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June 25, 2004

BY FAX

KPMG Inc.
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Vancouver, BC V7Y 1K3

McLean & Armstrong
Barristers and Solicitors
701 - 100 Park Royal South
West Vancouver, BC V7T 1A2

Attention: David Wood

Attention: Brian G. McLean

Dear Sirs:

Re: Bankruptcy of Erwin Singh Braich

We have been working with our client to ensure that he fulfils the requirements of the Order of Madam Justice Morrison made March 31, 2004. Those requirements were ordered primarily at the request of Mr. McLean, acting on behalf of the trustee, KPMG despite our complaints that Mr. McLean was in a conflict of interest because he acts for the petitioning creditor.

Our client has been hampered in his attempt to comply with the March 31 because numerous personal and financial documents in his possession which he needs to accurately complete the Statement of Affairs and subject to production to the Trustee were seized by the Washington Department of Financial Institutions sometime prior to the hearing of March 31. We have not received a warrant for the seizure of the documents or an inventory of the documents seized and are at a loss as to why this department would have an interest in Mr. Braich or his documents.

A lawyer from the state of Washington has been retained to retrieve the documents so that our client can complete his duties under the *Bankruptcy and Insolvency Act* and fulfil the requirements of Madam Justice Morrison's Order.

Further to our telephone conversation with Mr. Wood earlier today, we understand that you have been in contact with the Department of Financial Institutions and that the documents may have been seized at your instigation and may be produced to you rather than returned to our client.

We are extremely concerned that you did not bring this to the attention of Madam Justice Morrison at the hearing on March 31, particularly given the arrest warrants outstanding at the time. In our view the seizure and its circumstances would have been critical to Madam Justice Morrison's decision to Order our client to prepare his Statement of Affairs, produce documents and to permit Mr. McLean to speak to the matter on behalf of the Trustee. There was no

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indication given by you to the Court that our client's documents may not be available to him for him to comply with the Order made.

We demand that you produce to us all correspondence and documents relating to your dealings with the Department of Financial Institutions and advise us of your involvement with respect to this matter so that bring the matter to the attention of the Court, if necessary, and so that we may review whether there has been a breach of the *Personal Information Protection and Electronic Documents Act*.

We put you on notice that some of the material seized is not producible to you as Trustee in Bankrupt and is personal in nature. It is our position that the documents ought to be returned to our client and then the documents required to be produced in the bankruptcy proceeding disclosed to you so that our client's privacy and personal information is protected. Please advise us of your position with respect to this matter.

Yours truly,

HARPER GREY EASTON

Per: Katherine M. Wellburn

KMW/pf