

Canadian Charities Operating Outside of Canada

A presentation to the
Jewish Foundation of Greater Toronto
December 11, 2007

Mark Blumberg



www.blumbergs.ca

Overview

- ❑ Theme – There are rules for Canadian charities operating abroad, they are not too onerous, they focus on control, monitoring and records.
- ❑ 82,000 Charities –every charity is different – objects, areas of charitable work, philosophy, risk tolerance, public profile, donors and level of government support, independent versus international affiliations.
- ❑ CRA as “silent” partner, protecting taxpayers.



Introduction and Overview

- ❑ Importance
- ❑ Good works outside Charitable realm
- ❑ Framework for Charities operating Abroad – Corporate, CRA views and documents, Ways to Carry on Own Activities, Cases
- ❑ Concerns and Traps

Disclaimer - presentation is information, not legal advice



www.blumbergs.ca

Importance of Global Philanthropy for Canadian charities

- ❑ fulfill objects of charity
- ❑ win/win (CC and foreign charity)
- ❑ staff morale and retention
- ❑ donor and stakeholder interest
- ❑ excellence



Importance –for Jewish organizations

- ❑ Tikkun Olam “repairing the world” and Tzedakah (‘charity’)
- ❑ Israel - centrality to Judaism and Jews
- ❑ Galut (“diaspora”)
- ❑ consequences of not following rules - deregistration, intermediate sanctions, embarrassment, friction with others in Canada, loss of donor support, suspicion
- ❑ one set of rules apply to charities, whether Jewish, Christian, Islamic etc.

BLUMBERGS

www.blumbergs.ca

Importance –for Jewish organizations

- ❑ 3 of 4 recent court cases dealing with Canadian charities operating abroad deal with Jewish/Israeli charities.
- ❑ is CRA anti-semitic? No.
- ❑ are Jewish charities more non-compliant? No.
- ❑ are some professional advisors using charities to further their own financial, personal, ideological and other agendas?

BLUMBERGS

www.blumbergsg.ca

CRA Charities Partnership and Outreach Program Funding Priorities

- ❑ 1. Conducting foreign activities in compliance with a charity's obligations under the *Income Tax Act*.

Increasingly, registered charities are conducting some of their charitable activities internationally. As charitable activities are conducted beyond Canadian borders, a number of control or compliance issues may arise that could result in a charity being non-compliant with respect to its obligations under the *Income Tax Act*.

- ❑ 2. Fundraising, receipting, and maintaining books and records in compliance with a charity's obligations under the *Income Tax Act*:

See CRA website.



www.blumbergs.ca

Integrity

Of the ten types of charities in Canada according to a recent survey Canadians are most likely to trust hospitals a lot or some (89%), trust charities that focus on children/children's activities (85%), trust health prevention/health research (84%), trust charities that focus on education (77%), churches (67%) and least likely to trust international development charities (57%).

**Talking About Charities 2006: Tracking Canadian's
Opinions About Charities and The Issues Affecting Them**
by Ipsos Reid for The Muttart Foundation, September
2006



www.blumbergs.ca

Statistics - Importance of Global Philanthropy

- ❑ 1.4 B (2002), 1.8B (2004), 2.1B (2005)
(Canadian charities foreign expenditures)
- ❑ \$126M spent by Canadian Jewish or Israeli charities outside of Canada (ie Israel, US, and elsewhere)(2005 T3010 numbers)



Registered Canadian charities carrying on activities in Israel (2004)

- ❑ 150 listed Israel, 171 listed ME (probably 24 of which operate in Israel)
- ❑ See Schedule A
- ❑ Many Canadian Jewish charitable organizations carrying on foreign activities in US and other places around the world, not necessarily in Israel.



Top 'Jewish' Charities operating Abroad

10. UNITED ISRAEL APPEAL OF CANADA INC
\$33,659,556

57. THE CRB FOUNDATION-LA FOUNDATION CRB
\$6,291,468

71. JEWISH NATIONAL FUND OF CANADA (KEREN KAYEMETH
LE'ISRAEL) INC. \$5,006,836

80. CANADIAN SHAARE ZEDEK HOSPITAL
FOUNDATION/FONDATION CANADIENNE DE L'HOPITAL
SHAARE ZEDEK \$4,119,900

89. CANADIAN FRIENDS OF MOSOOS CHASIDEI BELZ
\$3,537,206



www.blumbergs.ca

Top Charities operating in Israel

117. COLEL CHABAD LUBAVITCH FOUNDATION
OF ISRAEL \$2,623,290

120. LES AMIS CANADIENS DE TORAH VYIRAH
RABBINICAL COLLEGE \$2,557,845

123. THE KLAL FOUNDATION \$2,495,166

125. MIFAL KLITA \$2,412,280

130. CANADIAN FRIENDS OF ZEFAT \$2,345,589

Top Canadian Charities Operating Outside of Canada (2005) -
Another dramatic increase at <http://www.blumbergs.ca/articles.php>

BLUMBERGS

www.blumbergs.ca

Carrying on Good Works Abroad outside of the CRA charity regulation

- ❑ personal donations of cash or in kind items to foreign charities, no tax receipt
- ❑ business – donation, sponsorship, advertising, doing business in developing countries, CSR, etc
- ❑ For profit “non-profit” -Google.org, micro-loans
- ❑ non-profit without charitable status – if no need to issue tax receipts.



Carrying on Good Works Abroad outside of the CRA Charity regulation

- ❑ volunteering –at home and abroad
- ❑ gifts to family, friends, former employees abroad –remittances



Operating Abroad – Corporate and Trust law issues

- ❑ Letters Patent/Articles of Incorporation – objects and restrictions –avoiding ultra vires activities
- ❑ By-laws and resolutions
- ❑ Trusts agreement –scope
- ❑ Donor restricted gifts



Charitable Objects – eg. International Development

Relief of Poverty -To relieve poverty in developing nations by providing food and other basic supplies to persons in need.

Health - To develop or promote public health in developing nations by educating and instructing the public on prevention of, and curative measures for, health problems and by researching and documenting changes in the health of the community.

Drinking Water -To improve the quality of drinking water in developing nations by constructing wells and water treatment, irrigation and sewage treatment systems.

Agriculture - To improve skills in forestry, agriculture and horticulture and to assist in the preservation of the environment in developing nations.

Disaster Relief - To provide necessities of life to victims of disasters.



Source: Ontario Not-For Profit Incorporator's Handbook.

www.blumbergs.ca

<http://www.attorneygeneral.jus.gov.on.ca/english/family/pgt/nfpinc/appendixg.asp>

Objects that may require modifications or additions

To establish and maintain a hospital.

To establish and maintain a hospital in Mississauga, Ontario.

To receive and maintain a fund or funds and to apply all or part of the principal and income therefrom, from time to time, to charitable organizations that are also registered charities under the Income Tax Act (Canada).



www.blumbergs.ca

CRA – Considerations that apply to all charities and those operating abroad

- ❑ no partisan political activities
- ❑ limited non partisan political activities
- ❑ only undertake charitable activities
(relieve poverty, advance education, advance religion, benefit community as a whole)
- ❑ cannot violate Canadian public policy



CRA Views on Canadian Charities operating outside of Canada

- ❑ RC4106 "Registered Charities Operating Outside Canada"
- ❑ Registered Charities Newsletters
- ❑ Information Letters
- ❑ Policy Statements
- ❑ Consultation on Proposed Policy



CRA – Considerations that apply to Canadian charities operating abroad

- ❑ The Canadian Income Tax Act allows charities to conduct their charitable purposes by
 - 1) giving monies to another "qualified donee" (usually a Canadian charity but also includes the United Nations and a small number of foreign entities) or
 - or
 - 2) their own activities (at home or abroad)
- ❑ No third option - A Canadian charity cannot just transfer money to a foreign charity.



Donations to Qualified Donees –Tax Credit for Charitable activities abroad

- ❑ registered charities, registered Canadian amateur athletic assoc., tax exempt housing corporations, Canadian municipalities
- ❑ United Nation and its agencies
- ❑ certain Universities outside Canada that student body of which ordinarily include students from Canada(Reg 3503) (“Schedule VIII Universities” or “prescribed universities”)



Donations to Qualified Donees –Tax Credit for Charitable activities abroad

The universities situated in Israel that are prescribed by section 3503 are the following:

- Bar-Ilan University, Ramat-Gan
- Ben Gurion University of the Negev, Beersheba,
- Jerusalem College for Women,
- Bayit-Vegan, Jerusalem
- École biblique et archéologique française, Jerusalem
- Hebrew University of Jerusalem, Jerusalem
- Jerusalem College of Technology, Jerusalem
- Technion-Israel Institute of Technology, Haifa
- Tel-Aviv University, Tel-Aviv
- University of Haifa, Haifa
- Weizmann Institute of Science, Rehovot
- Yeshivat Aish Hatorah, Jerusalem



www.blumbergs.ca

Eligibility for Tax Credit (Continued)

- ❑ a charitable organization outside of Canada to which Her Majesty in right of Canada (federal government or its agents) has made a gift in the corporation's taxation year or the preceding 12 months. (see CRA Circular 84-3R5 and Attachment to IC 84-3R5, Gifts to Certain Charitable Organizations Outside Canada)



Eligibility for Tax Credit (Continued)

□ Examples of Her Majesty in right of Canada gifts:

Aga Khan Foundation, Aga Khan University Foundation, Buddhist Compassion Relief Tzu Chi Foundation R.O.C., Canadian International School of Hong Kong Limited, Cayman Islands National Recovery Fund, Center for Strategic and International Studies (United States), Council for Canadian American Relations, Inc., International Peace Garden Inc., Stedelijk Museum (Holland), The Centre for our Common Future, The Foundation for Canadian Studies in the United Kingdom, The State Hermitage Museum Russia, Woodrow Wilson International Centre for Scholars United States, Village Focus International, The American Assembly United States

BLUMBERGS

www.blumbergs.ca

Eligibility for Tax Credit (Continued)

- ❑ Article XXI(6) Canada-US Income Tax Convention
- ❑ Canadian donor receives tax credit, limited to Canadian donor's US source income to US recognized charity. ie. Would US charity, if Canadian organization, have been charitable?



