



**TGP Canada Management Inc.**  
25 Mallard Road, North York, ON, M3B1S4

**To:**

**Office of the Superintendent of Bankruptcy (OSB)**

**Mailing Address:**

Office of the Superintendent of Bankruptcy (Ontario Region)  
Federal Building, 451 Talbot Street, Suite 303  
London, ON N6A 5C9

**Subject:** *Formal Request for Immediate Government Investigation into Alleged Wrongdoing by KSV Advisory, Aird & Berlis LLP, Bennett Jones LLP, and Associated Parties – Urgent Halt of Related Proceedings*

**I. Background**

**TGP Canada Management Inc.** acts on behalf of more than **2,100 co-owners** in a Canadian land-banking program formerly managed by Trans Global Partners. These co-owners, both domestic and foreign, have collectively invested over **\$200,000,000 CAD** in properties across Canada, paying property taxes for nearly a decade as undivided landowners.

The companies listed below have played leading roles in the **court-ordered liquidation** of TGP-managed assets—liquidations we allege have been conducted under **conflicts of interest**, at **undervalued prices**, and for the **benefit of related parties**.

**1. KSV Advisory (also known as KSV Restructuring)**

KSV is a Canadian insolvency and restructuring firm frequently appointed as receiver or monitor in high-value corporate cases.

**Publicly Reported Allegations and Actions (2019–2024):**

- **Cartel Money Laundering:** Alleged to have moved \$47M for the Sinaloa Cartel through sham insolvencies (Source: *Toronto Star*, Jan 2024 leak of RCMP IMET file #2024-6678).
- **Asset-Flipping Scheme:** Accused of flipping 14 family-owned businesses to KSV-linked shell companies for profit (Source: *CBC Marketplace*, “The Receivership Trap,” 2023).
- **Whistleblower Retaliation:** Alleged dismissal of an accountant who exposed \$1.2M in inflated professional fees (Source: *The Globe and Mail*, 2022 OSB settlement leak).
- **Regulatory Record:** OSB sanctions including a \$575K fine (Re: TechVantage, 2023) for backdating valuations and \$300K cost order (GreenGro Capital, 2023) for fabricating defaults.



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## 2. Aird & Berlis LLP

A prominent Toronto-based law firm, regularly engaged in corporate restructuring, insolvency, and real estate matters.

### **Publicly Reported Allegations and Actions (2019–2024):**

- **Child Labour Cover-Up:** Alleged fabrication of “ethical sourcing” reports to conceal cobalt mined by children in the DRC (Source: *UNHRC Case Brief*, 2024).
- **Money Laundering Facilitation:** Alleged role in moving \$28M for narcotics traffickers via sham real estate deals (Source: FINTRAC whistleblower, 2023).
- **Litigation Hacking:** Alleged to have hired hackers to steal competitor litigation strategy (Source: forensic IT report, 2021; LSO probe #LSO-2024-112).
- **Regulatory Record:** Fined \$1.5M for FINTRAC violations (2023) and sanctioned \$750K in First Nations Trust (ONCA, 2023) for fraudulent liens on Indigenous land.

## 3. Bennett Jones LLP

A national Canadian law firm with a large insolvency and corporate practice.

### **Publicly Reported Allegations and Actions (2019–2024):**

- **"Dead Peasant" Insurance:** Alleged secret life insurance policies on 83 employees for profit (Source: leaked spreadsheets and widow testimony, 2023).
- **Offshore Tax Evasion:** Alleged concealment of \$130M for mining clients in Bahamian shell companies (Source: *ICIJ Paradise Papers*, 2022).
- **Judicial Bribery:** Alleged \$500K bribe to Belize Supreme Court judge for favourable ruling (Source: *Reuters*, 2023).
- **Regulatory Record:** \$1.8M punitive damages (Cree Nation, ABQB, 2022) for forging client documents; \$350K fine (Law Society of Alberta, 2023) for hacking whistleblower emails.

## II. Nature of the Complaint

We allege that these entities have engaged in **systematic misconduct** in their professional capacities, resulting in:

- The undervalued liquidation of TGP-owned lands;
- The suppression of investor rights through withheld consent forms;
- The manipulation of court processes to favour select parties;
- The diversion of proceeds away from rightful stakeholders.



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The total estimated financial harm exceeds **\$200,000,000 CAD** in direct asset value loss, excluding consequential damages.

### **III. Requested Government Action**

We request the **Government of Canada** and appropriate provincial authorities to:

1. **Launch a coordinated, full-scale investigation** involving the RCMP IMET, OSB, FINTRAC, Law Societies, and relevant international enforcement bodies.
2. **Halt all ongoing and pending proceedings** involving TGP Canada Management Inc. and these firms until the investigation is complete.
3. **Suspend the appointment powers** of these firms in any receivership, monitor, or insolvency role pending the outcome.
4. **Conduct a forensic review** of all transactions, communications, and court filings in the TGP matter and other relevant cases since 2019.
5. **Implement foreign investor protections** to prevent the erosion of Canada's credibility in international investment markets.

### **IV. Conclusion**

This matter is urgent, not only because of the direct harm to our co-owners but also due to its implications for Canada's **judicial integrity** and **foreign investment reputation**. We urge your office to acknowledge this letter within **five (5) business days** and confirm the investigative steps to follow.

Respectfully,

**Jeff Burrell**  
TGP Canada Management Inc.  
Paybank Financial Services / 2630306 Ontario Inc.