

April 28, 2020

To: John Bromley, President & CEO of Charitable Impact Foundation ("CHIMP")

c.c. Blake Bromley
Christopher Richardson
Leslie Brandlmayr
Victoria Nalugwa
Nadine Britton

c.c. Neil Bunker, PricewaterhouseCoopers LLP
Dr. George Iwama, President, Quest University
Mr. Jordan Sturdy, MLA, West Vancouver-Sea to Sky

RE: Quest University, CHIMP and other Bromley Charities

Further to my letter of April 21, I am writing again to inquire about the role of CHIMP and other Bromley Charities in the early funding and start-up of Quest University.

Last week, I asked to speak with you about gifts to CHIMP for a total of \$120 million:

- \$ 34.4 million from Almoner Foundation (2011-2019)
 - \$ 33.8 million from Foundation For Public Good (2017-2019)
 - \$ 12.1 million from the Association for the Advancement of Scholarship (2012-2018)
 - \$ 10.5 million from Eden Glen Foundation (2017)
 - \$ 10.1 million from Timothy Foundation (2012-2017)
 - \$ 7.0 million from Mighty Oaks Foundation (2014)
 - \$ 4.0 million from Headwaters Foundation (2011)
 - \$ 3.7 million from Homestead on the Hill Foundation (2018)
 - \$ 3.4 million from Global Charity Fund (2014)
 - \$ 1.0 million from Theanon Foundation (2011-2014)
- \$ 120 million TOTAL**

On the basis of my research, it is clear to me that these gifts for \$120 million stem from tax-receipted donations reported by charities involved with funds for starting Quest University.

Put plainly, instead of going to Quest, more than \$120 million has gone to CHIMP. However, this is not readily apparent in CHIMP's financial statements nor its tax returns.

Analysis of 11,650 Gifts For \$244 Million

Attached, please find my analysis of roughly 11,650 gifts made by CHIMP (2011-2018) for a total of \$244 million. Main findings:

- CHIMP made 9,000 very small gifts (<\$1,000) for a total of \$1.5 million (2011-2018).
- CHIMP made 20 very large gifts to Bromley Charities for nearly \$200 million (Table 1).

Put simply, a very large majority of CHIMP's giving is accounted for by a very small number of huge gifts to Bromley Charities. These gifts would stick out like a sore thumb in CHIMP's tax returns were it not for the thousands of very tiny gifts that CHIMP has also made. More than 2,500 of CHIMP's gifts were for less than \$25 each (Table 2). These tiny gifts account for the lion's share of the number of CHIMP's gifts – but not their value. In fact, three quarters of all the gifts made by CHIMP account for a mere 0.6 percent of their total value.

No doubt about it, CHIMP has funded thousands of legitimate charities across Canada. For example, CHIMP sent gifts to The Missing Children's Society, Addictions and Mental Health Ontario, and The HIV Network of Edmonton. However, these charities got only \$4 each. The Toronto Rape Crisis Centre got \$9.

In 2019, the same year that your registered charity paid \$12 million to your private company (Chimp Technology Inc.), your charity continued to make very tiny gifts. For example, The Autism Resource Centre in New Brunswick and Avalanche Canada were both sent \$4.

