

# GLOBAL

CREDIT COLLECTION

November 17, 2008

Mr. Brian Pitkin, CD ; Registrar  
Consumer Protection Branch  
5775 Yonge Street, Suite 1500  
Toronto, Ontario  
M7A 2E5

Re: Lawyers Letter / Draft Statement of Claim

Dear Mr. Pitkin,

This letter is in response to your correspondence of October 27, 2008 and a follow up to our meeting of November 13<sup>th</sup>.

Global appreciated your letter, which identifies a practice that is carried out by various agencies that have not followed the appropriate rules and regulations which had been set forth by your Ministry, regarding misleading practices and separation of duties in the application of legal letters.

Global has not participated in the program as outlined by your letter and has invested substantial resources to ensure compliance with the Collection Agencies Act and specifically as it pertains to this matter.

Global's process is as follows;

Global has client authorization to initiate legal action on behalf of the designated creditor.

Global employs various algorithms, scorecards and processes which assist in determining best course of action with respect to each account.

Global forwards the qualified collection account to the designated lawyer based on region with instructions to resolve account.

Each lawyer utilized by Global is duly licensed and wholly independent of Global, with a separate office, separate payroll, and separate phone numbers.

The lawyer then assumes carriage of the account and applies the appropriate treatment, which may include a demand letter, a demand letter with a DSOC attachment or the initiation of litigation.

Involvement is strictly limited to the designated lawyer and staff with all calls and correspondence handled by said office, with no interaction by Global employees.

As stated by you at our meeting, our process as described, meets with the Ministry and your approval.

We appreciate your time and input to clarify this situation for Global and its clients.

If any further information is required, with respect to this matter or any other operative issues, please do not hesitate in contacting me directly.

Yours truly,

Manny Zeligman  
Chief Compliance Officer  
(905) 413-8532