

Exhibit A



Secretary of State Administration Elections Business Programs Political Reform Archives Registries

Business Entities (BE)

Online Services

- E-File Statements of Information for Corporations
- Business Search
- Processing Times
- Disclosure Search

Main Page

Service Options

Name Availability

Forms, Samples & Fees

Statements of Information (annual/biennial reports)

Filing Tips

Information Requests (certificates, copies & status reports)

Service of Process

FAQs

Contact Information

Resources

- Business Resources
- Tax Information
- Starting A Business

Customer Alerts

- Business Identity Theft
- Misleading Business Solicitations

Business Entity Detail

Data is updated to the California Business Search on Wednesday and Saturday mornings. Results reflect work processed through Tuesday, March 4, 2014. Please refer to [Processing Times](#) for the received dates of filings currently being processed. The data provided is not a complete or certified record of an entity.

Entity Name:	THE TULVING COMPANY, INC.
Entity Number:	C1488964
Date Filed:	10/25/1990
Status:	ACTIVE
Jurisdiction:	CALIFORNIA
Entity Address:	PO BOX 6200
Entity City, State, Zip:	NEWPORT BEACH CA 92658
Agent for Service of Process:	HANNES TULVING JR
Agent Address:	750 W 17TH ST STE A
Agent City, State, Zip:	COSTA MESA CA 92627

* Indicates the information is not contained in the California Secretary of State's database.

- If the status of the corporation is "Surrender," the agent for service of process is automatically revoked. Please refer to California Corporations Code [section 2114](#) for information relating to service upon corporations that have surrendered.
- For information on checking or reserving a name, refer to [Name Availability](#).
- For information on ordering certificates, copies of documents and/or status reports or to request a more extensive search, refer to [Information Requests](#).
- For help with searching an entity name, refer to [Search Tips](#).
- For descriptions of the various fields and status types, refer to [Field Descriptions and Status Definitions](#).

[Modify Search](#) [New Search](#) [Printer Friendly](#) [Back to Search Results](#)

Exhibit B

The Tulving Company

Open 24 Hours A Day - 7 Days A Week

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Quick Links To Some Of Our Most Popular Items



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[BU Any Date Canadian Maple Leaf 1 Oz Gold Spot + \\$19.95](#)
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 With Your Name, Address, and Phone Number

Website Links

[Bullion Buy / Sell Prices - All Items In Stock](#)

[More Bullion Items We Purchase](#)

[Tulving Company Wiring Instructions](#)

[Selling / Shipping Your Bullion To Us At No Cost To You](#)
 New Instructions As Of 12/13/12 (Saving You Money And Time!!)

[Buying Bullion For Your IRA Info / Instructions](#)

[International / Overseas Customers Info / Instructions](#)

[Precious Metals Depository Storage Info](#)

[Tulving Company Hours Of Operation - We Are Open 24/7](#)

[Customer Testimonials](#)

[How We Sell Bullion For Less](#)

General Info

Hours of Operation (For orders only)
 Open via E-mail 24 hours a day, 7 days a week, including all holidays.
 E-Mail hannes@tulving.com
 Orders by phone: Monday thru Friday - 6:00am to 6:00pm PST
 (See new schedule on our [bullion page](#)).
 Our phone number is 800 995-1708.

Company Info:
 The Tulving Company - U.S. and International Bullion Sales
 Free, faster overnight shipping of all products at low prices
 P.O. Box 6200, Newport Beach, CA 92658
 800-995-1708 (US and Canada), FAX 949-722-0296
 International callers 949-722-0290
 e-mail hannes@tulving.com

Shipping Info:
 The Tulving Company Ships All Gold, Silver, Platinum, and Palladium UPS Overnight.
 Every order is shipped UPS Next Day Air for free.
 We e-mail you your Tracking Number the day your order ships.
 You can track your package/s here - [UPS Tracking](#)

Trades Welcome:
 We accept trades (of items we sell ONLY) on all items listed.
 All of our normal minimums apply.
 Trades can only be done between 6:00am and 6:00pm PST
 Monday through Friday.

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YouTube Videos

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Free Historical U S Coin Information

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PCGS Coins

[PCGS Coins For Sale](#)
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[American 1/10, 1/4, 1/2, 1 Oz Gold Silver Platinum Eagles](#)
[Platinum 1 Oz American Eagle](#)
[American Eagle \\$50 Gold 1 Oz Coin](#)
[Eagle Gold \\$25 Dollar American 1/2 Oz Coins](#)
[Proof 1 Oz American Eagle 50 Dollar](#)
[1/10 American Eagles \\$5 Gold Rolls](#)
[American Eagle Gold 10 Dollar 1/4 Oz Coins](#)
[1 Oz American Eagle Gold 50 Dollar Coin](#)
[Silver Eagle Proof Dollar Coins](#)
[Silver Platinum American Eagles Mintages](#)
[American Eagle Gold Coins](#)
[Proof Gold American Eagles U.S. Gold Coins](#)
[American Gold Coin American Eagle Gold Coin](#)
[2008 Platinum Eagle \\$100 American 1 Oz Platinum Coin](#)
[1/4 Ounce Platinum American Eagle Coins](#)
[1/2 Ounce Platinum Eagles](#)
[US Eagles 1/10 Ounce Platinum](#)
[Gold Eagles For Sale](#)
[Gold American Eagles For Sale](#)
[American Gold Eagles For Sale](#)
[Gold American Eagle Coins](#)
[Sell Silver Eagles Selling American Eagle Coins](#)
[U.S. Gold Eagle Coins](#)
[Gold U.S. Eagles For Sale](#)
[American Gold Eagle Coins For Sale](#)
[American Silver Eagles: A Guide to the U.S. Bullion Coin Program](#)

[1 Oz 10 Oz Kilo Gold Bars](#)
[Credit Suisse 1 Oz Gold 9999 Bar](#)
[Pamp Suisse Gold 24 Karat Bars](#)
[Johnson Matthey Gold Bars JM Bullion Bar](#)
[Pamp Suisse 10 Oz Gold Bars](#)
[Gold Bar Pamp Suisse 24kt 9999 Gold Bullion 10 Oz Bars](#)
[Gold Bars Scotiabank Gold Bars 9999 Gold 1 Oz Bars](#)
[Kilo Gold Bars Johnson Matthey Brand New JM Kilo Bar](#)
[Monex 10 Oz Gold Bar](#)
[1 Kilo Gold Bars 32.15 Oz Brand New Kilo JM Bars](#)
[Credit Suisse 10 Oz 9999 Gold Bar With Credit Suisse Certificate](#)
[Kilo Gold Bars Johnson Matthey JM Kilo Bar](#)
[Pamp Suisse 1 Kilo \(32.15 Oz\) 24 Kt 9999 Gold Bar](#)
[Credit Suisse Gold Bar 1 Troy Ounce](#)
[1 Oz Gold Bar 24k NTR Gold Triangle Bars](#)
[Royal Canadian Mint \(RCM\) Kilo Gold Bullion Bars](#)
[Perth Mint Gold Bars For Sale 10 Oz 9999 Bullion](#)
[Gold Bars Perth Mint Bullion 1 Oz 9999 Gold Bar](#)
[Purchase Gold Heraeus 1 Kilo 9999 Bars](#)
[JM 10 Oz 9999 Bars](#)
[Suisse UBS 1 Oz 9999 Bar](#)
[Pamp Suisse Gold 100 Gram \(3.215 Oz\) 9999 Bar](#)
[Gold Metalor 1 Oz Bars](#)
[NTR Metalor 1 Oz Gold](#)
[Gold Bullion For Sale](#)
[Canadian Gold Bars Royal Canadian Mint Gold Bullion](#)
[Sunshine Mini 1 Oz 9999 Gold Bar](#)
[NTR 1 Oz 9999 Gold Bar](#)
[Sunshine Mini Gold Bars](#)
[Metalor Gold Bars 1 Kilo Bullion](#)
[OPM 1 Oz Gold Bar](#)
[OPM 1 Kilo Gold Bars](#)

