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MEMORANDUM NOTE DE SERVICE

TO → Joan Korol - BCE
À Investigations & Coordination Unit
Ottawa

FROM Miles Brosseau
DE TPP Inspector
Calgary

SECURITY-CLASSIFICATION-DE SÉCURITÉ
OUR FILE - N/RÉFÉRENCE
YOUR FILE - V/RÉFÉRENCE
DATE Oct. 12, 2000

SUBJECT Investigation: RE: The Synergy Group Of Canada Inc.
OBJET

A letter dated July 24th was sent to the apparent Calgary address (609 - 14th St. N.W., Calgary, AB., T2N 2A1) by TPP Ottawa citing clinical trial and marketing violations.

As the company was apparently unresponsive to this letter the undersigned was requested to investigate. What follows is a chronology of the investigative activity taken by the undersigned to date.

September 27, 2000

A visit was made to the Calgary office address as indicated by the above noted letter sent by TPP, Ottawa. The address was a 5 storey office building. There was no listing of this company in the building directory and a physical search was made of each floor. A few inquiries were made with various occupants but they were not familiar with the name of Synergy.

Buildings on both sides of the street were searched for a few blocks but there wasn't any sign of the company. One inquisitive individual remarked that the name sounded familiar but could not offer anything of substance.

September 27, 2000

Donna Pura, inspection assistant, identified a company by the name of Synergea located at 5403 Crowchild Trail N.W., Calgary, but after visitation by the undersigned it was identified as a chiropractic office of no affiliation.

The City of Calgary, Licences and permits was contacted. No license had been issued to The Synergy Group of Canada Inc. and no other information was on record about the company

A corporate search was made (see 2 page attachment) revealing the Legal Entity Name as, The Synergy Group of Canada Inc..

Registered Office: 635 - 2nd Ave. W., Cardston, AB. T0K 0K0

Mailing Address: Box 1254, Cardston, AB. T0K 0K0

Directors:

David L. Hardy - P.O. Box 722, Raymond, AB. T0K 2S0

Anthony F. Stephan - 635-2nd Ave. W., Cardston, AB. T0K 0K0

Voting Shareholders:

David Lawrence Hardy-164 W. 1st Ave. N., Raymond, AB. T0K 2S0

Anthony F. Stephan - 635-2nd Ave. W., Cardston, AB. T0K 0K0

24(1)

An attempt was made to contact a Synergy Research Assistant using the toll free number of 1-877-549-3777 as indicated on their company's website, www.truehope.com. A message was left on an answering machine that the undersigned could be contacted by pager and the pager number was left with them after requesting contact.

24(1)

The name of Anthony Stephan was familiar and a search of our

The affiliation was not understood at that time. It is believed to be the same individual named Anthony Stephan.

19(1)

Via Synergy's website, an e-mail was sent from the undersigned's residence later in the evening under the name of _____ using [hotmail.com](mailto:_____@hotmail.com). The e-mail was made as an individual interested in obtaining more information about the company, their products, and a Calgary address for the treatment of anxiety and panic attacks.

October 3, 2000

24(1)

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The undersigned asked Mr. _____ who had ownership of the product. _____ said that Synergy knew what ingredients had to go into the product but that it was formulated in the USA. He concluded therefore that Synergy owned the product because it held the intellectual properties to it.

19(1)

Mr. _____ advised that the undersigned would be contacted in a few days after receiving the shipment to see if there were any other questions. _____ also noted that there would be an announcement on CTV at 11 PM that night and Canada AM the next morning. Mr. _____ was advised that an announcement was not seen the previous night.

An e-mail was received on hotmail from an Autumn Stringam (copy attached), identifying herself as a research assistant with Synergy and also a participant in the program. She advised that she could provide assistance in starting on the program and that the product is sold through the US manufacturer. The e-mail further noted that the Synergy Website is aimed at research so they directly avoid "product promotion" however, all of the participants in the program use the very same supplement.

CTV Announcement

There was an announcement on the 11 PM news that the University of Calgary did a small study with 10 people for the treatment of bi-polar disorder (i.e. manic depression). The results of the study appeared positive and were sent to the Canadian Psychiatric Association.