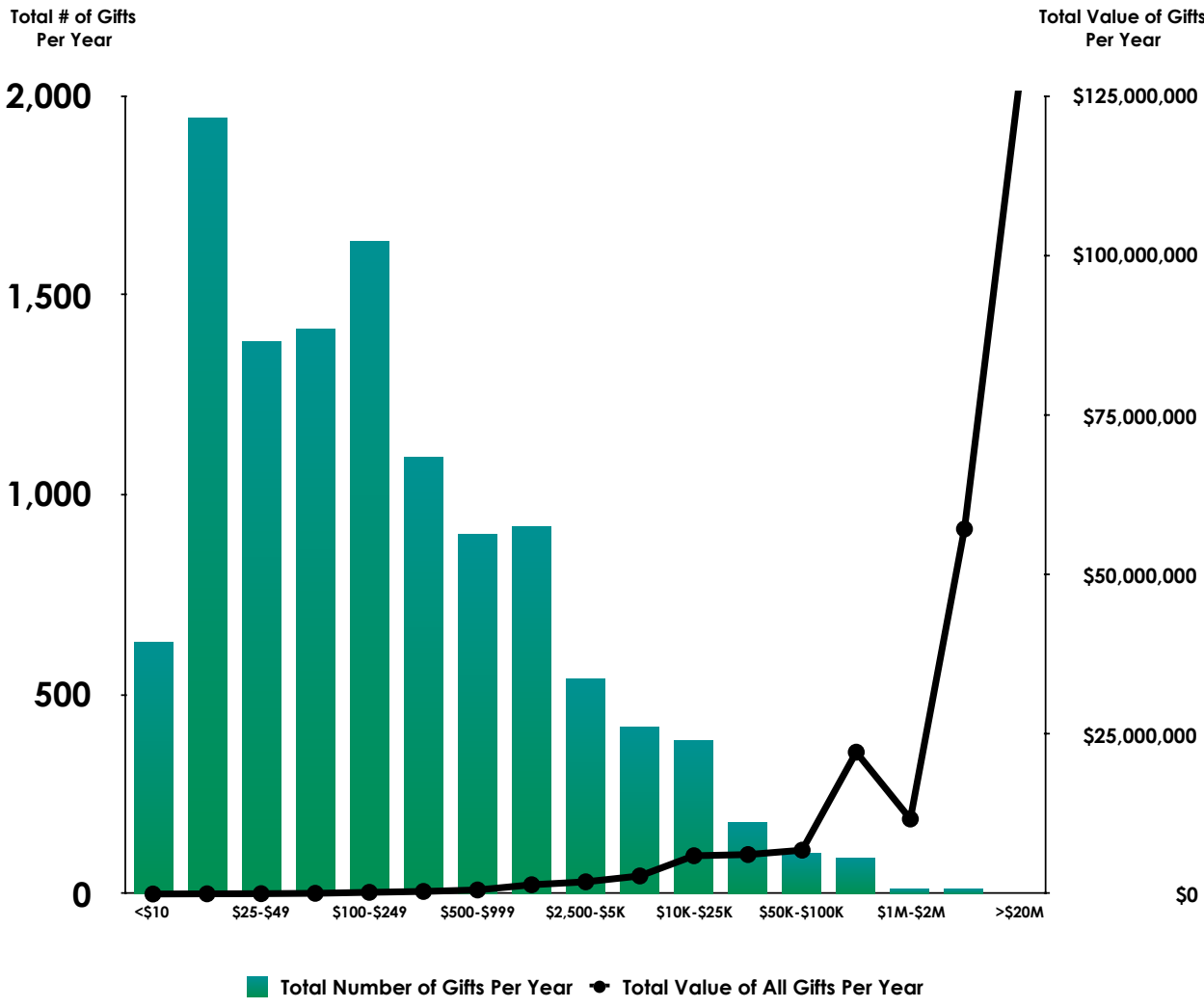
I do not see a good reason why CHIMP would send such tiny gifts to THOUSANDS of charities over the same years that CHIMP had the money to pay \$200 million to Bromley Charities and \$23 million to your company (Table 3). I do see how the thousands of tiny gifts on which CHIMP has spent a few million may have been a way to create cover for the payment of \$23 million to your private company, and to obscure the fact that CHIMP received at least \$120 million that could have gone to Quest University.

Please contact me to explain. If I don't hear from you this week, I will assume that you do not dispute nor refute any of the concerns, opinions and questions that I have presented.