[Gold Bullion 1 Oz Coins And Bars](#)
[Australian Gold Kangaroo 1 Oz Nugget](#)
[Austrian Philharmonic 9999 Bullion 1 Oz Coins](#)
[2007 Canadian Maple Leaf 99999](#)
[American Buffalo 9999 24 Kt](#)
[Chinese Panda 1 Oz Gold Coins](#)
[South African Gold Kruggerand 1 Oz](#)
[South African Gold Kruggerand 1 Oz Coins](#)
[Gold Kruggerand Coins For Sale](#)
[Proof Gold Buffalo American 999 Gold Coins](#)
[Gold](#)
[Kruggerand Gold Bullion Kruggerand Gold Coin Prices](#)
[Panda Gold Coins Gold Panda Coin From China](#)
[Gold Buffalo Coins Buffalo Gold Proof Coin](#)
[Gold Panda Coins Chinese Gold Panda 1/2 Oz Coin](#)
[American Eagle Coins U.S. Gold Silver Eagles 1 Oz Coin](#)
[Gold American Buffalo Coins Date Of Our Choice](#)
[2009 South African 1 Oz Gold Kruggerand Coin](#)
[Proof American Buffalo 1 Oz 24 Kt Gold Coin](#)
[Engelhard Gold Bullion Prospector BU 1 Oz Rounds](#)
[Kruggerands For Sale](#)
[Kruggerands Gold For Sale](#)
[For Sale Gold Bullion](#)
[US Gold Coins For Sale](#)
[Engelhard Gold Bars For Sale](#)
[For Sale Gold Bullion Coins](#)
[Gold Bullion For Sale](#)
[Gold Bars For Sale](#)

Exhibit C



Better Business Bureau®

BBB serving San Diego, Orange and Imperial Counties

BBB BUSINESS REVIEW

THIS BUSINESS IS NOT BBB ACCREDITED

The Tulving Company Inc

Phone: (800) 995-1708

Fax: (949) 722-0296

[View Additional Phone Numbers](#)

PO Box 6200, Newport Beach, CA 92658

hannes@tulving.com

<http://www.tulving.com>

! The Tulving Company Inc is Believed to Be Out of Business !

No Rating

On a scale of A+ to F
Reason for Rating
[BBB Ratings System Overview](#)

BBB Business Reviews may not be reproduced for sales or promotional purposes

Description

This company offers the sale of silver and gold coins.

BBB Accreditation

This business is not BBB accredited.

Businesses are under no obligation to seek BBB accreditation, and some businesses are not accredited because they have not sought BBB accreditation.

To be accredited by BBB, a business must apply for accreditation and BBB must determine that the business meets BBB accreditation standards, which include a commitment to make a good faith effort to resolve any consumer complaints. BBB Accredited Businesses must pay a fee for accreditation review/monitoring and for support of BBB services to the public.

Reason for Rating

BBB rating is based on 16 factors. [Get the details about the factors considered.](#)

Based on BBB files, this business has a BBB Rating of No Rating. The reason is as follows:

This business has no rating because BBB has information indicating it is out of business.

Customer Complaints Summary

[Read complaint details](#)

323 complaints closed with BBB in last 3 years 323 closed in last 12 months	
Complaint Type	Total Closed Complaints
Advertising/Sales Issues	5
Billing/Collection Issues	4
Delivery Issues	298
Guarantee/Warranty Issues	0
Problems with Product/Service	16

Total Closed Complaints	323
-------------------------	-----

Additional Complaint Information

Consumer complaints are alleging delivery issues. Several consumer complaints allege they are promised delivery of ordered product, ranging between \$10,000-\$100,000, within 24 hours but after several months no delivery of product is ever received. Consumers also allege difficulty reaching the company in order to obtain a shipping date. The company has failed to respond to most consumer complaints by the BBB. The BBB attempted to contact the company regarding this pattern but the company did not respond.

Government Actions

BBB knows of no significant government actions involving The Tulving Company Inc.

What government actions does BBB report on?

Advertising Review

BBB has nothing to report concerning The Tulving Company Inc's advertising at this time.

What is BBB Advertising Review?

Additional Information

BBB file opened:

Business started: 10/25/1990 in CA

Business incorporated: 10/25/1990 in CA

Licensing

This business is in an industry that may require professional licensing, bonding or registration. BBB encourages you to check with the appropriate agency to be certain any requirements are currently being met.

These agencies may include:

State Board of Equalization

334 Via Vera Cruz #107, San Marcos CA 92069

http://www.boe.ca.gov

Phone Number: 760-510-5850

The license number is 040617711.

Type of Entity

Corporation

Contact Information

Principal: Hannes Tulving, Owner

Number of Employees

1

Business Category

Gold, Silver & Platinum Dealers

Gold Buyers

Coin Dealers, Supplies

Alternate Business Names

Hannes Tulving Rare Coin Investments

Tulving Company

Referral Assistance

The following Government Agency(s) or Association(s) may be able to provide you additional information:

Department of Business Oversight (DBO)

7575 Metropolitan Dr #108, San Diego CA 92108

Phone Number: (619) 682-7227

Fax Number: (619) 682-7217

http://www.dbo.ca.gov/

California Attorney General

PO Box 944255, Sacramento CA 94244-2550

Phone Number: (800) 952-5225

http://www.ag.ca.gov

Additional Information

Consumers with outstanding claims are encouraged to contact the Department of Business Oversight for further assistance.

California Department of Business Oversight
www.dbo.ca.gov
866-275-2677

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BBB serving San Diego, Orange and Imperial Counties

Exhibit D

All About Hannes Tulving, Jr., President of The Tulving Company And His Family Members That Currently Work At The Tulving Co.



Hannes Tulving, Jr.'s parents were immigrants who found and live the American Dream. Both mother and father came to the United States in 1949 from Estonia, a small country on the Baltic Sea, that had been taken over by Russia during World War II. They arrived in this country with no money, some clothes, and big dreams. In 1953, Hannes Sr. bought his first business, a Chevron service station. He would remain a Chevron dealer until he retired in 1985.

Hannes Jr. was born July 6th, 1955, and by age eight was already doing odd jobs around his father's service station. He worked on and off at the station through his teenage years, doing such things as working on cars, pumping gas, and doing the daily books. Hannes was the Prom King and also an avid basketball player, and in his senior year at Covina High School in Covina, California, earned All-CIF honors. He proceeded to go to Cal Poly San Luis Obispo, in California, on a basketball scholarship.

Hannes Tulving, Jr. became a full time coin dealer in 1976. He began by selling coins at a local swap meet, and then started to attend local coin conventions. Early in his career he was fortunate enough to meet John Wayne, "The Duke." He became

one of Mr. Tulving's largest customers, buying gold bullion from him.

In 1979, Mr. Tulving moved his operation down to Newport Beach, California, where it has been ever since. Mr. Tulving's professional accomplishments have been numerous over the years. In the 1982 edition of Wayne Miller's famous *The Morgan and Peace Dollar Textbook*, Mr. Tulving was listed as a major contributor to the book. Mr. Miller has called Hannes Tulving "the best dealer in the gem silver dollar business." In July, 1983, Hannes Tulving wrote an article for the *Coin Dealer Newsletter (Grey Sheet)*. The editor had this to say of Mr. Tulving, "Mr. Tulving is among the small group of the country's leading silver dollar specialists; the knowledge and experience that he has gained by a nearly exclusive concentration on dollars over a number of years enables him to view the overall market in a very discerning manner."

PCGS is now one of the the largest independent grading services, as well as one of the two most reputable services. In late 1985, they wanted Hannes Tulving involved. In a letter from David Hall, founder of PCGS, to Hannes, it said "We invite your participation... as a member of the grading board. We want to be able to say, "seven of the world's top grading experts" instead of "six". You... can grade coins for us any time you want."

In 1986, Les and Sue Fox wrote *Silver Dollar Fortune Telling*. In the book the authors state "Hannes Tulving, Jr. is one of the most noted and successful silver dollar investment experts in the United States."

For 30+ years in the rare coin business, he has never had a commissioned salesperson on staff, nor does he believe in cold calling people. The Tulving Company has no telemarketing operation, nor will we ever. In the past 30+ years, Hannes has bought and sold over 1.1 million individual coins.

Sensing that the Internet may be the place to be, Hannes set up www.tulving.com, our website, in November, 1995. We now do all of our business over the internet, using our website, and have done in excess of 2.1 Billion Dollars in business from January 1st, 1999 to March 30th, 2013. We also have done business with over 28,000 different customers in all.

On June 17, 2005, Hannes had a major stroke (brain stem) and was rushed to Hoag Hospital in Newport Beach via ambulance (where he spent about 14 days-about 7 in ICU and about 7 in the stroke unit). According to the doctors, it was NOT caused by high blood pressure or high cholesterol, or any other problem, it was just a freak occurrence that could have happened to anyone. As of today, July 3rd, 2011, he goes to the office every day, and has since early May 2006. Now, because of working during the week, he exercises every morning. On July 7th, 2007, he started to ride a bike. On weekends he does other exercises. He has done his weekend routine on every holiday and has not missed his weekday or weekend routine since he started to walk in August 2005. He has not completely, yet, recovered from the stroke, as he can not write well with his right hand (he is right handed) nor can he type a long letter (such as long E-Mails), but is expected to in the future. His e-mails are short because of the stroke. 45 pounds lighter than before the stroke, he eats healthy food every day. On September 4th, 2007, he started to practice driving a car on private property. On May 7th, 2009, he got a driver's license. His goal is a complete, full recovery. His current vital signs are: blood pressure is 115/75, his pulse is 45 and his cholesterol is 132. As of 3-30-13, he is working on his balance skills, as they might be the only area in which he has not fully recovered. To help on the balance, he takes a yoga class, pilates class, and balance class. He works out six days a week.

