

RSM Richter

**Supplement to the Fourth Report to
Court of RSM Richter Inc. as Receiver of
the Estate of Robert Mander, E.M.B.
Asset Group Inc. and Related Entities**

RSM Richter Inc.
Toronto, July 9, 2010

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**ONTARIO
SUPERIOR COURT OF JUSTICE
(COMMERCIAL LIST)**

B E T W E E N:

SA CAPITAL GROWTH CORP.

Applicant

- and -

**CHRISTINE BROOKS AS EXECUTOR OF THE ESTATE OF ROBERT MANDER,
DECEASED AND E.M.B. ASSET GROUP INC.**

Respondent

**IN THE MATTER OF RULE 14.05(3)(G) OF THE *RULES OF CIVIL PROCEDURE*
AND SECTION 101 OF THE *COURTS OF JUSTICE ACT*, R.S.O. 1990, C. C.43,
AS AMENDED**

**SUPPLEMENT TO THE FOURTH REPORT OF
RSM RICHTER INC., AS RECEIVER**

July 9, 2010

1. INTRODUCTION

This report ("Supplemental Report") supplements the Receiver's Fourth Report to Court dated July 2, 2010 ("Fourth Report").

1.1 Defined Terms

Unless otherwise defined in this Supplemental Report, defined terms have the meaning provided to them in the Fourth Report.

1.2 Purpose of this Report

The purpose of this Supplemental Report is to recommend that the Court issue an order authorizing Peter R. Welsh, counsel to Robert Mander, and, the Receiver believes, to certain Investors and Related Entities, to provide the Receiver with any and all information regarding his retainers by Mr. Mander and the Related Entities.

1.3 The Issue

At the outset of these proceedings, the Receiver and its counsel contacted Mr. Welsh to obtain information concerning Mander and the Related Entities. Welsh provided certain information at that time and has done so periodically since then. Given the status of the proceedings, the Receiver recently contacted Mr. Welsh again in order to obtain further information concerning its investigation.

As previously reported by the Receiver, Robert Mander incorporated several companies through which he purported to carry on investment businesses. Also, the Receiver understands that Mr. Mander generally demanded that those that wished to invest with him, incorporate corporations that would act as the "spokes" in the transactions. In the course of its investigation, the Receiver has been advised that Mr. Welsh is the lawyer that incorporated all (or almost all) of the corporations used by Mr. Mander and the spokes. Indeed, the Receiver has been advised that Mr. Mander demanded that Mr. Welsh be used by all participants in his investment scheme.

Mr. Welsh is a solicitor that was called to the Bar in New Brunswick in 1973 and Ontario in 1977. He maintains his main office in Oakville, Ontario. Mr. Welsh serves as counsel to Aylesworth LLP (in Toronto) and to Feltmate Delibato Heagle, LLP (in Burlington).

The Receiver has asked to meet with Mr. Welsh and requested that he deliver all of the files in his possession or control that, in any way, relate to the business and affairs of Robert Mander and the Related Entities (as defined in the Fresh As Amended Receivership Order date March 31, 2010). Mr. Welsh, through his counsel, advised that he was willing to cooperate but had concerns regarding solicitor and client privilege. As a result, the Receiver agreed that it would seek an Order requiring Mr. Welsh to produce to the Receiver the requested files as well

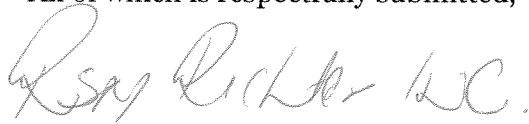
as an order authorizing Mr. Welsh to provide the Receiver with any and all information regarding his retainers by Mr. Mander and the Related Entities.

2. RECOMMENDATION

Based on the foregoing, the Receiver recommends that this Honourable Court issue the Order sought regarding Mr. Welsh.

* * *

All of which is respectfully submitted,

A handwritten signature in dark ink, appearing to read "RSM Richter Inc.", is written over the typed name.

**RSM RICHTER INC.
IN ITS CAPACITY AS RECEIVER OF
E.M.B. ASSET GROUP INC.,
THE ESTATE OF ROBERT MANDER
AND THE RELATED ENTITIES
AND NOT IN ITS PERSONAL CAPACITY**