Ways for Canadian Registered Charity to Carry on "Own Activities"

1. employee in foreign country
2. agency agreement
3. contractor
4. joint venture agreement/joint ministry agreement
5. cooperative partnership agreement



1) Employees or Volunteers

- ❑ Can be Canadian employees or volunteers or locals.
- ❑ best model? eg. MSF, missionaries
- ❑ skills, beliefs, control, reporting, language, returning workers
- ❑ concerns – local knowledge, costs, sustainability, danger,

BLUMBERGS

www.blumbergs.ca

2) Agency Agreement

- ❑ Canadian charity appoints agent abroad to conduct Canadian charity's activities with Canadian charity providing funding and control
- ❑ most common
- ❑ need written agency agreement
- ❑ concern – charity liability for agents actions, agents ignore agreement, hierarchy



3) Contractor Agreement

- ❑ Canadian charity hires foreign contractor to conduct certain work.
- ❑ eg. drill well
- ❑ need written agreement
- ❑ not agent – business agreement, limited liability



4) Joint Venture/Joint Ministry Agreement

- ❑ Canadian charity can work with a foreign organization jointly pursuant to a joint venture/ministry agreement (JVA/JMA)
- ❑ pool resources to carry out certain works
- ❑ need written JVA or JMA
- ❑ control by CC at least in proportion to CC contribution



5) Cooperative Partnership Agreement

- ❑ CC works with foreign organization and each contributes different resources and undertakes a different part of the project.
- ❑ need Cooperative Partnership Agreement.
- ❑ disbursement quota concern if CC does all admin services for project



RC 4106 – “Own activities”

- assurances that other organization is able to deliver services (due diligence)
- expenses must further objects of Canadian Charity and constitute charitable activities
- adequate written agreement
- periodic, specific instructions
- regularly monitors project and evidence
- periodic payments, right to discontinue, in certain circumstances



Written Agreements –Part 1

- 1) names and addresses of all parties
- 2) duration of agreement/project
- 3) description of specific activities
- 4) written progress reports and right to inspect
- 5) payments by instalment based on reasonable progress



Written Agreements –Part 2

- 6) withdrawing or withholding funds at charities discretion
- 7) adequate records in Canada
- 8) agent – adequate records and funds segregated for Canadian Charity's funds
- 9) signature of all parties
- 10) date



Transfer of Property in Foreign Country

- ❑ Canadian charity should maintain ownership and control over assets
- ❑ can sell assets at FMV or transfer to qualified donee
- ❑ exception
 - 1) can transfer assets if charitable ('charitable goods policy')—eg. food to hungry, prayer books
 - 2) prohibition on foreign ownership of real estate
 - 3) development work –can turn over to local control – need assurances of continued community benefit



“Charitable Goods Policy”

Equally acceptable are transfers of goods and services that are directed to a particular use by the very nature of the goods and services so transferred.

Examples of such transfers include:

- transfers, by a research organization, of books and scientific reports to anyone interested (including foreign governments, libraries, schools, etc.),
- transfers of books - on a subject of particular interest to an educational charity - to public libraries in major cities all over the world,
- transfers of medical supplies to a refugee camp,
- transfers of food, blankets, etc. to a charity coping with a natural disaster,
- transfers of drugs, medical equipment, etc. to poorly equipped hospitals,
- transfers of personnel to schools or hospitals (on loan).

1985 CRA Staff memo cited in CMDA Case



www.blumbergs.ca

Charitable Goods Policy – Beware.

- ❑ Transfers of goods or services can more easily be viewed as charitable activities per se. The transfer of a piece of equipment that is meant to be used **only** for charitable purposes to an organization that will **clearly** use it for such purposes is **likely** to be a charitable activity. (MDA Case) [emphasis added]
- ❑ CRA will look at nature of goods, which organization receives goods and controls placed

BLUMBERGS

www.blumbergs.ca

Charitable Goods Policy – Beware.

- ❑ is it a policy?
- ❑ suspicious transfers, sham transactions.
- ❑ when to use – small amounts, emergency, very reputable, non-political, non-sectarian, organization acting as representative.



Canadian Cases on Registered Charities Operating Abroad

- ❑ Tel-Aviv Foundation Case
- ❑ Canadian Magen David Adom Case
- ❑ Bayit Lepletot Case
- ❑ Travel Just Case



Canadian Committee for the Tel Aviv Foundation v. Canada (2002 FCA 72)

- ❑ promotion of education and relief of poverty in Tel-Aviv by agency agreement
- ❑ 1990 audit (lack documents of overseas expenditures etc)
- ❑ 1993 audit –new Israeli management not aware of Agency Agreement



Tel Aviv Foundation v. Canada (continued)

- ❑ Foundation made undertaking in 1996 to “conform strictly to the requirements of Revenue Canada, including the specific provisions of the Agency Agreement”.
- ❑ 1997 audit – CRA says violated agency agreement in little control over funds disbursed to agent (just conduit and not controlling), cannot show reporting, funds of Foundation not kept separate from agent, receipt



Tel Aviv Foundation v. Canada (continued)

and T3010 and T4 irregularities, Foundation did not authorize projects, grant to Air Force Museum in Beersheva (outside of objects - ultra vires), no evidence of alleged oral arrangements that superceded agency agreement.

- ❑ FCA in 2002 finds against Foundation



Tel Aviv Foundation –Lessons Learned

- ❑ stay within your objects
- ❑ have agreement but also follow it –control projects and have reporting
- ❑ undertakings must be strictly complied with
- ❑ avoid military in foreign country?
- ❑ changes to agreements should be in writing

BLUMBERGS

www.blumbersgs.ca

Canadian Magen David Adom for Israel and MNR (2002 FCA 323)

- ❑ object – To donate emergency medical supplies and ambulances directly to the people of Israel
- ❑ CMDA appointed Canadian representative in Israel to implement
- ❑ 1986 audit – concerns – funds to US MDA for purchasing ambulances, not directly to General Motors, and also no agency agr. with MDA in Israel and no control over ambulances



Canadian Magen David Adom (cont)

- ❑ CMDA acknowledges need for agency agreement, but does not enter into one, MDA in Israel is not interested
- ❑ charitable goods policy but sometimes expenditures considered remote
- ❑ T3010 - magnetic punch card system – should be admin, not charity, CRA disapproves of expense



Canadian Magen David Adom (cont)

- ❑ DQ shortfall –\$169,000
- ❑ audit of 1993 and 1995, 1996 years
- ❑ concerns – no agency agreement, persistent DQ problems, non-charitable expenditures like bullet proof vests (too indirect/can be used by anyone), not “emergency medical supplies” –objects.
- ❑ CMDA says no need for agency agreement, no DQ problem, defends bullet proof vests



Canadian Magen David Adom (cont)

- ❑ public policy concern – supporting permanence of settlements in West Bank –no interpretation bulletin on this –must be “definite and somehow officially declared and implemented policy”
- ❑ transfer of capital assets (ambulance) to MDA in Israel and one to IDF after agency agreement. Ambulances and telecom equipment can be used for non-charitable purposes

BLUMBERGS

www.blumbergs.ca

Canadian Magen David Adom (cont)

- ❑ 2001 notice of revocation and FCA dismisses appeal and CMDA loses status
- ❑ finds that no public policy issue here, but concern over:
 - 1) agent “not effectively authorized, controlled and monitored by the charity”
 - 2) equipment not only used for charitable purposes and including concerns of involvement by agent with Israeli military operations



Magen David Adom –Lessons Learned

- ❑ CRA will go after powerful and good charities
- ❑ need for written agreement
- ❑ disbursement quota
- ❑ no donations of equipment to foreign military
- ❑ who wants a 16 year audit?