Do you have any questions? Please e-mail Hannes at hannes@tulving.com at any time.

He answers all his own e-mail. The Tulving Company has been with the same bank since 1990.

We are also unique in that We Are Open 24 Hours A Day / 7 Days A Week, Including Holidays, and as far as we know, no one else is.

If you would like to begin a mutually beneficial relationship with The Tulving Company, just call us toll-free (United States And Canada) at 800-995-1708. International, please call us at 949-722-0290. Sorry, but we only ship to the U.S. addresses, including U.S. depositories. Ask to speak with Hannes Tulving, Jr., President, The Tulving Company.

IMPORTANT NOTICE

FACTORS YOU MUST CONSIDER IN PURCHASING COINS AND BULLION ITEMS

RISK: The purchase of coins or bullion items are highly speculative and involves substantial risk. As in other markets, coin or bullion prices can be extremely volatile and will rise and fall depending upon market conditions.

Therefore, before purchasing coins or bullion, you should first have adequate cash reserves and other assets to absorb a potentially significant loss. Sorry, but we do not make recommendations, we think you should buy what you want.

HOLDING PERIOD: Historically, few coins or bullion items have appreciated dramatically in the short term. Therefore, purchasers should recognize that

it may well be necessary for them to hold coins for a 3 - 5 year period, or even a 5 - 10 year period, to have any chance of realizing a significant gain.

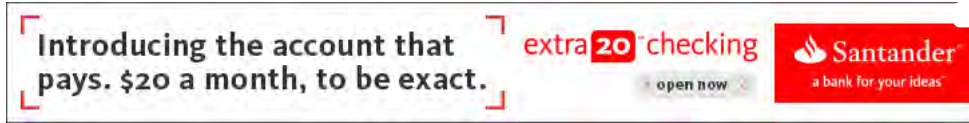
The Tulving Company (Since 1990)
P.O. Box 6200, Newport Beach, CA 92658
800-995-1708 (U.S. And Canada), FAX 949-722-0296
International, call 949-722-0290
E-Mail hannes@tulving.com

[Return to The Tulving Company Homepage](#)

[Gold, Platinum, Palladium & Silver Coins](#)

[2011 Gold Silver Platinum Eagle Rolls Bags Boxes PCGS Coins Site Map](#)

Exhibit E



Home Counterfeits U.S. Specific Forms of Silver Information Data Misc. SLV Glossary

About.Ag

All About Silver - ... the buck stops here ...

*** NOTE *** [THE TULVING COMPANY IS OUT OF BUSINESS](#)

Search Site:

The FCC requires delivery within 30 days (unless otherwise specified), or you can get your money back. California commodities law requires The Tulving Company to ship within 28 days.

Latest Status	
# Complaints (as of 02 Mar 2014)	502
Average Order:	\$43,250.19
Average Delay:	~13 weeks
Longest Delay:	Over 10 months
Est. verified Complaint Amount: (as of 03 Mar 2014)	\$21,711,595.92
Outstanding Orders:	~\$47.5M (or ~\$500M per Tulving claims)
Orders Taken Illegally:	~\$500,000,000
# Lawsuits :	At least 5

THIS PAGE IS OUTDATED: GO TO about.ag/Tulving.htm FOR UP-TO-DATE INFORMATION

This is the page that was being updated as the Tulving problem started becoming known. On Friday, February 28, 2014, we stated that they were effectively out of business, and about 8 business hours later, they had shut down.

For details after their shutdown, you can go to about.ag/Tulving.htm.

Tulving Phones No Longer Being Answered

March 3, 2014 2:25PM EST
 We have just received two reports that The Tulving Company is not answering their phones.

In the past, they have had a notice on their website if they would not be answering the phones (e.g. for a meeting), so it looks like this is the end.

March 3, 2014 - Understanding the \$47.5M Tulving Problem

I believe that The Tulving Company lost a lot of money over a period of time, most in April, 2013 (when the metals prices plummeted 20% in a matter of days), probably on COMEX. I calculate the loss to be [\\$47.5M](#).

If this is the case, he has nearly \$0 in the bank, and \$47.5M of outstanding orders. The only way to stay in business having lost so much money is to delay orders. If you have 1,000 outstanding orders, and 1 new order comes in, you can use the money from that new order to ship out one of the outstanding orders (instead of shipping the new order). The problem with this, of course, is that you still have 1,000 outstanding orders, and are in no better shape. That new order cannot be fulfilled until 1,000 new orders come in (at which point a different 1,000 orders will be outstanding).

Tulving was getting roughly \$30M/month in orders before this started, meaning that with [\\$47.5M lost](#), he would have to delay orders about 6 weeks. But, business declined as word got out about delays, so he is now doing much less business (probably around \$6M/month). At \$6M/month of incoming money, and a \$47.5M backlog of orders, it would take almost 8 months to deliver them (but without being able to deliver the new orders).

If anyone can come up with an explanation as to what is happening with The Tulving Company that does not involve them having lost roughly \$47.5M of customer money, please tell us!

March 2, 2014 - Why Tulving Is Ignoring the BBB/BCA

I finally figured out why Tulving is not responding to the BBB and BCA anymore.

Over the past few months, as he has approached the '[Tipping Point](#)' (see below; complaints now exceeding orders), he has had to push out promised ship dates farther and farther.

The problem is that recently his promised shipping dates have hit 28-29 days after the complaint was filed.

28 days is the number of days that a California bullion dealer has to ship, per California commodities law. And the FTC

The Tulving Company - Out of Business
requires shipment within 30 days (unless another time is given before the order).

So if Tulving responds to these complaints with a promised shipping date of, say, 35 days, then he is proving in what he writes that he is unable to fulfill even the most urgent of orders within the timeframe required by law.

So it sounds like Tulving had 3 choices: [1] Ignore the complaint, [2] Prove conclusively that he is violating the law, or [3] Lie (and later get caught lying).

~~Hannes, could you please do the right thing, and either file bankruptcy or if you are not insolvent come clean and explain the situation? If you need help doing so, I can try to help you.~~ Thank you, Hannes, for shutting down your operations and ending this.

February 28, 2014 - The End?

Addendum: Reports show that The Tulving Company is still 'in business', meaning that they are accepting money as of February 28. However, they are effectively out of business -- if they are collecting money, and stopped promising to deliver the metal, where does that leave them?

For the past week, the number of complaints reported by the BBB and BCA has gone down from about 35 per week to nearly zero.

Today, we have found out why: the BBB reported 12 complaints in the past 2 days that Tulving did not respond to!

Although the BBB has occasionally reported that Tulving has not responded to complaints, in the past it appeared to be due to the heavy volume of complaints (an average of 6 per day), and he just missed a few. But this is very different; it seems like he has just dropped the ball and is not responding to complaints anymore.

As far as we can tell, The Tulving Company is effectively out of business (and likely just tying up loose ends and/or filing for bankruptcy).

We have had reports that they are still accepting orders/money, so it sounds like they are still trying to make good on old orders, but of course can only do so by taking new orders.

Wanted: Invoice #'s

We are looking for invoice numbers from 2013 and 2014 (earlier would be nice as well for comparing). These will help us determine how much his sales are declining each month.

If you can send the invoice number(s) and date(s) to [\[E-mail\]](mailto:), it would be very helpful. Feel free to "X" out the last digit (e.g. '52100X' if the order number is 521008). Thank you very much!

Tipping Point

We have gotten a ton of data about The Tulving Company. With 450+ complaints, often describing exactly what was ordered and the cost, we can find out a lot.

In the first half of 2013, he was averaging about 30 orders per day. From July, 2013 through the end of November, 2013, he averaged just 10 orders per day! In December, that went down to about 8 orders per day. In January, it is around 5 orders per day.

The problem here is that complaints are going up (see the chart at the bottom of the page). He is now getting almost exactly the same number of complaints per day as he is orders.

As complaints exceed orders (which happens because he did much more business in the past), he has to push out delivery dates that he promises to the BBB/BCA farther and farther.

And as orders go down drastically, so does your profit and ability to pay fixed costs like employees, insurance, rent, etc.

So at this point it looks like the tipping point may have been hit.

Changes to Tulving Website

At some point recently (on or after January 13, 2014), Tulving changed their FAQ page and removed the following:

6) How Do You Ship Gold, Platinum And Palladium? Currently, We Ship All Of Them UPS Next Day Air Saver (Method, NOT time). We ship About 4-5 WORKING days after we get a wire from you.

