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Summary of reasons for revocation — Escarpment Biosphere Foundation, Inc.

Our audit revealed that the Escarpment Biosphere Foundation Inc. (the Organization) received cash and property with a purported value of over \$407 million as a result of its participating in the Canadian Humanitarian Trust tax shelter gifting arrangement (Donation Program). It is our position the Organization failed to verify the value of the properties and to maintain direction and control over the distribution of the properties. Further, we believe the Organization agreed, for an approximately a \$1 million fee, to lend legitimacy to the Donation Program by representing that it has received and distributed the properties in its own charitable programs. As such, it is our position the Organization failed to operate exclusively for charitable purposes by acting as a conduit for the Donation Program.

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