Canadian charities and involvement with foreign militaries

- ❑ permissible – eg in natural disaster foreign military transports your food to affected area
- ❑ not permissible – eg. transferring to foreign military capital equipment
- ❑ grey area
- ❑ recent discussions - CMDA, Heseq Foundation
- ❑ concern in conflict areas of close relationship between humanitarian groups and the military



Bayit Lepletot, 2006 FCA 128 (March 28, 2006)

- ❑ Canadian Charity deals with Rabbi in Israel who “presumably” exercises some control over Israeli charity with similar name to the Canadian Charity. But no evidence of his control over charitable works
- ❑ Agent can carry on charitable work but it must be shown that the agent is actually carrying on the work. Not sufficient for agent to be part of another organization that does work. No factual basis for arguing delegation. Status revoked.



Travel Just, 2006 FCA 343 (October 24, 2006)

- ❑ application for charitable status – ethical tourism –deemed refusal and appeal
- ❑ OBJECTS a. ...to create and develop model tourism development projects that contribute to the realization of international human rights and environmental norms and that achieve social and conservation aims that are in harmony with economic development aims for the particular region; ..
- ❑ concerns – vague/subjective objects and concern with private benefit



“Frequency of Various Type of Non-Compliance by Registered Charities”

- ❑ 1995-2001 – 58 revocations of charities by CRA (except non filing of T3010s)
- ❑ revocation usually numerous problems
- ❑ Lack of control over foreign activities (37 instances) – educational letter (16%), Undertaking letter (62%), Revocation (21%)

Source: Background paper by Diana Laing, John Skelton and Judy Torrance, for the Voluntary Sector Initiative.



www.blumbergs.ca

Concerns and Traps

1. terrorism
2. bribery and corruption
3. fraud and illegal charity tax shelters
4. money laundering
5. private benefits



Concerns and Traps (continued)

6. logistics/security of staff abroad
7. ethical issues
8. cultural, religious, gender issues.
9. IP issues (trademark, copyright, trade secrets, licences)
10. Legal constraints outside of Canada (eg. Russia, foreign currency restrictions, land)



Concerns and Traps (continued)

11. donor and CIDA constraints
12. books and records (in Canada, official language, frequency, types)



1) Terrorism

- ❑ Charities Registration (Security Information) Act (Canada) – disqualifies organizations
- ❑ Charities in the International Context (CRA)
- ❑ U.S. Department of the Treasury Anti-Terrorist Financing Guidelines: Voluntary Best Practices for U.S.-Based Charities.
- ❑ UK –Operational Guidance – Charities and Terrorism (OG96)



www.blumbergs.ca

Terrorism –U.S. Treasury Best Practices

- ❑ Governance, Disclosure, Accountability
- ❑ Financing Procedures
- ❑ name of organization in English, jurisdiction in which operates, searches (public filings, public databases and anti-terrorism lists), no cash, name and DOB of key employees, certifications by organization, bank references, periodic reporting, on-sight audits if appropriate



Terrorism - UK –Operational Guidance

- ❑ rare but possible
- ❑ no links to terrorist organizations
- ❑ report to proper authorities any allegations
- ❑ trustees are accountable.
- ❑ terrorists – raising money, smuggle people, schools for recruitment/ training, propaganda, money laundering



Terrorism - UK (continued)

- ❑ beware of large donation from unknown individuals, verify
- ❑ donations conditional on certain organization in field being used
- ❑ offers of cash for certain period of time, no interest, but principal to be returned. Or principal to be returned in different currency
- ❑ concern about 'hawala' system of money transfer – need paper trail



Terrorism – US Office of Foreign Assets Specially Designated Nationals/Blocked Persons

AMERICAN FRIENDS OF THE UNITED YESHIVA (a.k.a. AMERICAN FRIENDS OF YESHIVAT RAV MEIR; a.k.a. COMMITTEE FOR THE SAFETY OF THE ROADS; a.k.a. DIKUY BOGDIM; a.k.a. DOV; a.k.a. FOREFRONT OF THE IDEA; a.k.a. FRIENDS OF THE JEWISH IDEA YESHIVA; a.k.a. JEWISH IDEA YESHIVA; a.k.a. JEWISH LEGION; a.k.a. JUDEA POLICE; a.k.a. JUDEAN CONGRESS; a.k.a. KACH; a.k.a. KAHANE; a.k.a. KAHANE CHAI; a.k.a. KAHANE LIVES; a.k.a. KAHANE TZADAK; a.k.a. KAHANE.ORG; a.k.a. KAHANETZADAK.COM; a.k.a. KFAR TAPUAH FUND; a.k.a. KOACH; a.k.a. MEIR'S YOUTH; a.k.a. NEW KACH MOVEMENT; a.k.a. NEWKACH.ORG; a.k.a. NO'AR MEIR; a.k.a. REPRESSION OF TRAITORS; a.k.a. STATE OF JUDEA; a.k.a. SWORD OF DAVID; a.k.a. THE COMMITTEE AGAINST RACISM AND DISCRIMINATION (CARD); a.k.a. THE HATIKVA JEWISH IDENTITY CENTER; a.k.a. THE INTERNATIONAL KAHANE MOVEMENT; a.k.a. THE JEWISH IDEA YESHIVA; a.k.a. THE JUDEAN LEGION; a.k.a. THE JUDEAN VOICE; a.k.a. THE QOMEMIYUT MOVEMENT; a.k.a. THE RABBI MEIR DAVID KAHANE MEMORIAL FUND; a.k.a. THE VOICE OF JUDEA; a.k.a. THE WAY OF THE TORAH; a.k.a. THE YESHIVA OF THE JEWISH IDEA; a.k.a. YESHIVAT HARAV MEIR) [FTO] [SDGT] [SDT] AMERICAN FRIENDS OF YESHIVAT

BLUMBERGS

www.blumbergs.ca

Terrorism – US Office of Foreign Assets Specially Designated Nationals/Blocked Persons

RAV MEIR (a.k.a. AMERICAN FRIENDS OF THE UNITED YESHIVA; a.k.a. COMMITTEE FOR THE SAFETY OF THE ROADS; a.k.a. DIKUY BOGDIM; a.k.a. DOV; a.k.a. FOREFRONT OF THE IDEA; a.k.a. FRIENDS OF THE JEWISH IDEA YESHIVA; a.k.a. JEWISH IDEA YESHIVA; a.k.a. JEWISH LEGION; a.k.a. JUDEA POLICE; a.k.a. JUDEAN CONGRESS; a.k.a. KACH; a.k.a. KAHANE; a.k.a. KAHANE CHAI; a.k.a. KAHANE LIVES; a.k.a. KAHANE TZADAK; a.k.a. KAHANE.ORG; a.k.a. KAHANETZADAK.COM; a.k.a. KFAR TAPUAH FUND; a.k.a. KOACH; a.k.a. MEIR'S YOUTH; a.k.a. NEW KACH MOVEMENT; a.k.a. NEWKACH.ORG; a.k.a. NO'AR MEIR; a.k.a. REPRESSION OF TRAITORS; a.k.a. STATE OF JUDEA; a.k.a. SWORD OF DAVID; a.k.a. THE COMMITTEE AGAINST RACISM AND DISCRIMINATION (CARD); a.k.a. THE HATIKVA JEWISH IDENTITY CENTER; a.k.a. THE INTERNATIONAL KAHANE MOVEMENT; a.k.a. THE JEWISH IDEA YESHIVA; a.k.a. THE JUDEAN LEGION; a.k.a. THE JUDEAN VOICE; a.k.a. THE QOMEMIYUT MOVEMENT; a.k.a. THE RABBI MEIR DAVID KAHANE MEMORIAL FUND; a.k.a. THE VOICE OF JUDEA; a.k.a. THE WAY OF THE TORAH; a.k.a. THE YESHIVA OF THE JEWISH IDEA; a.k.a. YESHIVAT HARAV MEIR) [FTO] [SDGT] [SDT]



www.blumbergs.ca

2. Bribery and Corruption

- ❑ Corruption of Foreign Public Officials Act (Canada)
- ❑ definition of official and bribe are broad
- ❑ CIDA also has “Protocol for Dealing with Allegations of Corruption” – requires disclosure of previous offences etc.