7) Silver, you say, might take about 4-5 working days longer to ship after we get a wire longer than Gold. Yes, That Is Correct.

8) How long do "Trades" usually take? About 12 working days (3 Weeks).

9) How long do personal checks, cashiers checks, etc (NON Wires) take to process and ship? The entire procedure is ABOUT 35 days.

14) When the Tulving Co. is sold out of an item, the Tulving Co. does not sell it, unless it is within 30 days. Why is that? We, like most dealers, can not sell precious metals futures. Over 30 days, in our opinion, is selling a futures contract. We avoid that situation.

16) What Is Your Shipping Policy On Paid Orders? We ALWAYS Ship On A First Paid, First Shipped Basis. In Other Words, If You Pay Earlier Than Somebody Else, You Get It Before Someone Else. If We Get In Items Earlier Than Expected, The Item (s) Go To Those That Have Already Paid For An Item. Call Us If You Need Examples. 800 995-1708 24)

H. If You Buy Or Sell \$100,000 Or More And Live Locally, You Can Arrange A Meeting With Us In Costa Mesa, Ca. OR We Can P/U Or Deliver.

I. Would You Like To Pick Up Your Metal Order From Us? We Can Arrange That. Regardless Of Where You Live, You Can PU If You Order \$100,000 Or More. Payment By Wire Is Required When You Order And 2 Days In Advance Of Your PU. Call To Set Up

Apparently, he thinks that by not stating delivery times, he can bypass the FTC Mail Order Rule (not true; he would have to

state the actual delivery time, the default is 30 days if not specified), the California Commodity Law of 1990 (not true; it's always 28 days).

Tulving Kicked Out of Certified Coin Exchange (CCE)

The Certified Coin Exchange (CCE) is a network that bullion dealers use to trade metal. For example, if a local coin store buys 10 100oz silver bars, more than they want to keep in stock, they can use CCE to find someone (like Tulving) who would buy it from them.

Tulving used to put offers on there, and was one of his sources of metal. He apparently would usually pay a bit more than most other dealers, and likely obtained quite a bit of metal through there.

However, we have now heard from several coin dealers that The Tulving Company was kicked out of the CCE network. The most likely explanation for this would be that Tulving was buying product from dealers, and unable to pay right away ("I'll gladly pay you Tuesday for a hamburger today.").

This appears to have happened within the first week or so of January, 2014.

Missed BBB Promises

On January 31, 2014 we discovered 2 reports that The Tulving Company did not ship orders by the dates promised to the BBB. In other words, The Tulving Company delayed these orders for 3-5 months, and the customers complained to the BBB -- at which point, The Tulving Company promised to deliver them by a specific date, but failed to.

This is important because of the way that The Tulving Company has been handling complaints. They respond to the BBB or BCA with the date (in the future) that they will ship, rather than responding after they have shipped. As a result, we have to trust that they will ship when promised (funny, huh?).

However, their apparent inability to ship the product when promised to the BBB suggests that they may have surpassed the limit of what they can send out (in other words, money coming in from new orders is even less than expected).

*** On February 6, 2014 we confirmed that Hannes Tulving promised the BBB that an order would be shipped on January 10, 2014, that the customer alleged was not shipped. Mr. Tulving confirmed that it was not shipped, and promises that it will be shipped February 7, 2014. That is 4 weeks after originally promised to the BBB!

As of February 18, 2014, we have not discovered any more such issues, so it appears those may have been isolated issues.

Quick Note/ Disclaimer

This page has just received a lot of press starting January 27 (the page was first put online in October), including many sites providing a warning of how Tulving's reputation has changed.

To clarify: the about.ag website is designed to be a source of truth for silver (and gold) investors. We do not have any direct connections with any bullion dealers. I (the maintainer of this page) have done business with The Tulving Company in the past, had excellent results, and have recommended him to many people over the years. In other words, I'm close to an impartial observer.

It is my belief is that Mr. Tulving is trying to make good for his customers, but is simply unable to. I have just reached out to Mr. Tulving, and would be happy to work with him in finding the best solution for everyone involved.

Summary

Hannes Tulving, Jr., owner of The Tulving Company, currently has outstanding orders estimated at as much as \$300,000,000 (but in reality likely much lower). It appears that he currently is only able to ship out about \$1M of orders per week (every Friday), presumably using money from new orders. According to information from The Tulving Company, it appears that he has taken over \$500,000,000 of orders illegally (knowing they would not be delivered within 30 days, violating the FTC Mail Order Rule, CA law, and his FTC consent decree) since April, 2013.

The 400+ complaints we have tracked are all the same: people order, they call to check on the order, are given the run-around (they have an 'unusually high volume of orders', shipping limits, etc.), and never get their order. We have only heard of several people ordering from Tulving since April, 2013 who have received their order in less than 30 days.

We also have a list of the [400+ complaints here](#).

Where/ How to Complain:

First, open a complaint with either the BBB or BCA (see below). You've got a decent chance of getting your order within 2-3 weeks that way. Then, complain to the other organizations to help end this as quickly as possible.

BBB or BCA	[Now that The Tulving Company is shut down, it is unlikely these organizations can assist; however, the BCA says they are still accepting complaints] Your first stop is one of these two (BBB: click "File a Complaint against The Tulving Company Inc", BCA: click "File Complaint". So far, Hannes Tulving has been shipping out orders complained through BBB/BCA within 2-3 weeks.
IC3	IC3 (Internet Crime Complaint Center), run by the FBI and NW3C.
FTC	Click on "Internet Services, Online Shopping, or Computers", then "Online Shopping" then "I never received merchandise.". The FTC went after Hannes Tulving in the early 1990s and fined him.
CA Dept. of Business	These are the guys that go after bullion dealers that do not deliver within 28 days, which is illegal in California (Section 29520).

Oversight	
CA Attorney General	The California Attorney General may get involved if they receive enough complaints.
Orange County District Attorney	You need to sign and mail in the form.
CFTC	The Dodd-Frank Act authorizes the CFTC to investigate matters that involve bullion purchased not delivered within 28 days.
USPS	The FTC says that the USPS sometimes investigates issues like this. However, this would likely not apply if you ordered silver (which he usually ships UPS).
Newport Beach Police Department	Apparently refers people to Costa Mesa police department. You could go through your local police department, if desired.
Costa Mesa Police Department	Apparently refers people to the Orange County DA's office (see above).
Private Attorney	Some people have had luck with a private attorney. Before filing a lawsuit, however, be aware that by the time a lawsuit is finished, Tulving could be out of business with no assets. Filing a lawsuit would likely best be used as leverage for negotiation. You may have quicker action from the BBB/BCA.

Details of the Warning

For close to two decades, The Tulving Company has been well known for almost always offering the best prices on a fairly limited selection of items, with a high minimum order, and 'no-frills' being an understatement. We would always recommend them to people who could afford the minimums, and were looking for the best prices. They had an excellent reputation until recently.

In the past, he would normally ship very quickly (often the same day he received your money).

However, starting mid-April, 2013, there were serious (read: illegal) issues with delays. Complaints to the BBB increased, and it looked like there could have been a problem.

Now, things are at the point where we feel that an alert needs to be issued. There are ~~dozens of~~ 400+ confirmed complaints of people waiting ~~several~~ up to 6+ months for \$10,000 to \$300,000+ orders.

We do not recommend using the Tulving Company for the time being. When we first wrote this page (October, 2013), we had "for the time being" there. Unfortunately, as of this update (January 24, 2014), we cannot in good faith keep "for the time being" there. We now sadly must recommend not using The Tulving Company anymore, even if there is a miracle and there are no future issues. If you do, you can expect a 5+ month delay.

Hannes Tulving, Jr. (and his customer service rep, Karen Brooks) has told people that his insurance policy limits the amount of metal he can send per day. However, some people have expressed concern that this may have turned into a \$300,000,000-or-so Ponzi-like scheme (where money received from customers today pays for orders placed months ago). If the insurance limit is true, he has more business than he can handle, and he needs less business -- so waiting to do business with him should help the situation. However, given what must be plummeting sales, the insurance expansion no longer is plausible (otherwise, we would see the delay going down).

In the past, the Tulving Company had an impeccable track record of the best no-frills prices and fast shipping. Unfortunately, that has changed, and all signs make it look like he is facing bankruptcy.

Verification

Hannes Tulving, Jr., himself, has verified an estimated 400+ complaints of delivery delays, averaging about 13 weeks and \$42,000 each. All were for delays that appear to violate the FTC Mail Order Rule.

At the beginning, the reports were near-anonymous complaints in forums, that could not easily be verified. However, Mr. Tulving has made part the verification simple by himself verifying the majority of the complaints.

