 Class B shares were issued, [REDACTED] purchased [REDACTED] mining interest in the [REDACTED] and all assets used in the [REDACTED]. According to the notes to the [REDACTED] financial statements, the fmv of the assets received by [REDACTED] was equal to the issue price of the Class B shares.

2) ("buffer zone") – [REDACTED] owned a participating interest in the buffer zone joint venture which has mineral claims in the [REDACTED]. By agreement dated [REDACTED] the buffer zone was sold to [REDACTED]. Consideration for the acquisition was the issuance of 40,000,000 common shares of [REDACTED] at a deemed value of \$70,000,000 (\$1.75 per share).

3) ("royalty interest") – [REDACTED] owned all the rights and interest in and to a royalty interest, including all payments due to [REDACTED] in respect of mining operations in the area known as [REDACTED].

On July 1, 2005 the royalty interest was sold to [REDACTED] for \$31,300,000 in exchange for a promissory note.

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

Blake Bromley – [REDACTED] of [REDACTED], a [REDACTED]
[REDACTED] Blake Bromley, [REDACTED] and director of at least one of the charities involved
in the share transactions, worked with [REDACTED] and other legal representatives to
implement the plan.

Facts and Assumptions

December 28, 2005

[REDACTED] transferred his 10% participating interest in the [REDACTED] (mining interest) to
[REDACTED] ([REDACTED]).

Consideration for mining interest is 200,000 Class B non-voting participating shares of [REDACTED]
[REDACTED] (issue price of \$200 million @ \$1,000 per share). The stated fair market value of the
mining interest is \$200 million although no valuation was available to support the FMV as
reported.

On the same date, as part of a series of transactions, [REDACTED] donated 110,000 Class B
shares to four different registered charities as follows:

Registered Charities	# of Donated Shares of [REDACTED]
Sea to Sky Foundation	65,000
Association for the Advancement of Scholarship	30,000
[REDACTED]	10,000
[REDACTED]	5,000
Total	110,000

NOTE: Black area redacted by CRA. Text in yellow has been added.

Excerpts of the CRA's Letter of Revocation of Theanon Foundation

Ultimately, after nearly ten years of back and forth between Blake Bromley and CRA, CRA decided not revoke the charitable status of Theanon Foundation because of transactions involving shares in Stewart Blusson's mining companies. Here's an excerpt to this effect from CRA correspondence dated March 15, 2013:

We accept the Organization's representations with respect to the donation of Archon shares and will not rely on the arguments outlined in our previous letter as grounds for revocation.

As the excerpts on previous pages show, CRA had found that Theanon Foundation had issued donation receipts for gifts that lacked the requisite intent of a gift at law, and that one of these gifts was the \$30.5 million in Archon shares. CRA found that this was a pre-arranged series of transactions to "funnel cash" and achieve particular tax effects. CRA also found that ultimately, Stewart Blusson had "retained possession" of the \$30.4 million for which he received a tax receipt.

Why then did CRA decide not to revoke Theanon's charitable status for these reasons?

Tax Return of Theanon Foundation (2002)

Gifts and grants received this fiscal period

Total tax-receipted gifts	100	\$ 30,560,060
Portion of the amount on line 100 that was received from other registered charities	101	
Total other gifts	102	\$ 48,750
Portion of the amount on line 102 that was received from other registered charities	103	\$ 48,750

Tax Return of HSEF Renaissance Academy (2002)

Assets		
Cash on hand and in bank accounts	051	
Amounts receivable from founders, directors/trustees, employees, members, or individuals and organizations not at arm's length to them	052	
Amounts receivable from others	053	
Other investments	054	\$ 0
Fixed assets and inventory used in charitable programs	055	\$ 30,520,910
Other fixed assets and inventory	056	
Other assets	057	
Total assets (add lines 051 to 057)	058	\$ 30,520,910
Fixed assets and inventory used in charitable programs	055	\$ 30,520,910
Gifts and grants received this fiscal period		
Total tax-receipted gifts	100	
Portion of the amount on line 100 that was received from other registered charities	101	
Total other gifts	102	\$ 30,520,910
Portion of the amount on line 102 that was received from other registered charities	103	\$ 30,520,910
Total amounts received from all sources (add lines 100, 102, and 108 to 117)	118	\$ 30,520,910

Transfer from HSEF Renaissance Academy to Blusson Foundation (2005)

From the 2005 tax return of HSEF Renaissance Academy:

Interest and bank charges	4820	\$ 2,675,357
Professional and consulting fees	4860	\$ 20,841
Total specified gifts to qualified donees	5070	\$ 31,300,000
Total expenditures (add lines 4950, 5050, 5060 and 5070)	5100	\$ 33,996,198

From the 2005 tax return of Stewart and Marilyn Blusson Foundation:

Summary of revenue		
Description of revenue	Line number	Amount
Total eligible amount of tax-receipted gifts	4500	n/a
Total amount received from other registered charities	4510	\$ 31,300,000
Total specified gifts included in line 4510	4520	\$ 31,300,000