3. Fraud and Tax Shelters

- ❑ fraudulent solicitations –advance fee fraud
- ❑ internal fraud
- ❑ fraud by agent, contractor
- ❑ scam fundraising and trusts
 - ❑ Gifting trust arrangements
 - ❑ Buy low, donate high
 - ❑ Leveraged cash donations



4. Money Laundering

- ❑ Criminals/terrorists conceal illegal funds and convert to seemingly legitimate funds.
- ❑ currency exchange/electronic fund transfer
- ❑ interest free loans
- ❑ co-mingling with legitimate funds
- ❑ suspicious cash transactions



Money Laundering (Continued)

- ❑ money laundering was not crime in Israel
- ❑ Financial Action Task Force on Money Laundering (the 'FATF') set up by G-7 identified Israel in 2002 as “non-cooperative” in the fight against money laundering and placed Israel on its monitoring list
- ❑ 2002 Israel founded the Israel Money Laundering Prohibition Authority
- ❑ Israel since removed from list of non-cooperative countries and monitoring list



5. Private versus Public Benefits

- A private benefit occurs when one of the reasons for the organization's existence is to confer individual benefits to a limited group of persons on the basis of criteria that are not relevant to the charitable purpose at hand. Are private benefits incidental, reasonable?
- benefit should be tangible, public-at-large or sufficient segment of the public, not restrict delivery of the benefits to a certain group or class of persons without adequate justification, organization cannot charge fees for its services where the effect of the charge would be to unduly exclude members of the public. CPS-024



6. Logistics/Security of Staff Abroad

- ❑ Assessment and Risk Management
- ❑ Basic personal and team security training
- ❑ Civil and military coordination
- ❑ Security policy and Crisis management
- ❑ see RedR.org



7. Ethical Issues

- ❑ cooperation versus control between Canadian charity and agent/JV partner
- ❑ choosing countries - security versus long term commitment/sustainability, funders
- ❑ sexual coercion by aid workers
- ❑ confusion between military/humanitarian
- ❑ truthfulness of fundraising solicitations

See CCIC.org website



www.blumbergs.ca

8. Cultural, Religious, Gender, Race issues

- ❑ cultural sensitivity vs. uncritical acceptance
- ❑ different elements within society
- ❑ empowerment
- ❑ dialogue before project.

See CIDA's Questions About Culture, Gender Equality and Development Cooperation

at <http://www.acdi-cida.gc.ca/>



www.blumbergs.ca

9. Intellectual Property

- ❑ trade marks, copyright, patent, trade secrets, industrial design
- ❑ goodwill
- ❑ licencing agreement
- ❑ often protection national in scope
- ❑ easy to proactively deal with

10. Foreign Legal constraints

- ❑ restrictions on foreign charities –operation and registration
- ❑ restrictions on occupations and professions (eg. doctor, nurse, pharmacist, engineer)
- ❑ restriction on activities – eg. microfinance (lending, financial services)
- ❑ restrictions on ownership of land/buildings
- ❑ obtain local legal assistance



11. CIDA Funding of Project

- ❑ \$3.7 billion allocated in 2004/2005
- ❑ Countries and Territories Eligible for CDA Development Partner Countries
- ❑ matching funds
- ❑ because CIDA provides funds does not necessarily mean activity is charitable under Canadian law.



12. Books and Records

- ❑ English or French, kept in Canada
- ❑ substantiate qualification of charity to registration, permit verification of donations, be supported by source documents.
- ❑ “record” includes
an account, an agreement, a book, a chart or table, a diagram, a form, an image, an invoice, a letter, a map, a memorandum, a plan, a return, a statement, a telegram, a voucher, and any other thing containing information, whether written or in any other form.

Source: IC78-10R4



www.blumbergs.ca

Books and Records (Cont)

- ❑ contracting out to third party does not relieve charity of obligations
- ❑ traditional or electronic, backups
- ❑ failure to keep adequate books and records grounds for revocation



Books and Records (Cont)

- ❑ RC4106 “reasonable reports on the progress of its projects and programs”
- ❑ These reports should be supported with documentary evidence such as: copies of written agreements; deeds; financial statements; invoices; photos; minutes of meetings; and any other materials that reflect the charity's ongoing participation and that show how the charity's funds are used.
- ❑ Suggestions for Agents, Contractors, Joint Ventures, Cooperative Partnerships, CIDA projects.



T3010A – Registered Charity Information Return

- C4 -Did the charity carry on programs, directly or indirectly, **outside** Canada? If *yes*, were any carried out: by employees or volunteers of the charity? - under agency agreement, contract, joint-venture, or similar arrangements? - through gifts to qualified donees? - by other means?

- C5 For programs the charity managed directly, outside of Canada, list the countries or regions where programs were carried on. Do **not** include countries or regions where programs were managed by a qualified donee.

- F1 F1 What were the total expenditures on programs **outside** Canada during the fiscal period, excluding gifts to qualified donees?

- DUE 6 MONTHS AFTER CHARITIES YEAR END



More Information

- ❑ <http://www.cra-arc.gc.ca/tax/charities/> CRA
- ❑ http://www.blumbergs.ca/non_profit.php
- ❑ <http://www.globalphilanthropy.ca>

Mark Blumberg

www.blumbergs.ca

416-361-1982 x. 237

mark@blumbergs.ca



www.blumbergs.ca

T3010 2004 Information – Question - C5 – all Canadian Registered Charities identifying on the T3010 Registered Charity Information Return that they are Conducting Activities in either **Israel** or the **Middle East**

ISRAEL

ORA INTERNATIONAL

JEWISH RUSSIAN CHARITY FUND (CHAMAH)

CANADIAN FRIENDS OF BOYS TOWN JERUSALEM / LES AMIS CANADIENS DE LA CITE DES GARCONS A JERUSALEM

CANADIAN FRIENDS OF MASSUAH

CARIBOO CHRISTIAN LIFE FELLOWSHIP

DAVID & GLADYS BLANK CHARITABLE FOUNDATION

THE RABBI MORTON GREEN FOUNDATION

CANADA-ISRAEL CULTURAL FOUNDATION

CANADIAN FOUNDATION FOR PIONEERING ISRAEL

CANADIAN SHAARE ZEDEK HOSPITAL FOUNDATION/FONDATION CANADIENNE DE L'HOPITAL SHAARE ZEDEK

CHILD EVANGELISM FELLOWSHIP OF CANADA

EMUNAH WOMEN OF CANADA/FEMMES EMUNAH DU CANADA

LIVING SPRINGS NEW TESTAMENT CHURCH (COMMUNITY)

NA'AMAT CANADA INC.

CANADIAN ZIONIST CULTURAL ASSOCIATION

L'EGLISE COMMUNAUTAIRE MISSIONNAIRE DE WAKEFIELD

BEIT HALOCHEM CANADA /AID TO DISABLED VETERANS OF ISRAEL (CANADA)

CANADIAN FRIENDS OF ALYN

CANADA ISRAEL ENDOWMENT FOUNDATION

CANADIAN FRIENDS OF BE'ER AVROHOM

CANADIAN FRIENDS OF BENE BERAQ HOSPITAL

CANADIAN FRIENDS OF CHAIM JOSEF S YESHIVA

THE CANADIAN FRIENDS OF ILAN FOUNDATION FOR HANDICAPPED CHILDREN

CANADIAN FRIENDS OF JEWISH HERITAGE EDUCATIONAL CENTER

CANADIAN FRIENDS OF KOLLEL AMERICA AND CANADA REG D

CANADIAN FRIENDS OF MAOZ SOCIETY

CANADIAN FRIENDS OF RAMOT SHAPIRA

CANADIAN FRIENDS OF THE WORLD UNION FOR PROGRESSIVE JUDAISM

CANADIAN FRIENDS OF YAD LACHIM ORGANIZATION

CANADIAN FRIENDS OF YESHIVAT HAR ETZION / LES AMIS CANADIENS

CANADIAN FRIENDS OF YESHIVATH BETH ABRAHAM JERUSALEM

CDN SOCIETY FOR YAD VASHEM

CHRISTIAN LIFE ASSEMBLY

CHRISTIAN RETREAT, GOSPEL CRUSADE OF CANADA

LA CORPORATION DU CENTRE DES HAUTES ETUDES TALMUD

GLOBAL HARVEST CENTRE ASSOCIATION

LEMA'AN ZION

HOLY LAND CONSERVATION FUND

INTERNATIONAL HEBREW CHRISTIAN ALLIANCE IN CANADA

KELOWNA CHRISTIAN CENTER SOCIETY

KUPATH RAMBAN CANADA

LANDS OF THE BIBLE ARCHAEOLOGY FOUNDATION

LE COMITE CANADIEN DU COLLEGE SHENKAR EN ISRAEL INC.-THE CANADIAN COMMITTEE FOR SHENKAR COLLEGE IN ISRAEL INC.

LES AMIS CANADIENS DE LA COMMUNAUTE DES GARDIENS DES MURS DE

MAOR: AN ORGANIZATION TO PROMOTE STUDIES OF JEWISH LIFE

MARANATHA EVANGELISTIC ASSOCIATION

MARANATHA GOOD NEWS CENTRE INC.