Violating Their Own Policies

The Tulving Company states "We ALWAYS Ship On A First Paid, First Shipped Basis. In Other Words, If You Pay Earlier Than Somebody Else, You Always Get It Before Someone Else." However, many people have reported being told that a decision is made each day about which orders ship, and it is clear that those that complain to the BBB get their orders shipped more quickly.

The Tulving Company states "We ship About 4-5 WORKING days after we get a wire from you." (4-5 working days longer for silver) [FAQ page, 14 Oct 2013]. However, many people have reported multi-month delays.

The Tulving Company states "We, like most dealers, can not sell precious metals futures. Over 30 days, in our opinion, is selling a futures contract. We avoid that situation." However, there are many reports of people not receiving their metal for several months.

The Tulving Company claims "All Items In Stock." However, this is quite obviously a blatant lie. Not only is it well known that he drop-ships many (or possibly now all) items, the facts make it clear he does not have a \$300M inventory of bullion.

Laws Violated

FTC Mail Order Rule - Shipping Time

The U.S. Federal Trade Commission has a 'Mail Order Rule', which essentially says that orders shipped by mail must be

sent within 30 days (unless a longer time is made clear to the customer). If not, the company is required to let the customer know, and give them the option of a full refund.

He is on record as having violated this law on at least 400 occasions.

FTC Mail Order Rule - Refunds

The FTC Mail Order Rule requires businesses to offer customers a "full and prompt refund" if they cannot meet the original shipment date.

There are many cases on record where customers have requested a refund, but told flat-out that The Tulving Company does not allow refunds.

California Commodity Law of 1990 (CA § 29520)

The California Commodity Law requires bullion dealers to deliver within 28 calendar days. There are approximately 400 reports of The Tulving Company violating this law.

Hannes Tulving's FTC Consent Decree

In 1992, Hannes Tulving signed a consent decree with the FTC, which prohibits him from "misrepresenting the degree of risk or any other fact material to a consumer's decision to purchase any investment offering". Nobody would order if they knew of a 6 month delay, so that is obviously a material fact, and violates the FTC consent decree. If he is on the brink of bankruptcy, as many believe, it would also violate the "degree of risk" portion of the consent decree.

Size of the Problem

Tulving has claimed sales of \$650M in 2011. According to Hannes Tulving, "We ALWAYS Ship On A First Paid, First Shipped Basis." Given that a report on January 14 involved an order placed on June 28, 2013, that means that the current backlog would be about 6.5 months. That would be about \$350,000,000 of orders that he owes customers, that have not shipped yet.

Since the problem started approximately April 12, 2013, as of January 12, 2014, that would be nearly \$500M of orders that he took illegally (e.g. knowing that they could not be delivered within 28-30 days).

In reality, we do not believe that the actual numbers are that high. We believe his business was less than \$650M/year when this started (although there is a report of him claiming in June 2013 of having "record sales"), and we know that orders are not first paid, first shipped.

There may be as many as 10,000 people waiting for their orders (although likely less), that have not received them yet.

Our estimate is that at least 90% of all orders (and quite possibly closer to 99%) are delayed at least 30 days (violating the laws mentioned above).

Is Tulving a Con Artist?

No.

It appears that in the late 1980s he had an extravagant lifestyle, and went bankrupt with an FTC consent decree. However, it is clear that he changed completely. He started tulving.com in 1995, and built up an excellent reputation. For over 15 years, he built up trust and earned a reputation for having the best prices and shipping quickly. Nobody warned against doing business with him. Very, very few people had any complaints (the typical ones being from people who could not afford the minimum orders, and Mr. Tulving being 'gruff').

Certainly, things have changed completely over the past year or two -- and it is clear that he is operating illegally, by taking orders he knows he cannot ship within 28-30 days.

However, from what we have seen, he always confirms wire transfers after receiving them. He almost always ships out orders on the date promised to the BBB/BCA. From what we can tell, when he has the money in the bank to fulfill orders, he always does.

It is clear that he has no intent on skipping town with money from customer orders, is not leading an extravagant lifestyle (how can you, if you take orders at 2AM?). There is simply a problem preventing him from getting orders out in a timely fashion (that we believe is due to a large amount of lost money, likely due to hedging gone wrong).

At this point, we would strongly warn against doing business with him, we also feel we should go on the record that we feel that the delays are due to problems that are now beyond his control.

Sample Complaints

There are anonymous complaints on many message boards (see goldismoney2.com - 'past the 3 months late mark.', golddealerreviews.com (customer of 7 years waiting 2-3 months for delivery, 3 month wait, etc.), bullionstacker.com (sent 220oz of gold, no payment in over 3 weeks).

The [BBB](http://BBB.org) (and here) has over 200 complaints, with the [Business Consumer Alliance](http://BusinessConsumerAlliance.com) showing over 150 complaints.

When we first wrote this, the most recent 5 complaints from BCA were typical:

- Paid May 14, 2013 for 40 1oz gold Eagles, 126 days have elapsed without receiving. Tulving's response: They will ship by Wednesday.
- Ordered \$11,670 of American Eagle Silver Coins on July 30, 2013, over 2 months without receiving. Tulving's response: They shipped the day they responded.
- \$13,090 of American Silver Eagles, 'same as all the rest of the complaints' (no details on date ordered, etc.). Tulving's response: They shipped the day they responded.
- \$27,025 of American Silver Eagles. Promised delivery in 8-10 business days. Wire sent 9/4, not received as of 9/27 (17 business days). Tulving's response: They will ship by 10/7.
- \$206,330 of in-stock Canadian Wildlife silver bullion coins. Wired money April 12, as of September 23 not received (5 months later). Ended up settling with Tulving by 'selling back' the coins at a \$30,000 loss to the customer!

Complaint Volume:

As of 07 Feb 2014, we have tracked 401 complaints in 2013-2014:

Month	# Complaints	# Complaint
January, 2013		
February, 2013	**	2
March, 2013		
April, 2013		
May, 2013		
June, 2013	*****	5
July, 2013	*****	6
August, 2013	*****	17
September, 2013	*****	22
October, 2013	*****	57
November, 2013	*****	64
December, 2013	*****	73
January, 2014	*****	125
February, 2014 (estimated)	*****	155 (101 in 18 days)

NOTES: 'Days to BCA delivery' is the time from a complaint until the promised delivery date (usually via the BCA). This is important, as it shows how backed up Tulving truly is.

The average delay is based on how long it takes from the time payment cleared until the complaint was lodged or the product was delivered (if known). In some cases, estimates were used (e.g. is a '3 month delay' 12, 13, 14 weeks?). A few complaints may be duplicates (e.g. when someone complains to BBB and BCA).

Remember, the average delay is skewed, as it is based on when customers complain publicly, which is earlier than when they received the product. So the average 12-13 week delay seen in recent month likely means that most people that will complain publicly will do so around that time period.

Old Status Updates

[First posted: ~October 11, 2013]

[16 Jan 2014 **Update**: We are now at 303 complaints logged, for an estimated \$13.8M of orders!]

[06 Jan 2014 **Update**: BBB changed this around; the old page did not show new complaints. They now give Tulving a D- (changed from no rating), and have the text of some complaints online (partially censored). We are now at 257 complaints logged, for an estimated \$11M of orders!]

[11 Dec 2013 **Update**: The Tulving Company has expanded their order hours (4 more hours per day). November complaints up slightly over October. No patterns detected worthy of mentioning, although December complaints appear to be down a bit. BBB may be censoring (not showing all complaints). Hannes Tulving seems to now be responding to complaints once a week.]

[13 Nov 2013 **Update**: For the first half(ish) of November, the number of complaints has gone down about 25%, suggesting that the end is near -- either Tulving is back on track slowly heading towards normal shipping, or 'the jig is up'.]

[As of 01 Nov 2013, we have tracked 111 complaints of delivery delays this year, averaging about \$70,000 per order, for an estimated \$7,566,612.00 of orders delayed about 3-5 months:]

PROTECTED BY COPYSCAPE DO NOT COPY

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Exhibit F

Tulving Company Wiring Instructions

Bank And Wiring Instructions

[Click Here For Printer
Friendly Wiring Instructions](#)

Our Bank:

California Bank &
Trust
(Formerly Grossmont
Bank)
978 San Marcos Blvd.
San Marcos, CA
92069

[Click Here
For Printer
Friendly
Wiring
Instructions](#)

**Important: Make Sure
Your Name Is On The
Wire**

Wiring Instructions:

The Tulving
Company
Physical Address For
Wires ONLY
(No Shipping Or
Sending ANY Mail),
2100 W. Oceanfront
Blvd., Newport
Beach, CA 92663
Acct. # Call 800 995-
1708 Or (949) 722-
0290 For Account #
Or E-Mail Us At
hannes@tulving.com
For Info.
ABA # (Also Known
As The Routing
Number)
For California Bank
& Trust
1222 32109

For International
Wire Transfers Our
Swift # is CALBUS66

We Have Been With The Same Bank Since 1990.