Sources: Top: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form19-eng.action?b=885205427RR0001&fpe=2005-11-30&n=HSEF+RENAISSANCE+ACADEMY> Bottom: <https://apps.cra-arc.gc.ca/ebci/haip/srch/t3010form19-eng.action?b=868875949RR0001&fpe=2005-11-30&n=STEWART+%26+MARILYN+BLUSSON+FOUNDATION>

Appendix B:

**Excerpts from Chimp Foundation
Financial Statements
Showing Payments to
Chimp Technology Inc.**

2013

Related Party Balances

During the year, the Foundation paid the following amounts to related parties:

- (a) Technology services of \$158,540 (2012 - \$81,429) to CHIMP Technologies Inc., a company in which a director of the Foundation has an equity interest.

2014

Related party balances

During the year, the Foundation paid for technology services of \$681,701 (2013 - \$158,540) to CHIMP Technologies Inc., a company in which an executive of the Foundation has an equity interest. This transaction was in the normal course of operations and is measured at the exchange amount, which is the amount of consideration established and agreed upon by the related parties.

2015

Related party balances

During the year, the Foundation paid for technology services of \$1,544,914 (2014 - \$681,701) and human resource services of \$1,028,255 (2014 - \$Nil) to CHIMP Technologies Inc., a company in which an executive of the Foundation has an equity interest. This transaction was in the normal course of operations and is measured at the exchange amount, which is the amount of consideration established and agreed upon by the related parties.

Sources:

2013: http://s3.amazonaws.com/chimp-brand-assets/financial/ChimpFoundation_AuditedFinancialStatements_2013.pdf

2014: http://s3.amazonaws.com/chimp-brand-assets/financial/ChimpFoundation_AuditedFinancialStatements_2014.pdf

2015: http://s3.amazonaws.com/chimp-brand-assets/financial/ChimpFoundation_AuditedFinancialStatements_2015.pdf

2016

Related party balances

During the year, the Foundation paid for technology services of \$2,145,668 (2015 - \$1,544,914) and human resource services of \$1,428,054 (2015 - \$1,028,255) to CHIMP Technologies Inc., a company in which an executive of the Foundation has an equity interest. This transaction was in the normal course of operations and is measured at the exchange amount, which is the amount of consideration established and agreed upon by the related parties.

Contractually, the Technology Service Provider Agreement and Human Resource Service Provider Agreement between the Foundation and CHIMP Technologies Inc. does not permit the Foundation to pay CHIMP Technologies Inc. for services with money given to or held in accounts at CHIMP (donor advised funds).

2017

Related party balances

The Foundation board focuses extensively on strategy, governance, compliance and risk management working with aligned third parties to optimize management of its operations. During the year, the Foundation acquired technology transaction services of \$2,091,745 (2016 - \$2,145,668) and human resource and business services of \$1,392,394 (2016 - \$1,428,054) from CHIMP Technology Inc., a company in which an unpaid executive of the Foundation has an equity interest. All services were acquired in the normal course of operations and measured at the exchange amount, which is the amount of consideration established and agreed upon by the parties.

Contractually, all agreements between the Foundation and CHIMP Technology Inc. do not permit or require the Foundation to pay CHIMP Technology Inc. for services with funds donated to or held in donor advised funds. Donor advised funds with the Foundation are protected from financial liability that could arise as a result of the Foundation's relationship with CHIMP Technology Inc.

Sources:

- 2016: http://s3.amazonaws.com/chimp-brand-assets/financial/ChimpFoundation_AuditedFinancialStatements_2016.pdf
2017: http://s3.amazonaws.com/chimp-brand-assets/financial/ChimpFoundation_AuditedFinancialStatements_2017.pdf

About The Author

Vivian Krause is a Canadian researcher and writer who has written a series of groundbreaking articles about the funding of environmental and elections activism, published in The Financial Post and elsewhere. Drawing on her work with the United Nations, her work as a director of a Canadian registered charity and her experience with resource-based industries, Vivian has an understanding of both charity and activism. She has been invited to testify to Standing Committees of The House of Commons & The Senate of Canada. Her testimony and articles in The Financial Post prompted an investigation by Elections Canada and a series of audits of the political activity of charities by the Canada Revenue Agency. Of the 42 audited charities, 41 were non-compliant to some degree, the CRA reported in December of 2016.¹

Vivian has a Science degree in Nutrition from McGill University and a Masters of Science from the Université de Montréal. During the 1990s, she worked on diabetes with Algonquin people in northern Quebec before joining the United Nations to work in Guatemala (1990 – 1995) and Indonesia (1996 - 2000). Upon returning to Canada, Vivian worked in salmon farming (2002 - 2003). She has served as a volunteer director of the Adoptive Families Association of B.C. (2005 – 2013).

On Twitter, Vivian is @FairQuestions

¹ <http://www.cra-arc.gc.ca/chrts-qvng/chrts/bt/nnlrprt/2015/Charities%20AR.eng.pdf>