MEOROTH

APOSTOLIC RESOURCE CENTRE SOCIETY

SHALOM ACHSHAV PEACE FOUNDATION

LA SOCIETE KALEV D'ASSISTANCE BENEVOLE ENR.-KALEV FREE LOAN & AID SOCIETY REG

THE CANADIAN INSTUTUTE FOR ADVANCED RESEARCH-L'INSTITUT CANA

THE CHURCH (OF THE SAINTS) IN CALGARY

THE CRB FOUNDATION/LA FONDATION CRB

THE CYPIN CHARITABLE FOUNDATION

THE HARVEY AND SHEILA HECKER FAMILY FOUNDATION

THE PHINEAS KURTZ FAMILY FOUNDATION

THE P SCHWARTZ FAMILY FOUNDATION

TIFERETH CHARITABLE FOUNDATION

TORAH SCHOOLS FOR ISRAEL,

HIGH WAY CHURCH

CANADIAN FRIENDS OF YESHIVATH BIRKAT MOSHE-MAALEH ADUMIN/LESAMIS CANADIENS YESHIVATH
BIRKAT MOSHE-MAALEH ADUMIN

CANADA-ISRAEL CHILDREN'S CENTRES

NEW ISRAEL FUND OF CANADA

LA GALERIE FOKUS

UNITED ISRAEL APPEAL OF CANADA INC

HADASSAH-WIZO ORGANIZATION OF CANADA - L'ORGANISATION HADASSAH-WIZO DU CANADA

CANADIAN FRIENDS OF SHALVA ISRAEL ASSOCIATION

HUMANE SOCIETY OF CANADA FOR THE PROTECTION OF ANIMALS AND T
CANADIAN FOUNDATION FOR THE EDUCATION AND WELFARE OF JEWS OF THE C I S
COLEL CHABAD LUBAVITCH FOUNDATION OF ISRAEL
GUELPH VINEYARD CHRISTIAN FELLOWSHIP
CHOSON KALLAH FUND OF TORONTO
SOLID GROUND BIBLE STUDY MINISTRIES
CANADIAN FRIENDS OF THE JAFFA INSTITUTE
ALEH REHABILITATION OF CANADA
CANADIAN COUNCIL OF JEWISH COMMUNITY CENTRES AND YM-YWHA'S
CNEWA CANADA
REB MAYER BAAL HANES - CHIBAS JERUSALEM
LOVE-N CARE MINISTRIES INC.
CANADIAN FRIENDS OF YESHIVA AND KOLLEL MAOR HATORAH
THE ARI AND PEARL LITWIN FOUNDATION
FULL GOSPEL TABERNACLE
THE PRESS FOUNDATION
CANADIAN FRIENDS OF KNESET BNEI
CANADIAN FRIENDS OF THE SHALOM HARTMAN INSTITUTE/AMIS CANADIENS DE L'INSTITUT SHALOM
HARTMAN
THE TOR-DER FUND
HILLEL OF GREATER TORONTO
EGLISE DE LA PENTECOTE DE ST- HYACINTHE
CANADIAN FRIENDS OF MAOR GERSHON SCHOLARSHIP KOLLEL
CANADIAN FRIENDS OF KFAR CHASIDIM
END-TIME HANDMAIDENS AND SERVANTS OF CANADA INC
THE CANADIAN JEWISH EDUCATIONAL FUND

CANADIAN FRIENDS OF THE MENACHEM BEGIN HERITAGE FOUNDATION

CANADIAN FRIENDS OF KAMENITZER RABBINICAL SEMINARY IN ISRAEL

CANADIAN FRIENDS OF ZEFAT

CANADIAN FRIENDS OF NISHMAT/AMIS CANADIENS DE NISHMAT

CANADIAN FRIENDS OF CHABAD OF TIBERIAS INC

THE CANADIAN FRIENDS OF MERCAZ HATORAH

CANADIAN FRIENDS OF THE ISRAEL COLLEGE OF TECHNOLOGY FOR WOM

CANADIAN FRIENDS OF YAD ELIEZER

THE JUDAH WEINSTOCK MEMORIAL FOUNDATION

CANADIAN CENTER FOR JEWISH COMMUNITY STUDIES CENTRE CANADIENPOUR L'ETUDE DE LA COMMUNAUTE JUIVE

CANADIAN FRIENDS OF KOLEL DIVRAI CHAIM

AARON AND SUSAN LIEBERMAN FOUNDATION

GLOBAL CHRISTIAN MINISTRIES

I C C MINISTRIES ASSOCIATION

VAAD MISHMERES MITZVOS-COMMITTEE TO OBSERVE THE TORAH LAWS

CANADIAN FRIENDS OF KIRYAT CHINUCH LEBANIM

FRIENDS OF SIMON WIESENTHAL CENTER FOR HOLOCAUST STUDIES

CANADIAN FRIENDS OF HOSPITAL TEL HA SHOMER

CANADIAN FRIENDS OF LANIADO HOSPITAL, ONTARIO REGION

GATES OF MERCY

CANADIAN FRIENDS OF THE GHETTO FIGHTERS' HOUSE AND CHILDREN

CANADIAN FRIENDS OF SHIKUN

CANADIAN FRIENDS OF RAMBAM MEDICAL CENTRE

LES AMIS CANADIENS DU CENTRE MEDICAL RAFAEL

CANADIAN FRIENDS OF MISHON LA'CHOLEH

SOCIETY FOR THE EDUCATION OF RUSSIAN JEWS

THE TOWER OF LIGHT CHILDREN'S FOUNDATION\LA FONDATION POUR LES ENFANTS TOUR DE LUMIERE
INC.

FRIENDS OF THE NAZARETH HOSPITAL ASSOCIATION

CANADIAN "BRIDGES FOR PEACE" ASSOCIATION INC.

CANADIAN FRIENDS OF THE ZION ORPHANAGE AND EDUCATIONAL

CANADIAN FRIENDS OF HOLY LAND INSTITUTIONS

DEREK PRINCE MINISTRIES ASSOCIATION

CANADIAN FRIENDS OF MOSDOS CHASIDEI BELZ

NAHAL ISRAEL TORAH CENTRE

FONDATION B'NAI LEVY / B'NAI LEVY FOUNDATION

CANADIAN FRIENDS OF ISRAEL FREE LOAN ASSOCIATION, INC./AMIS CANADIENS DE L'ASSOCIATION DU
PRET SAND INTERET ISRA.LIEN, INC.

JEWISH EDUCATIONAL SERVICES

JEWISH HERITAGE FOUNDATION INTERNATIONAL

HOLY SPIRIT ASSOCIATION FOR THE UNIFICATION OF WORLD CHRISTIANITY

CANADIAN MAGEN DAVID ADOM FOR ISRAEL

OLIVET MENNONITE CHURCH

J.E. WILLIAMSON OPERATION OUTREACH EVANGELISM ASSOCIATION

J.E. WILLIAMSON OPERATION OUTREACH EVANGELISM ASSOCIATION

LAKE SHORE GOSPEL HALL

SHOFAFR (MELEKET) INTERNATIONAL MINISTRIES

MOUNT OLIVES FELLOWSHIP ASSOCIATION

HOLY THEOTOKOS CONVENT

CANADIAN FRIENDS OF YESHIVATH SHEARITH HAPLETAH

CANADIAN FRIENDS OF DENTAL VOLUNTEERS FOR ISRAEL

KARLIN-STULIN CHARITABLE ORGANIZATION

THE SISTERS OF ST. JOSEPH OF HAMILTON

THE CANADIAN ALUMNI OF BAIS HATALMUD, JERUSALEM

CANADA-ISRAEL INSTITUTE FOR SPORTS AND HEALTH EDUCATION

KAHRIZAK FOUNDATION OF CANADA

MESSIAH FOR ISRAEL MINISTRIES

CANADIAN LUTHERAN WORLD RELIEF

MIDDLE EAST

*VE'AHAVTA: THE CANADIAN JEWISH HUMANITARIAN & RELIEF COMMITTEE

*CANADIAN FRIENDS OF EZRAS TORAH

ADRA, CANADA

OVERSEAS COUNCIL FOR THEOLOGICAL EDUCATION AND MISSIONS

AGA KHAN FOUNDATION CANADA / FONDATION AGA KHAN CANADA

BMMF/INTERNATIONAL SERVICE FELLOWSHIP

CHILD EVANGELISM FELLOWSHIP OF CANADA

MENNONITE CHURCH CANADA

CROSSROADS CHRISTIAN COMMUNICATIONS INCORPORATED

ELIM PENTECOSTAL TABERNACLE INC.

EPISCOPAL CORPORATION OF SASKATOON

CHRISTIAN LIFE CENTRE OF FORT ST. JOHN

FRANKFORD PASTORAL CHARGE

FRONTIERS CHRISTIAN MINISTRIES INC.

HIGH ADVENTURE GOSPEL COMMUNICATION MINISTRIES
HUMAN CONCERN INTERNATIONAL (HCI)
IMMACULATE CONCEPTION ROMAN CATHOLIC CHURCH
INTERNATIONAL DEVELOPMENT RESEARCH CENTRE
*JEWISH NATIONAL FUND OF CANADA (KEREN KAYEMETH LE'ISRAEL) INC.
MENNONITE BRETHERN CHURCH OF LINDEN
MENNONITE CENTRAL COMMITTEE CANADA
MILTON BAPTIST CHURCH
MORRIS CERULLO WORLD EVANGELISM OF CANADA
NORTHERN ALBERTA INSTITUTE OF TECHNOLOGY
PARLIAMENTARY CENTRE/LE CENTRE PARLEMENTAIRE
PENTECOSTAL ASSEMBLIES OF NEWFOUNDLAND
PETROLEUM INDUSTRY TRAINING SERVICE ASSOCIATION
THE TRUSTEE BOARD OF THE PRESBYTERIAN CHURCH IN CANADA
CANADIAN COUNCIL FOR THE RED SEA MISSION TEAM (1978)
CROSS ROADS PASTORAL CHARGE
ST. ANDREW'S PRESBYTERIAN CHURCH
ST. JAMES UNITED CHURCH
ST. JOHN THE BAPTIST HUNGARIAN GREEK CATHOLIC CHURCH
THE EVANGELICAL ALLIANCE MISSION OF CANADA INC.
THE GOOD NEWS BROADCASTING ASSOCIATION OF CANADA
THE INCORPORATED SYNOD OF THE DIOCESE OF OTTAWA
THE LIGHT KOREAN PRESBYTERIAN CHURCH (ISLINGTON)
THE NAVIGATORS OF CANADA
UNITED CHURCH OF CANADA

UNITED PENTECOSTAL CHURCH

UNITED PENTECOSTAL CHURCH

WORLD RELIEF CANADA

ARAB WORLD MINISTRIES IN ONTARIO

CAMPUS CRUSADE FOR CHRIST OF CANADA, INC.