All Payments Are Due Within 48 Working Hours For U.S. Customers
(Excluding Weekends And Holidays).

It Is Fine To Order On Fridays And WEEKENDS And Wire On Monday.

The Tulving Company- U.S And International Bullion Sales, P.O. Box 6200, Newport
Beach, Ca 92658

Our Phone Number Is 800 995-1708 Or 949-722-0290

References

We run online auctions with the following organizations:

- eBay - check our "Feedback" profile, our user ID on eBay is 35harbor (Our eBay store is PCGS Coins Only), as we ONLY Sell PCGS Graded Coins.

We are an advertiser in good standing with the following numismatic publications:

- Numismatic News
- Coin Prices Magazine
- Coins Magazine
- Coin Dealer Newsletter (Greysheet)

2009 We Sold 285 Million +

2010 We Sold \$370 Million +

2011 We Sold \$675 Million +

2012 We Sold \$350 Million +

[Return to The Tulving Company Homepage](#)

[2012 Gold Silver Platinum Eagle Rolls Bags Boxes PCGS Coins Site Map](#)

[Gold, Platinum, Palladium & Silver Coins](#)

Exhibit G

INTERNET ARCHIVE
WayBackMachine

http://tulving.com/New%20Pages/free_overnight_shipping.htm Go

57 captures
19 Nov 07 - 8 Feb 14

JUL NOV FEE
27
2012 2013 201

Are You Tired Of Waiting Weeks Months For Your Bullion From Other Dealers? We Offer Free Overnight Shipping Within 48 Working Hours Of Receipt Of A Wire!

Shipping Times And Methods (Approximate Times, NOT Exact)

Shipping Times

Gold and silver are shipped Free UPS Overnight and invoiced separately on a first paid / first shipped basis

Orders paid by wire:

Gold, Platinum, and Palladium are typically shipped within 72 working hours of receipt of your wire (NOT Including Friday).

Silver is typically shipped within about 5 working days after receipt of your wire. We do NOT include an invoice in the package, but will e mail the invoice to you (starting 8-30-10).

NO Items Are shipped on Friday (and is not considered a work day by us), as UPS is closed over the weekend and does not deliver on weekends.

Trades Are Processed about 8-10 Working Days After Receipt.

Wires received after 12:00 noon PST will be posted as received the following business day.

Orders paid by check:

We hold all orders paid by check (personal or cashiers) for about 14 working days after the check is received (For security reasons, we typically do not ship on Fridays nor consider them as working days, so it takes about 4 weeks total).

Shipping Methods (NOT Time)

The Tulving Company ships free UPS overnight shipping on all orders within the continental U.S.

All items we sell are shipped UPS Overnight Next Day Air Saver.

We offer free Overnight Shipping on all orders.

Shipping Times

Gold and silver are shipped and invoiced separately on a first paid / first shipped basis

Orders paid by wire:

Gold, Platinum, and Palladium are typically shipped within 72 working hours of receipt of your wire (NOT Including Friday).

Silver is typically shipped within about 5 working days after receipt of your wire. We do NOT include an invoice in the package, but will e mail the invoice to you (starting 8-30-10).

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Shipping Methods

The Tulving Company ships free overnight shipping on all orders within the continental U.S.

All items we sell are shipped UPS Overnight Next Day Air Saver.

Many people have noticed that our prices are consistently lower than any of our competitors.

Many times substantially lower. How is this possible?

Simple, less overhead and expenses.

- 1) We don't accept credit cards. If we did, we would have to pay a 3% fee to the credit card company, and hire someone to process the transactions, adding to our overhead.
- 2) We don't send out expensive brochures and mailings, saving us lots of postage and printing costs.
- 3) We don't have salespeople. We don't have to pay their salary (or commissions)
- 4) We don't run expensive TV or radio ads, so we have very little production and advertising costs.
- 5) We are a strictly mail order company. No retail shop or location. We save almost \$100,000 per year in insurance as we do not meet with clients at our office.
- 6) We also don't have to hire receptionists, secretaries and other administrative personnel for the office.
- 7) We do not need to go to coin conventions to sell our coins, saving us travel expense, food,

lodging , booth fees, etc. This is a huge savings to us every year.

8) Most coin firms have a professional coin buyer that they pay to buy coins for the company. A coin buyer makes lots of money.

The President and sole owner of The Tulving Company, Inc., Hannes Tulving, Jr., is an industry recognized rare coin expert.

He personally inspects and buys every coin for The Tulving Company. He does not have to pay someone else a lot of money to buy coins for him.

When you buy coins from our competitors, you are paying for those costs listed above on every item. The Tulving Company does not have those costs, so we pass the savings on to you.

Contact Hannes Tulving, Jr., President and owner of The Tulving Company.

He personally buys every coin we have listed for sale.

You can deal directly with an acknowledged rare coin expert with over 30 years experience as a full time coin dealer who has bought and sold millions of coins worth hundreds of millions of dollars.

Call him at 800-995-1708 or E-mail him at hannes@tulving.com.

Join the over 15,000 satisfied Tulving Company customers from throughout the United States that have purchased Gold, Silver, Platinum, and Palladium bullion at great prices.

IMPORTANT NOTICE

FACTORS YOU MUST CONSIDER IN PURCHASING COINS AND BULLION ITEMS

RISK: The purchase of coins or bullion items are highly speculative and involves substantial risk. As in other markets, coin or bullion prices can be extremely volatile and will rise and fall depending upon market conditions.

Therefore, before purchasing coins or bullion, you should first have adequate cash reserves and other assets to absorb a potentially significant loss. Sorry, but we do not make recommendations, we think you should buy what you want.

HOLDING PERIOD: Historically, few coins or bullion items have appreciated dramatically in the short term. Therefore, purchasers should recognize that

it may well be necessary for them to hold coins for a 3 - 5 year period, or even a 5 - 10 year period, to have any chance of realizing a significant gain.

The Tulving Company (Since 1990)

P.O. Box 6200, Newport Beach, CA 92658

800-995-1708, FAX 714-545-3031

If You Are in Alaska or Hawaii, call 714-545-3030

E-Mail hannes@tulving.com

[Gold Silver Eagles Us Worldwide Bullion Dealer American Coins Bars](#)

[Gold Silver Eagles Us Worldwide Bullion Dealer American Coins Bars](#)

[American Eagle Gold Silver Platinum Bullion 2009 Site Map](#)

Exhibit H

About.Ag

All About Silver - ... the buck stops here ...

*** NOTE *** [THE TULVING COMPANY IS OUT OF BUSINESS](#)

Search Site:

Tulving Delivery Complaints

Spreadsheet of complaints of long deliveries from The Tulving Company

Date Posted is from BBB/BCA. Delta is days from complaint to shipping of metal.

Apologies for the messy format! See <http://about.ag/tulving.htm> for outline of problems.

Report Date	Date Posted	Date Shipped/Promised	Delta	Amount	Item(s)	Notes1	Payment/order date	Notes2	URL
01/27/14	01/21/14	02/07/14	17	\$123,500.00	100 AGE	6 weeks	12/27 sent gold		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=BGwrrkATzC6kEDl94NlPw==
01/27/14	01/21/14	02/07/14	17	\$15,043.60	\$1000 90% silver	9 weeks	12/12 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=nIZxV3YK2oMX9stbK1L+SQ==
01/27/14	01/21/14	02/07/14	17	\$14,170.00	10 1oz Platinum coins	9 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=KQ6eybs/4FkYKn05T5Y5g==
01/27/14	01/21/14	02/07/14	17	\$20,280.00	10 100oz silver bars	9 weeks	12/12 order	Sending check for refund Feb 7.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=jAZsBMQQGH9hBNEfPAO6w==
01/27/14	01/21/14	02/07/14	17	\$11,610.00	500 ASE	11 weeks	11/25 paid		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=AD+sM92t03tUac0GonBcnA==
01/27/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/27/14						Delivery Issues (Failed to Resolve)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/24/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