It was a vitamin/mineral product developed after Anthony Stephan's spouse committed suicide. His son & daughter were also suffering from this mental disorder. Mr. Stephan noticed that the nutrients were given to pigs for nervousness, so he tried a variation on his children and it helped.

The U of C investigators were reported as Dr. Bonnie Kaplan and Dr. Steven Simpson. One of the participants in the U of C study was a Steve Morton.

It was said that the Alberta Gov't was to provide more than ½ a million dollars to fund more study.

October 5, 2000

The toll free number of 1-888-878-3467 was used to get the tracking number for the shipment. The tracking number was 1Z63W9176645320306.

Canada AM announcement

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The content was basically the same. It noted that both the son and daughter had been better for the last 4 years and that most patients were able to decrease their standard drug usage for two-thirds.

This supplementary information was said to have been supplied by **Avis Favaro, CTV Medical Reporter.**

October 6, 2000

The shipment was held for pickup at UPS depot in Calgary and picked up in the afternoon after clearing customs.

The packing slip (copy attached) shows the product as coming from

**Evince International
1270 South 3030 West
Salt Lake City, Utah
84104**

The invoice (copy attached) shows the product as coming from:

**Nvision
1270 South 3030 West
Salt Lake City, Utah
84104**

2 x 448 capsules were received. The lot no. of one was 01213601 (exp. 03/02) and the other was lot 01229402 (exp. 05/02).

A "Nutritional Supplement Support Book" was also received. It has sections on Side Effects, Conflicts with Medications, Adverse Drug Reaction, Withdrawal, Response Times, Substances to avoid, Pregnancy, and others. The back cover says to contact Dana R. Stringam for further information at the email address of dstring@home.com. A copy of the 15 page booklet can be faxed if desired.

The product, called **E.M.Power** contains vitamins, minerals, plant nutrients, etc. A copy of the label is attached. The label indicates that it is manufactured for **The Synergy Group of Canada Inc.** by **Evince International L.L.C.** of Farmington, Utah.

The Maintenance dosage on the label is 8 capsules twice daily or 4 capsules four times a day.

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The Calgary Sun Article

Attached is a copy of an article entitled, "Progress from loss". The article notes that Dr. Bonnie Kaplan will lead a two year study of 100 patients with bipolar disorder.

The article notes that Anthony Stephan's daughter Autumn and his son Joseph were clear of symptoms within 30 days after initially trying his formula on the children.

Anthony Stephan and his partner, David Hardy, went to Dr. Brian Kolb, a neurologist from the University of Lethbridge, who subsequently tested the supplement on 4 others with encouraging results.

The article reports that Mr. Anthony Stephan and Mr. David Hardy are conducting their own trials on about 700 people.

October. 12, 2000

The Alberta College of Physicians was contacted about Dr. Bonnie Kaplan and Dr. Steven Simpson. Their registry of licensed practitioners does not contain either name.

Conclusions and Recommendations

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It is possible that the July 24th, 2000 advisory letter was never received by the Synergy Group of Canada since a Calgary office could not be found and Mr. indicated that there was none.

The operation seems to be very much family oriented as it is believed there could be a relationship between Autumn Stringam, and Dana Stringam, and Anthony Stephan.

It seems it's becoming a high media attentive and responsive issue noting the television segments and newspaper article.

As it's reported that Synerov has about 700 participants in the their own study and the

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Of note is that while the labelling of the product indicates the dosage as a total of 16 capsules daily in divided dosages, the verbal instructions were to start with 32 capsules daily. The label indicates that a serving of 8 capsules provides 3,333 IU of Vitamin A. Therefore at 32 capsules initially the consumption of Vitamin A would be greater than 13,000 IU. At this higher dosage it could

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be a Schedule F Product.

Boron would also be seen as an undesirable ingredient.

Now that the registered address of the Synergy Group is known perhaps correspondence should be sent again to that address. This report is submitted for your evaluation and consideration of what steps should be taken next.

Miles Brosseau