*CANADIAN FRIENDS OF HAKEREM

*CANADIAN FRIENDS OF LANIADO HOSPITAL

CANADIAN JESUIT MISSIONS SUBSIDIARY OF JESUIT FATHERS OF UPP

CHRISTIAN NATIONALS EVANGELISM MISSION

CHURCH OF GOD IN CANADA

COALDALE MENNONITE BRETHERN CHURCH

CREDIT COUNSELLING SERVICES OF COCHRANE DISTRICT

*DR. AND MRS. MAX STERN FOUNDATION

EVERYDAY PUBLICATIONS INC.

FEDERATION OF CANADIAN MUNICIPALITIES - FEDERATION CANADIENNE DES MUNICIPALITES

GERMAN GOSPEL MISSION OF CANADA

GLENVIEW PRESBYTERIAN CHURCH

INTERNATIONAL MISSIONS IN ONTARIO INC.

*JEWISH HERITAGE FOUNDATION OF CANADA

*THE KAHANOFF FOUNDATION

*LE COMITE CANADIEN DU COLLEGE SHENKAR EN ISRAEL INC.-THE CANADIAN COMMITTEE FOR SHENKAR COLLEGE IN ISRAEL INC.

MCDIARMID DRIVE ALLIANCE CHURCH

MIDDLE EAST CHRISTIAN OUTREACH (CANADA)

HERITAGE UNITED CHURCH

NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF CANADA

NORTH SHORE ALLIANCE CHURCH

OPEN DOORS WITH BROTHER ANDREW, INC.

PONTIFICAL ASSOCIATION OF THE HOLY CHILDHOOD OF CANADA

ROTARY FOUNDATION CANADA

ST JAMES PRESBYTERIAN CHURCH

ST JOHN'S CHURCH

ST PAUL'S LUTHERAN CHURCH

THE DAVID HOFSTEDTER FAMILY FOUNDATION

THE LEPROSY MISSION CANADA

THE MISSIONARIES OF CHARITY (MANITOBA) INC.

THE NORTH-SOUTH INSTITUTE L'INSTITUTE NORD-SUD

*THE TENENBAUM CHARITABLE FOUNDATION

THE UNIVERSITY OF MANITOBA

THE ROMAN CATHOLIC BISHOP OF THUNDER BAY

THE ROMAN CATHOLIC BISHOP OF THUNDER BAY

UPPER KENT UNITED PENTECOSTAL CHURCH,

VINELAND UNITED MENNONITE CHURCH

WESLEY UNITED CHURCH

WESTON GOSPEL CHURCH

YMCA OF GREATER TORONTO

INTERAMICUS

EGLISE EVANGELIQUE BAPTISTE ARABE DE MONTREAL

THE KLEMKE FOUNDATION

*CANADIAN FOUNDATION FOR MASORTI JUDAISM

EVERY HOME FOR CHRIST INTERNATIONAL

ST ANDREW'S PRESBYTERIAN CHURCH

CHRISTIAN AID MISSION

INTERNATIONAL COUNCIL FOR ADULT EDUCATION

LA REVUE DE DROIT DE MCGILL/THE MCGILL LAW JOURNAL

ASSOCIATION OF BAPTISTS FOR WORLD EVANGELISM IN CANADA

FT SASKATCHEWAN CHURCH OF THE NAZARENE

PARISH OF FRANKFORD / GLEN MILLER

EVANGELICAL LUTHERAN CHURCH OF SELKIRK

CANADIAN FOOD FOR THE HUNGRY INTERNATIONAL

THE BACK TO GOD HOUR OF THE CHRISTIAN REFORMED CHURCH

WILLOWDALE CHRISTIAN ASSEMBLY

*CANADIAN FRIENDS OF JERUSALEM ELWYN

MANNVILLE MINBURN PASTORAL CHARGE

THE CHRISTIAN AND MISSIONARY ALLIANCE IN GEORGETOWN

GRACE BAPTIST CHURCH INC

CAW SOCIAL JUSTICE FUND/LES FONDS DE JUSTICE SOCIALE DES TCA

SOUTHSIDE CHRISTIAN ASSEMBLY

THE CENTRAL CANADIAN DISTRICT OF THE CHRISTIAN AND MISSIONARY ALLIANCE IN CANADA

ASSOCIATION OF CHINESE EVANGELICAL MINISTRIES-CANADA

*CANADIAN FRIENDS OF THE JERUSALEM COLLEGE OF TECHNOLOGY, SCHOOL OF APPLIED SCIENCES

BANNER OF LOVE MINISTRIES INTERNATIONAL

OPEN DOOR CHRISTIAN FELLOWSHIP

J.B. BRASS OF CANADA

THE PRIMATE'S WORLD RELIEF AND DEVELOPMENT FUND/ LE FONDS DU PRIMAT POUR LE SECOURS ET
LE DEVELOPPEMENT MONDIAL

KABUKI SYNDROME NETWORK INC

KABUKI SYNDROME NETWORK INC

SHOFAFR (MELEKET) INTERNATIONAL MINISTRIES

SASKATCHEWAN WOMEN IN MISSION

ALLIANCE WOMEN'S MINISTRIES (AWM) EASTERN CANADIAN DISTRICT

SOMECH NOFLIM CHARITABLE ORGANIZATION

FINNISH PENTECOSTAL CHURCH

WAR CHILD CANADA

FIRST BAPTIST CHURCH, GUELPH

THE MISSIONARIES OF CHARITY INC.

SAVE A CHILD'S HEART FOUNDATION

PALESTINE EDUCATION FOUNDATION (ONTARIO)

SASKATCHEWAN VALLEY CHURCH OF THE CHURCH OF GOD IN CHRIST, M

INTERNATIONAL RELIEF FUND FOR THE AFFLICTED AND NEEDY (CANAD

AMNESTY INTERNATIONAL KITSILANO GROUP 52

THE CANADIAN ASSOCIATION FOR MINE AND EXPLOSIVE ORDNANCE SECURITY

THE MONTHLY FUND OF EMES CHARITABLE FOUNDATION

*THE KLAL FOUNDATION

*CANADIAN FRIENDS OF DARCHE NOAM

CHURCH ON THE SOUTHSIDE

THE WOMEN'S MISSIONARY SOCIETY, WESTERN DIVISION, EAST TORONTO PRESBYTERIAL

TISDALE ALLIANCE CHURCH

JERUSALEM VISTAS CANADA SOCIETY

*CANADIAN FRIENDS OF SHA'ALVIM EDUCATIONAL CENTRE

THE CANADA-INTERNATIONAL SCIENTIFIC EXCHANGE PROGRAM (CISEPO

THE WOODBRIDGE PENTECOSTAL CHURCH

*OR CHADASH

INSTITUTE FOR MIDDLE EAST PEACE AND DEVELOPMENT

*NATHAN & SHANI BLEEMAN CHARITABLE FOUNDATION

*THE CANADIAN COMMITTEE FOR THE HAIFA FOUNDATION

FONDATION QUEBEC-LABRADOR DU CANADA INC

UNIVERSAL AIDE SOCIETY

*LINAS TZEDEK CHARITABLE FOUNDATION

*HALACHA L'MOSHE TALMUDIC INSTITUTE

*CANADIAN FRIENDS OF THE ISRAEL MUSEUM

IMPACT GUELPH

*THE CANADIAN FRIENDS OF BIKUR CHOLIM HOSPITAL OF JERUSALEM

*SHIMON & DEENA SMURSZ CHARITABLE FOUNDATION

INTERNATIONAL COUNCIL FOR CONTROL OF IODINE DEFICIENCY DISORDERS/CONSEIL INTERNATIONAL
POUR LE CONTROLE DES TROUBLES DUSA LA DEFICIENCE EN IODE

DEREK PRINCE MINISTRIES ASSOCIATION

MEDICAL MINISTRY CANADA INC.