									13090180/complaints#
01/23/14	01/23/14	01/28/14	5	\$48,113.55	Gold and silver	10 weeks	11/20 wire transfer	Told he would receive a check for \$46,960.20, selling back at a loss.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=QnF1p+M9PH7tB3dU3UWEoQ==
01/23/14	01/17/14	01/31/14	14	\$26,765.00		12 weeks	11/8 wire	Said that Karen said 'she's getting calls like this all day long and there's nothing she can do as the owner is not giving her clear information.'	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=5le93RjiLUrV7BSMn0cNwA==
01/23/14	01/17/14	01/31/14	14	\$39,949.00	Gold and silver	11 weeks	11/20 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=SmrASqWWbtF0/B7hqosWdA==
01/23/14	01/17/14	01/31/14	14	\$123,745.00	100 AGE	7 weeks	12/19 order	Sold back for \$126770 (profit) on 1/10/14, but Tulving is sending gold, not a check!	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Sx4rVBWAs4H84arkeWbZ1w==
01/23/14	01/16/14	01/31/14	15	\$78,645.00	3500 CML	29 weeks	7/17 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=stSye432PpdEaceS7R0L/w==
01/23/14	01/15/14	01/31/14	16	\$11,425.00	500 CML	12 weeks	11/13 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=iOmNRr0ktYYRr33peKWnYQ==
01/23/14	01/15/14	01/31/14	16	\$78,690.00	3000 ASE	22 weeks	9/4 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=SMQg4w4YcxY+Zf7A8B/ttg==
01/23/14	01/15/14	01/31/14	16	\$25,862.00	20 1-oz gold coins	11 weeks	11/21 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=1MD+eZ7NyAezx/GSptAuRw==
01/23/14	01/14/14	01/31/14	17	\$21,980.00	1000 CML	26 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=S6H0nlOPHQn4D3qmOsXUsg==
01/23/14	12/27/13	01/24/14	28	\$26,395.00	20 CGM	28 weeks	7/15 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=dQjK7Yy6DggepQqK14WwhQ==
01/23/14		01/21/14				7 weeks	12/9 order	Was told by KB that the wait for a check could	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-

								check could be as long as for product.	13090180/complaints#
01/23/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/23/14		01/23/14		\$26,525.00	20 CGM	14 weeks	10/18 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/23/14		01/31/14				12 weeks	11/14 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/22/14		01/31/14		\$27,535.00	20 1-oz gold coins	17 weeks	10/8 wire transfer		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/22/14						Delivery Issues (Good Faith)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/22/14						Delivery Issues (Good Faith)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/21/14				\$16,116.10	\$1000 90% silver		12/19 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/21/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/21/14	12/09/13	01/17/14	39	\$12,960.00	500ASE	23 weeks	8/20 order		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/17/14	01/17/14	01/17/14	0	\$16,116.00	\$1000FV 90% silver				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=1f0bIZ8lx+k/oo/32zRxx==
01/17/14	01/13/14	01/24/14	11	\$11,105.00	500 CML	10 weeks	11/19 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=MgnuzRWMOZr0+IDnaR4I4g==
01/17/14	01/13/14	01/24/14	11	\$10,230.00	50 10oz silver bars	9 weeks	11/25 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=4jnO8BSvYB8rmtSo2xeu6w==
01/17/14	01/13/14			\$75,000.00					http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=6bofitVPbIYrD3ovYag/OA==
01/17/14	01/13/14			\$36,555.00	1500CML	13 weeks	10/21 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=+J/4qKe+vW4SjrPtGRQ3mQ==
01/17/14	01/13/14	01/24/14	11	\$27,611.00	20 1-oz gold coins	20 weeks	9/12 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=0vb0kHwaqB4/jlpRA+BwTA==
									http://www.businessconsumeralliance.org/FullComplaint.aspx?

01/17/14	01/10/14	01/24/14	14	\$10,575.00	500 CML	8 weeks	12/4 wire		ID=vL98CDmemJQVUQLmkxbX1A==
01/17/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/17/14						Delivery Issues (Failed to Resolve)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/17/14						Delivery Issues (Good Faith)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/16/14		01/24/14				27 weeks	7/17 order		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/16/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/15/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/15/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/15/14						Billing/Collection issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/14/14	01/08/14	01/24/14	16	\$12,670.00	500 ASE	13 weeks	10/28 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/14/14	01/08/14	01/24/14	16	\$140,451.00	Gold+Silver				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/14/14	01/08/14	01/24/14	16	\$93,000.00		20 weeks	9/9 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/14/14	01/06/14	01/24/14	18	\$11,360.00	500 ASE	30 weeks	6/28 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/14/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/14/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/14/14		01/10/14				8 weeks	11/19 check sent		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

Order Date	Order Date	Order Date	Order Date	Amount	Item Description	Duration	Order Date	Order Type	Complaint URL
01/13/14		01/09/14		\$60,548.00			11/12 order		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/13/14					40oz gold		11/7 order		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/13/14				\$1,160.00			11/21 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/10/14		01/10/14		\$75,853.00	55 CML	25 weeks	7/23 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/10/14	01/06/14	01/17/14	11	\$11,825.00					http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	01/06/14	01/17/14	11	\$26,312.00	20 CML				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	01/02/14	01/17/14	15	\$53,000.00		19 weeks	9/11 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	01/02/14	01/17/14	15	\$64,280.00	49 AGE	12 weeks	10/29 trade	Trade	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/31/13	01/17/14	17	\$26,671.00	20 1-oz gold bars	25 weeks	7/31 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/30/13	01/17/14	18	\$25,215.00	20 AGE	7 weeks	12/2 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/30/13	01/17/14	18	\$134,730.00	100 CML	13 weeks	10/18 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/27/13	01/17/14	21	\$75,853.25	55 CML	25 weeks	7/23 wire	DUPLICATE _ REMOVE	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/27/13	01/17/14	21	\$25,860.00	1000 ASE				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/10/14	12/30/13	01/17/14	18	\$27,415.00	20 1-oz gold coins	15 weeks	10/8 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/09/14	12/30/13	01/09/14	10	\$25,751.00	20 AGE	7 weeks	11/27 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/09/14	12/31/13	01/17/14	17	\$27,599.00	20 CML	12 weeks	10/30 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/09/14	12/30/13	01/17/14	18	\$15,272.40	\$1000 90% silver	9 weeks	11/20 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
								Apparently Hannes told BBB he would ship	

Silver Data									
01/09/14				\$10,385.00	500oz silver	Delivery Issues (Good Faith)	8/7 wire	12/27, but on 12/26 complainer was told order would not ship that day or the next.	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/09/14		12/27/14		\$53,000.00			8 weeks	11/6 order	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14	12/26/13	01/17/14	22	\$12,384.00	5 100oz RCM silver bars			12/15 wire	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YhnBkRXqWaHBJYs/28leaQ==
01/08/14									http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14					silver			8/30 paid	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14						Delivery Issues			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14					500 CML		21 weeks	8/23 wire	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14				\$11,500.00	500oz silver		13 weeks	10/22 order	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14					500ASE+5001oz		11 weeks	11/5 wire	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14					20 CML			10/11 order	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14							13 weeks	10/9 order	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

01/08/14		01/17/14			20 1-oz gold bars	25 weeks	7/31 order		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/08/14							11/21 wire		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/07/14						Delivery Issues (Good Faith)			http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/06/14	12/23/13	01/10/14	18	\$26,983.00	20 AGE	30 weeks	6/20 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=X+3E6IPzX3mc9pEXg9ytrg==
01/06/14	12/23/13	01/10/14	18	\$24,675.00	1000 ASE	17 weeks	9/17 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=owh2kmltbGa0f0LAvqzWVA==
01/06/14		01/10/14		\$96,055.00		11 weeks	10/29 wire	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/06/14				\$52,182.00	40 AGE	Delivery Issues	7/10 wire	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/02/14	12/23/13	01/10/14	18	\$10,385.00	500 1oz silver coins	19 weeks	11/5 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=7UuiJGnt2Q3iawUigaFtfw==
01/02/14	12/23/13	01/10/14	18	\$25,300.00	1000 ASE	17 weeks	9/18 wire	Reports that Karen is not allowed to talk to Mr. Tulving	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Tsww70yQy8WSIWyHyXspaA==
01/02/14	12/20/13	01/10/14	21	\$23,500.00	1000 ASE	10 weeks	11/5 wire	Reports that Karen stated that the order was due to be shipped a few weeks earlier	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=mRgD+fk/nR+e+4WaaT8rQ==
01/02/14	12/20/13	01/10/14	21	\$10,795.00	500 1oz silver coins	8 weeks	11/15 wire		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=/okdUzs03dulFoP5J/14A==
01/02/14		01/03/14		\$28,089.00	20 AGE	10 weeks	10/25 wire	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/02/14						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/02/14						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