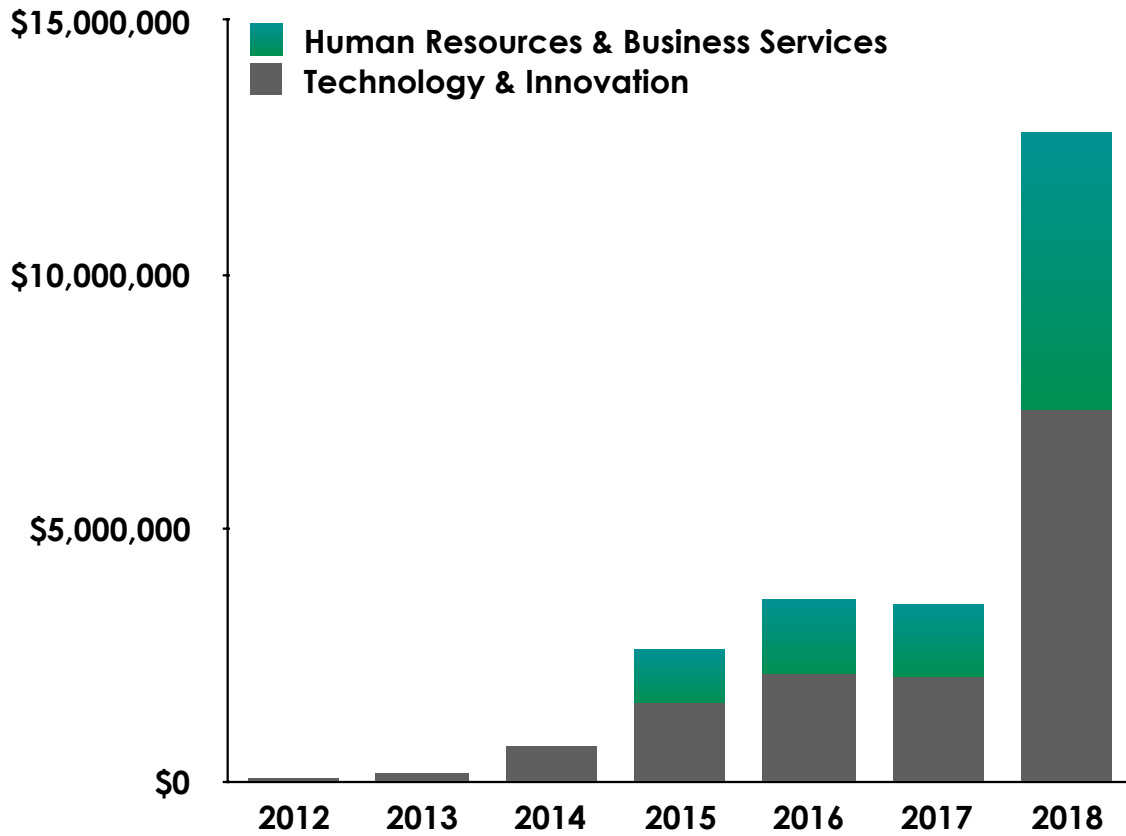
Sincerely,
Vivian

Vivian Krause
@FairQuestions

Gifts Made by Charitable Impact Foundation (“CHIMP”) (2011-2018)



**Amounts Paid to Chimp Technology Inc.
From Charitable Impact Foundation:
\$23 Million (2014-2018)**



Source: Compiled from the financial statements of Chimp Foundation.

Table 1. Charitable Impact Foundation (“CHIMP”): Top 20 Gifts (2011-2018)

Recipient Organization			Year	Amount	Bromley Charities	Other Charities
1	Fortius Foundation	Public Foundation	2018	\$74,711,535	\$74,711,535	
2	Zawadi Foundation	Public Foundation	2016	\$30,475,000	\$30,475,000	
3	Vanchorverve Foundation	Public Foundation	2018	\$20,791,405	\$20,791,405	
4	Viva Voce Charitable Foundation	Private Foundation	2017	\$14,614,210	\$14,614,210	
5	Foundation for Public Good	Public Foundation	2016	\$9,850,000	\$9,850,000	
6	Viva Voce Charitable Foundation	Private Foundation	2018	\$8,610,541	\$8,610,541	
7	Paraklesis Foundation	Public Foundation	2015	\$5,888,009	\$5,888,009	
8	Foundation for Public Good	Public Foundation	2015	\$4,900,000	\$4,900,000	
9	A Cappella Foundation	Public Foundation	2017	\$4,349,975	\$4,349,975	
10	Snowdon Foundation	Private Foundation	2017	\$4,182,931	\$4,182,931	
11	Global View Foundation	Public Foundation	2016	\$3,619,975	\$3,619,975	
12	Donald & Julia Leung Foundation	Private Foundation	2018	\$3,500,000	\$3,500,000	
13	Foundation For Public Good	Public Foundation	2017	\$3,319,985	\$3,319,985	
14	Virtual Vancouver Foundation	Public Foundation	2017	\$3,074,999	\$3,074,999	
15	Community Evolution	Public Foundation	2015	\$2,031,081	\$2,031,081	
16	Imladris Foundation	Public Foundation	2016	\$2,000,000	\$2,000,000	
17	Maple Syrup Mafia Foundation	Public Foundation	2015	\$1,781,999	\$1,781,999	
18	Fortius Foundation	Public Foundation	2013	\$1,551,375	\$1,551,375	
19	Youth With A Mission Foundation	Public Foundation	2018	\$1,371,845		\$1,371,845
20	VGH & UBC Hospital Foundation	Public Foundation	2018	\$1,247,869		\$1,247,869
Total Amount of Top 20 Gifts (2011-2018):				\$201,872,734	\$199,253,020	\$2,619,714
Percentage of Top 20 Gifts Accounted for by Bromley Charities:				99%		
Total Gifts to Qualified Donees (Line 5050 of tax returns, 2011-2018):				\$266,249,298		
Top 18 Gifts to Bromley Charities as a Percentage of Total Gifts from Charitable Impact Foundation (2011-2018):				75%		
Source: Compiled from Canadian tax returns.						
April 28, 2020.						
@FairQuestions						