WEST SHORE PRESBYTERIAN CHURCH

INTERNET: INTERNATIONAL HUMAN RIGHTS DOCUMENTATION NETWORK

*LES & MINDA FELDMAN CHARITABLE FOUNDATION

LIGHT FOR ALL NATIONS MINISTRIES

THE BURLINGTON CHRISTIAN REFORMED CHURCH

COMMISSARIAT DE TERRE SAINTE AU CANADA/COMMISSARIAT OF THE HOLY LAND IN CANADA

OXFAM-QUEBEC

ORGANISATION CANADIENNE POUR LA SOLIDARITE ET LE DEVELOPPEMENT - OCSD

CORPORATION DE L'ECOLE DES HAUTES ETUDES COMMERCIALES DE MONTREAL

ORGANISATION CATHOLIQUE CANADIENNE POUR LE DEVELOPPEMENT ET LA PAIX/CANADIAN CATHOLIC ORGANIZATION FOR DEVELOPMENT AND PEACE

LES PARTENAIRES DE L'ASSOCIATION DE LA HAUTE-EGYPTE POUR L'EDUCATION ET LE DEVELOPPEMENT (PACHE)

ALTERNATIVES RESEAU D'ACTION & COMMUNICATION POUR LE DEVELOPPEMENT INTERNATIONAL INC

C.I.M.E. CENTRE INTERNATIONAL DE MUSIQUE EVANGELIQUE

EGLISE BAPTISTE EVANGELIQUE DU SAGUENAY

EGLISE BAPTISTE EVANGELIQUE D'AHUNTSIC

ORGANISATION CANADIENNE POUR LA SOLIDARITE ET LE DEVELOPPEMENT - OCSD

NORMAN'S COVE PASTORAL CHARGE

2005 T3010 - Jewish and Israeli Charities in Canada by Expenditures outside

of Canada (over \$10,000)

| | |
|---|--------------|
| UNITED ISRAEL APPEAL OF CANADA INC | \$33,659,556 |
| VAAD MISHMERES MITZVOS-COMMITTEE TO OBSERVE THE TORAH LAWS | \$10,636,646 |
| THE CRB FOUNDATION-LA FOUNDATION CRB | \$6,291,468 |
| JEWISH NATIONAL FUND OF CANADA (KEREN KAYEMETH LE'ISRAEL) INC. | \$5,006,836 |
| CHOSON KALLAH FUND OF TORONTO | \$4,124,905 |
| CANADIAN SHAARE ZEDEK HOSPITAL FOUNDATION/FONDATION CANADIENNE DE L'HOPITAL SHAARE ZEDEK | \$4,119,900 |
| CANADIAN FRIENDS OF MOSOOS CHASIDEI BELZ | \$3,537,206 |
| HADASSAH-WIZO ORGANIZATION OF CANADA - L'ORGANISATION HADASSAH-WIZO DU CANADA | \$3,167,010 |
| THE KAHANOFF FOUNDATION | \$3,028,890 |
| FRIENDS OF SIMON WIESENTHAL CENTER FOR HOLOCAUST STUDIES | \$2,987,283 |
| COLEL CHABAD LUBAVITCH FOUNDATION OF LES AMIS CANADIENS DE TORAH VYIRAH | \$2,557,845 |
| RABBINICAL COLLEGE | \$2,495,166 |
| THE KLAL FOUNDATION | \$2,412,280 |
| MIFAL KLITA | \$2,345,589 |
| CANADIAN FRIENDS OF ZEFAT | \$2,233,565 |
| CANADIAN FOUNDATION FOR THE EDUCATION AND WELFARE OF JEWS OF THE C I S | \$1,968,515 |
| THE CANADIAN ZIONIST CULTURAL ASSOCIATION | \$1,634,757 |
| CANADIAN FRIENDS OF MISHON LA'CHOLEH | \$1,492,093 |
| BEIT HALOCHEM CANADA/AID TO DISABLED VETERANS OF ISRAEL (CANADA) | \$1,225,021 |
| CANADIAN MAGEN DAVID ADOM FOR ISRAEL | \$1,203,355 |
| CANADIAN SOCIETY FOR YAD VASHEM | \$1,156,569 |
| LES AMIS CANADIENS DU SEMINAIRE YESHIVAH MIRER DE JERUSALEM INC./CANADIAN FRIENDS OF THE SEMINARY YESHIVAH MIRER OF JERUSALEM | \$1,142,850 |
| CANADIAN FRIENDS OF TORAH AND EMUNAH | \$1,103,308 |
| INSTITUTE OF RESEARCH FOR BIBLICAL TALMUDIC LAW | \$928,851 |
| CANADIAN FRIENDS OF KIRYAT CHINUCH LEBANIM | \$832,483 |
| THE CANADIAN SOCIETY FOR THE WEIZMANN INSTITUTE OF SCIENCE | \$805,357 |
| KOLEL YESHIVAT KEHILAT JACOB | \$778,837 |
| TORAH SCHOOLS FOR ISRAEL, | \$769,213 |
| CANADIAN FRIENDS OF JEWISH HERITAGE EDUCATIONAL CENTER | \$734,241 |
| CANADIAN FRIENDS OF UNITED TALMUDICAL ACADEMY OF MONSEY | \$730,200 |
| SOMECH NOFLIM CHARITABLE ORGANIZATION | \$692,018 |
| CANADIAN FRIENDS OF NOAM ELIMELECH | |

| | |
|--|-----------|
| CANADIAN FRIENDS OF THE ISRAEL MUSEUM | \$671,477 |
| CANADIAN FRIENDS OF TOLDOS AHARON | \$622,440 |
| MEHADURAS FRIEDMAN FOUNDATION | \$610,080 |
| CANADIAN FRIENDS OF THE INSTITUTE OHOLEI TORAH | \$606,180 |
| CANADIAN ASSOCIATION FOR LABOR ISRAEL | \$595,688 |
| CANADA-ISRAEL CHILDREN'S CENTRES | \$554,773 |
| JEWISH HERITAGE FOUNDATION INTERNATIONAL | \$546,574 |
| CANADIAN FRIENDS OF CHABAD LUBAVITCH | \$527,306 |
| MISHMERET | \$493,600 |
| CANADIAN FRIENDS OF KEREN HATZOLOH | \$447,913 |
| ALEH REHABILITATION OF CANADA | \$384,000 |
| VE'AHAVTA: THE CANADIAN JEWISH HUMANITARIAN & RELIEF COMMITTEE | \$349,568 |
| HALACHA L'MOSHE TALMUDIC INSTITUTE | \$344,950 |
| CANADIAN FRIENDS OF LANIADO HOSPITAL | \$344,865 |
| CANADIAN FRIENDS OF ALYN | \$341,772 |
| CANADIAN FRIENDS OF SHALOM TORAH CENTER | \$331,557 |
| CANADIAN FRIENDS OF KOLLEL TIFERES YITZCHOK OF ALEKSANDER | \$329,993 |
| CANADIAN FRIENDS OF YAD ELIEZER | \$327,250 |
| NA'AMAT CANADA INC. | \$326,216 |
| CANADIAN FRIENDS OF SHEKEL HAKODESH OF NEW SQUARE | \$300,000 |
| THE CANADIAN FRIENDS OF OHR SOMAYACH - TANENBAUM CENTRE - COLLEGE OF JUDAIC INSTITUT YAVNE | \$297,550 |
| THE CANADIAN FRIENDS OF MERCAZ HATORAH | \$295,580 |
| THE CANADIAN ALUMNI OF BAIS HATALMUD, JERUSALEM | \$210,000 |
| CANADIAN FRIENDS OF SANZ INSTITUTIONS | \$205,535 |
| FRIENDS OF KIRYAT HAYELED, JERUSALEM | \$189,390 |
| REB MAYER BAAL HANES - CHIBAS JERUSALEM | \$185,446 |
| CANADIAN FRIENDS OF MESIVTA TORAH V'VIRAH OF U T A | \$185,000 |
| CANADIAN FRIENDS OF THE ZION ORPHANAGE AND EDUCATIONAL CENTRE | \$184,248 |
| CANADIAN FRIENDS OF COLLEL SQUARE | \$183,000 |
| LOMDEI TORAH PROGRAMS | \$179,674 |
| BOBEVER YESHIVA BNEI ZION CHARITABLE FUND | \$177,984 |
| CANADIAN FRIENDS OF MOSDOS BE'ER YITZCHAK / LES AMIS CANADIENS DE MOSDOS BE'ER YITZCHAK | \$172,325 |
| CANADIAN FRIENDS OF PASSAIC YESHIVA | \$163,670 |
| CANADIAN FRIENDS OF MESIVTA TORAH TEMIMAH | \$162,977 |
| KESHER OUTREACH ORGANIZATION | \$161,513 |
| | \$158,000 |

| | |
|--|-----------|
| CANADIAN FRIENDS OF THE WORLD UNION FOR PROGRESSIVE JUDAISM AMIS CAN DE LUNION MOND JUDAI | \$154,356 |
| CANADIAN FRIENDS OF YESHIVAT HAR ETZION / LES AMIS CANADIENS YESHIVAT HAR ETZION | \$145,338 |
| CHASIEDAI GER | \$145,151 |
| LISHMOA LILMOD U'LELAMED | \$141,416 |
| CANADIAN FRIENDS OF KUPAT HAIR | \$139,266 |
| CANADIAN FRIENDS OF NISHMAT/AMIS CANADIENS DE NISHMAT | \$134,449 |
| THE CANADIAN COMMITTEE FOR THE HAIFA FOUNDATION | \$130,628 |
| CANADIAN FOUNDATION FOR MASORTI JUDAISM | \$125,870 |
| JEWISH EDUCATIONAL SERVICES | \$123,350 |
| CANADIAN FRIENDS OF ZICHRON MOSHE | \$115,163 |
| CANADIAN FRIENDS OF YESHIVATH HADAROM | \$114,670 |
| CANADIAN FRIENDS OF YAD LACHIM | \$112,605 |
| LA CORPORATION DU CENTRE DES HAUTES ETUDES TALMUDIQUE DU MONT SION/CORPORATION OF MOUNT-ZION CENTRE FOR HIGHER EDUCATION | \$105,037 |
| CANADIAN FRIENDS OF UNITED WIZNITZ INSTITUTIONS IN ISRAEL | \$103,456 |
| MESORAH HERITAGE FOUNDATION OF CANADA | \$101,729 |
| CANADIAN SCHOLARSHIP FUND OF OHR HAMEIR | \$101,246 |
| CANADIAN FRIENDS OF CENTRAL RABBINICAL SEMINARY | \$99,500 |
| CANADIAN FRIENDS OF YESHIVATH BIRKAT MOSHE-MAALEH ADUMIM LES AMIS CANADIENS YESHIVATH BIRKAT MOSHE-MALLEH ADUMIM | \$95,219 |
| CANADIAN FRIENDS OF BETH JOSEPH ZVI | \$95,000 |
| AGUDAS TOMCHEI NACHAL NOVEA | \$94,800 |
| CANADIAN FRIENDS OF MICHLALAH | \$94,000 |
| LEMA'AN ZION | \$89,778 |
| CANADIAN FRIENDS OF CUBAN JEWRY | \$88,577 |
| CANADIAN FRIENDS OF KASHAU | \$85,851 |
| CANADIAN FRIENDS OF ILAN FOUNDATION FOR HANDICAPPED CHILDREN | \$85,000 |
| THE TOR-DER FUND | \$83,660 |
| CANADIAN FRIENDS OF BETH CHANA | \$83,585 |
| CANADIAN FRIENDS OF CHABAD OF TIBERIAS INC / LES AMIS CANADIENS DE CHABAD DE TIBERE INC | \$78,116 |
| CANADIAN FRIENDS OF YESHIVAS NOVOMINSK | \$76,613 |
| CANADIAN FRIENDS OF DARCHE NOAM | \$76,000 |
| CANADIAN FRIENDS OF LELOV YESHIVAH | \$75,083 |
| CHABAD LUBAVITCH OF SOUTHERN ONTARIO | \$73,138 |
| CANADA ISRAEL CULTURAL FOUNDATION | \$70,875 |

| | |
|--|----------|
| THE MONTHLY FUND OF EMES CHARITABLE FOUNDATION | \$68,510 |
| CANADIAN FRIENDS OF YESHIVAT AISH HATORAH | \$67,620 |
| EZRAS PLEITIM CANADIAN ASSOCIATION | \$65,426 |
| CANADIAN FRIENDS OF YESHIVAT WIZNITZ OF BNEI BRAQ | \$63,000 |
| THE YESHIVAH SCHOLARSHIP FUND OF ISRAEL | \$59,630 |
| TEMPLE SHOLOM | \$59,613 |
| CANADIAN FRIENDS OF BENE BERAQ HOSPITAL | \$59,463 |
| CANADIAN FRIENDS OF MAOZ SOCIETY | \$58,655 |
| CANADIAN FRIENDS OF THE SHALOM HARTMAN INSTITUTE/AMIS CANADIENS DE L'INSTITUT SHALOM HARTM | \$57,433 |
| FONDATION B'NAI LEVY/B'NAI LEVY FOUNDATION | \$54,276 |
| CANADIAN FRIENDS OF KOLEL EMES V'EMUNAH WIZNITZ | \$48,696 |
| THE HAICHEL HATORAH B'ZION FOUNDATION | \$47,733 |
| CANADIAN FRIENDS OF ZECHUTA D'ABRAHAM | \$47,000 |
| SHALOM ACHSHAV PEACE FOUNDATION | \$46,500 |
| CANADIAN FRIENDS OF TORAH ACADEMY | \$46,131 |
| CANADIAN FRIENDS OF TOMCHE DALIM | \$45,500 |
| CANADIAN FRIENDS OF MAOR GERSHON SCHOLARSHIP KOLLEL | \$45,471 |
| CANADIAN FRIENDS OF HAKEREM | \$44,000 |
| CANADIAN ALUMNI ASSOCIATION OF SLOBODKER YESHIVA | \$43,000 |
| CANADIAN FRIENDS OF JEWISH COMMUNITY OF GREATER STOWE | \$42,290 |
| CANADIAN FRIENDS OF FRENCH HILL COMMUNITY CENTER | \$41,165 |
| THE CHABAD REHOVOT FUND | \$40,700 |
| CANADIAN FRIENDS OF NEW ENGLAND RABBINICAL COLLEGE | \$40,303 |
| CANADIAN FRIENDS OF SHALVA ISRAEL ASSOCIATION | \$40,000 |
| KUPATH RAMBAN CANADA | \$38,500 |
| CANADIAN JEWISH CONGRESS - CHARITIES COMMITTEE | \$37,982 |
| CANADIAN FRIENDS OF EZRAS TORAH | \$36,819 |
| THE CANADIAN FRIENDS OF BAIS YISROEL | \$36,186 |
| CHABAD'S CHILDREN OF CHERNOBYL/CHABAD ENFANTS DE TCHERNOBYL | \$36,000 |
| CANADIAN FRIENDS OF BETH RIVKA SCHOOLS | \$35,699 |
| JEWISH COMMUNITY CENTRE OF GREATER VANCOUVER | \$34,219 |
| ZIV TZEDAKAH FOUNDATION | \$33,161 |

| | |
|---|----------|
| COMMONWEALTH JEWISH FOUNDATION OF CANADA | \$32,233 |
| CANADIAN FRIENDS OF BETH HATALMUD | \$31,414 |
| CANADIAN FRIENDS OF SHOR YOSHUV RABBINICAL COLLEGE | \$31,304 |
| CANADIAN FRIENDS OF DENTAL VOLUNTEERS FOR ISRAEL | \$30,293 |
| MESIVTA BETH SHRAGA CANADA | \$30,268 |
| THE CANADIAN FRIENDS OF YESHIVA D'MONSEY OR CHADASH | \$30,000 |
| CANADIAN FRIENDS OF A.V. ISRAEL | \$30,000 |
| JERUSALEM DENTAL CENTRE FOR CHILDREN INC. | \$29,500 |
| CANADIAN FRIENDS OF ISRAEL ELWYN | \$29,060 |
| CANADIAN FRIENDS OF KIRYAS JOEL MONROE | \$27,000 |
| CANADIAN FRIENDS OF LANIADO HOSPITAL, ONTARIO REGION | \$26,957 |
| CANADIAN FRIENDS OF BE'ER AVROHOM | \$25,300 |
| CANADIAN FRIENDS OF YESHIVATH SHAAREI ZION | \$24,600 |
| CANADIAN FRIENDS OF MOSDOS SPINKA IN ISRAEL | \$23,907 |
| AMIS CANADIEN/ CANADIAN FRIENDS OF/DE MOSDOS BETH YITZCHOK D'SPINKA | \$23,509 |
| CANADIAN FRIENDS OF YESHIVATH SHEARITH HAPLETAH | \$23,035 |
| CANADIAN FRIENDS OF YESHIVA LOMZA | \$23,000 |
| NATIONAL COUNCIL OF JEWISH WOMEN OF CANADIAN FRIENDS OF THE KOBY MANDELL FOUNDATION | \$20,610 |
| MAOR: AN ORGANIZATION TO PROMOTE STUDIES OF JEWISH LIFE | \$20,000 |
| CANADIAN FRIENDS OF MIFAL HASHAS | \$19,450 |
| CANADIAN FRIENDS OF KOLLEL AMERICA AND CANADA REG'D | \$18,351 |
| CANADIAN FRIENDS OF TIFERETH SHLOMO | \$17,900 |
| JEWISH RUSSIAN CHARITY FUND (CHAMAH) | \$17,280 |
| CANADIAN FRIENDS OF MESIVTA KESER TORAH | \$16,518 |
| CANADIAN FRIENDS OF MOSDOS OR HATORAH | \$16,000 |
| CANADIAN FRIENDS OF MEKOR CHAIM ACADEMY | \$15,400 |
| CANADIAN FRIENDS OF ISRALIGHT | \$13,000 |
| KEREN HAYELED CHARITABLE ORGANIZATION | \$12,500 |
| CANADIAN FRIENDS OF GIVAT HAVIVA | \$11,688 |
| RABBI MAIER BAAL HANESS KOLEL SIEBENBURGEN | \$11,390 |
| | \$10,921 |