Table 2. An Analysis of Gifts Made by Charitable Impact Foundation (“CHIMP”) (2011-2018)

Amount of Gift	# of Gifts	Total Value of Gifts	# of Gifts		Total Value of Gifts	
<\$10	627	\$4,909	8,997	77%	\$1,520,656	0.6%
\$10-\$24	1,945	\$34,050				
\$25-\$49	1,381	\$58,390				
\$50-\$99	1,417	\$113,279				
\$100-\$249	1,631	\$266,394				
\$250-\$499	1,093	\$406,596				
\$500-\$999	903	\$637,038				
\$1K-\$2,499	919	\$1,451,098	2,636	23%	\$47,421,805	19%
\$2,500-\$5K	538	\$1,909,893				
\$5K-\$10K	418	\$2,828,693				
\$10K-\$25K	386	\$5,992,285				
\$25K-\$50K	182	\$6,175,852				
\$50K-\$100K	103	\$6,865,194				
\$100K- \$1M	90	\$22,198,790	23	0.2%	\$194,842,206	80%
\$1M-\$2M	12	\$11,741,646				
\$2M-\$20M	9	\$57,122,620				
>\$20M	2	\$125,977,940				
Total:	11,656	\$243,784,667	11,656	100%	\$243,784,667	100%

NOTE: This table does not include gifts made in 2015 because complete data for 2015 is not currently available.

Source: Compiled from information provided by Canada Revenue Agency

Last updated: April 28, 2020.

@FairQuestions

Table 3. Amounts Paid to Chimp Technology Inc.: \$23 Million (2014 - 2018)

		2012	2013	2014	2015	2016	2017	2018	2019	2012-2018
Amounts paid by Chimp Foundation to Chimp Technologies	Technology Transaction Services:	\$81,429	\$158,540	\$681,701	\$1,544,914	\$2,145,668	\$2,091,745	\$7,302,041	n/a	\$14,006,038
	Human Resources & Business Services:				\$1,028,255	\$1,428,054	\$1,392,394	\$5,471,956	n/a	\$9,320,659
	Total:	\$81,429	\$158,540	\$681,701	\$2,573,169	\$3,573,722	\$3,484,139	\$12,773,997	n/a	\$23,326,697
Amounts Reported in Tax Returns For Chimp Foundation	Professional & Consulting fees (Line 4860):				\$91,945	\$260,814	\$196,113	\$317,248	\$394,116	\$866,120
	Licences, Memberships & Dues (Line 4830):				\$2,573,169	\$2,145,668	\$2,091,745	\$7,302,041	\$7,202,359	\$14,112,623
	All Other Expenditures (Line 4920):				\$72,973	\$1,487,451	\$1,509,466	\$6,588,014	\$3,219,095	\$9,657,904
	Total:				\$2,738,087	\$3,893,933	\$3,797,324	\$14,207,303	\$10,815,570	\$24,636,647
Total Paid to Chimp Tech Inc. for Human Resources & Business Services (2016-2018):						\$8,292,404				
Total Reported by Chimp Foundation for "All Other Expenditures" (Line 4920, 2016-2018):						\$9,584,931				
Percentage of All Other Expenditures Spent Paid to Chimp Tech Inc. for Human Resources & Business Services:						87%				
<p>Summary: This table clearly shows that payments to Chimp Technology Inc. were NOT reported on Line 4860 as professional and consulting fees. This table also shows that the amounts paid to Chimp Tech Inc. via Chimp Foundation were reported on Lines 4830 and 4920 of Canadian tax returns. For 2015, the \$2,573,169 paid to Chimp Technology Inc. was reported entirely on Line 4830. For 2016, 2017 and 2018, the amount paid to Chimp Technology Inc. was split between Lines 4830 and 4920. Technology Transaction Services were reported on Line 4830. Payment for Human Resources & Business Services accounted for 87 percent of the total that Chimp Foundation reported as "All Other Expenditures" on Line 4920 during 2016, 2017 and 2018.</p>										
<p>Conclusion: Questions need to be asked about whether the payment of \$23 million to Chimp Technology Inc. via Chimp Foundation constitutes a proper or an improper expenditure, and whether these payments are to some degree an undue benefit provided to a person related to the charity.</p>										
<p>NOTE: For 2019, financial statements for Chimp Foundation are not yet publicly available.</p>										
<p>Source: Compiled from the financial statements of Chimp Foundation and the publicly available tax returns for Chimp Foundation.</p>										
<p>Last updated: April 28, 2020.</p>										
<p>@FairQuestions</p>										