01/02/14						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/02/14						Problems with Product/Service			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
01/02/14						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/30/13	12/19/13	01/10/14	22	\$22,168.59	\$1500 90% silver	6 weeks	12/3 wire			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=/ulwHOFXKl8/nekp8UeQTg==
12/30/13	12/19/13	01/10/14	22	\$12,555.00	500ASE	16 weeks	9/23 order			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=x6j07wrPRW4PZ8YPPUz5g==
12/30/13	12/19/13	01/10/14	22	\$33,648.75		10 weeks	11/4 wire			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=rhyjRoXDzIN3mwnZtRvYw==
12/30/13	12/19/13	01/10/14	22	\$10,855.00	5 100oz silver bars					http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=mPxDI/smhJB/XgMv9YdSIQ==
12/30/13	12/19/13	01/10/14	22	\$12,360.00	500ASE	17 weeks	9/13 order	Also Christmas gifts, undelivered for the holidays.		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=TH20Qug3nLdLD6pEbw5wkw==
12/30/13	12/19/13	01/10/14	22	\$34,100.00	1500ASE	29 weeks	6/21 paid			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=8JKO2ub2UiNT02ueJ0I9qA==
12/30/13	12/19/13	01/10/14	22	\$21,260.00	1000 1Oz silver coins	26 weeks	7/15 wire			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=FQEdm8YRuDj3SM4UgtDNaw==
12/30/13	12/19/13	01/10/14	22	\$28,074.00	20AGE	11 weeks	10/25 wire			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=5zR+a9EXjjDz1Fc7wjAApA==
12/30/13	12/19/13	01/10/14	22	\$32,581.25	25AGE	8 weeks	11/20 paid	Were Christmas presents, that won't be delivered in time.		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=2x7cjX9IK7U8R/LXtaWJHA==
12/30/13	12/19/13	01/10/14	22	\$13,767.00	10 \$20 St Gaudens	25 weeks	7/22 check sent			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=XLttJP3yAJ6ldYS+eLYpSQ==
12/27/13	12/12/13	01/03/14	22	\$16,384.50	50 gold coins	10 weeks	10/25 wire			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YCz2zVALUEiyVuD9ASB9GA==
12/24/13	12/17/13	01/03/14	17	\$12,155.00	500 1oz silver coins	21 weeks	8/15 order			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=7a8Q/bfOa8Hz7+EYWY16zw==
									RRR - No	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-

12/24/13				\$52,182.00	40 AGE		7/10 wire	BBB - No Reponse!	supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/23/13	12/12/13	01/03/14	22	\$14,640.00	10 1oz Platinum coins	14 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=4F2fVcP SRLHoZ9hMLsooNw==
12/23/13	12/11/13	01/03/14	23	\$27,557.00	20AGE	21 weeks	8/13 paid		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=NDHsnSyWUSgSz/afXWIBNg==
12/23/13	12/11/13	01/03/14	23	\$12,580.00	500ASE	11 weeks	10/22 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=E2zpe2wUt666p/gYqMgVvg==
12/20/13	12/11/13	01/03/14	23	\$25,045.00	20CML	4 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=kKO1UIx4Z+FAmg6pdoELhQ==
12/19/13				\$11,270.00	500ASE	25 weeks	6/26 order	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/19/13				\$53,027.00	40 1-oz gold coins	9 weeks	10/15 wire transfer	Sold back.	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/19/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/18/13	12/13/13	01/03/14	21	\$26,385.00	20AGE	5 weeks	11/19 order	Apparently paid by check, so took off 2 weeks from time to deliver.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=v6EWt90Oan8T2lbw8nlH4Q==
12/18/13	12/12/13	01/03/14	22	\$11,255.00	500 1oz silver coins	14 weeks	10/1 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=oskdyRyqocUdVM/1OZEMQw==
12/18/13	12/11/13	01/03/14	23	\$38,455.00	20Oz gold + 500Oz silver	13 weeks	10/10 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=pVUsbAKoMfZadQOGJK3Jgw==
12/18/13	12/09/13	01/03/14	25	\$214,723.00	Gold+Silver	7 weeks	11/20 wire transfer	Four orders, unknown why (consecutive order #'s)	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=A/1evkCshlpqLKFgau51ow==
12/18/13	12/09/13	01/03/14	25	\$24,000.00	1000ASE	13 weeks	10/9 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=nHTxuNddLOaedacQWr6ocg==
12/18/13	12/06/13					8 weeks	10/20 order	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/18/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

12/17/13	12/12/13	12/23/13	11	\$25,311.00	20 AGE	3 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Wo82ZptuyUxuerjXyxpEVQ==
12/17/13	12/10/13	01/03/14	24	\$54,302.00	40 AGE	9 weeks	11/6 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=ln4hlaiHZkK7ucIKAKgVnw==
12/17/13				\$27,324.00	20 AGE		10/11 order	Sold back.	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/13/13	12/10/13	12/20/13	10	\$315,850.00	250AGE	4 weeks	11/22 gold recd by Tulving		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=5M3hlyzovJCTO7rcn+tCxA==
12/13/13		12/13/13				11 weeks	9/30 order	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/13/13				\$12,610.00	500 ASE	9 weeks	10/25 wire	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/13/13				\$50,231.70		9 weeks	10/9 check recd	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/12/13	12/05/13	12/12/13	7	\$20,800.00	100 10oz silver bars	19 weeks	8/5 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=KY9ht639pftB8bCGn8RvA==
12/12/13	12/04/13	12/20/13	16	\$49,344.00	1000CML+20CGM	10 weeks	10/11 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=NudUoUhWUGB55bvxbMZFBQ==
12/12/13	11/18/14	11/30/14	12		100 10oz silver bars	15 weeks	8/16 paid	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/12/13							Delivery Issues	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/12/13							Delivery Issues (Good Faith)	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/12/13							No Reponse!	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/11/13							Billing/Collection issues	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/11/13							Delivery Issues	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/11/13						22 weeks	June order	Sold back.	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#

									13090180/complaints#
12/11/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/10/13	12/09/13	12/10/13	1	\$56,218.00	40AGE				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=YKxGdWNLw+Y3v9ZvA/yhg==
12/10/13					ASE	15 weeks	8/27 order	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/10/13				\$109,228.00	80 CGM	11 weeks	9/30 order	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/10/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/09/13	12/02/13	12/13/13	11	\$40,230.00	1500ASE	16 weeks	8/23 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=1MdCownU3wFj2kTb8BWqA==
12/09/13	12/02/13	12/09/13	7	\$53,027.00	40AGE	8 weeks	10/15 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Q1RBLbXBjI1spD+paPRCMA==
12/09/13	12/02/13	12/09/13	7	\$12,530.00	500 1oz silver coins	27 weeks	6/7 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=7lgEwfKhvygoG9IKhebXsQ==
12/09/13				\$16,559.40	silver	12 weeks	9/18 wire	BBB	
12/09/13				\$38,956.50	30 CGM	9 weeks	10/11 wire transfer	BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/09/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/09/13						Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/06/13				\$26,766.00	20 AGE	Delivery Issues		BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/06/13		12/04/13		\$41,800.00	30 AGE	20 weeks	7/23 wire	BBB. Received check 12/4/13.	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/05/13	12/04/13	12/04/13	0	\$50,612.00	40 1-oz gold coins	1 week		Really a non-issue.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=jd2sNBqIElovsKhWGpSfmA==
								Tulving bought back	http://www.businessconsumeralliance.org/FullComplaint.aspx?

12/05/13	12/04/13	12/05/13	1	\$26,766.00	20 1-oz gold coins	8 weeks			at a loss to customer	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=5Ri26/ZHhRpBeHvHA/x21Q==
12/05/13	11/27/13	12/11/13	14	\$11,270.00	500 ASE	14 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=azD0HPKCC2/Bo5YcDlG5dQ==
12/05/13	11/26/13	12/11/13	15	\$28,063.00	20 1-oz gold coins	15 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=I4oPi0mejPO33bOEd74tcQ==
12/04/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/04/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/04/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/04/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/02/13	11/26/13	12/02/13	6	\$50,321.70	\$3000FV 90% silver	7 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=o6PLDEPb5+kGIT7H+yUUA==
12/02/13	11/25/13	12/06/13	11	\$22,000.00	1000oz silver	20 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=xMg3GhExcVw+7pLdcnk4fw==
12/02/13	11/22/13	11/27/13	5	\$56,100.00		22 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=h2ndZNuerFesb1A5QgMLiQ==
12/02/13	11/22/13	11/26/13	4	\$12,610.00	500 ASE	4 weeks	10/28 wire transfer			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=+RYO3qRxt/7SU1wcUMsllg==
12/02/13	11/22/13	12/04/13	12	\$57,073.50		14 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=EAPBZqefk6PicnY5Q+XwsA==
12/02/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/02/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
12/02/13						Delivery Issues			BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
11/29/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
11/28/13						Delivery Issues			BBB	http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-

										13090180/complaints#
11/28/13						Delivery Issues		BBB		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
11/28/13						Delivery Issues		BBB		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
11/27/13						Delivery Issues		BBB		http://www.bbb.org/orange-county/Business-Reviews/coin-dealers-supplies/the-tulving-company-inc-in-newport-beach-ca-13090180/complaints#
11/25/13	11/20/13	11/26/13	6	\$22,680.00	100 10oz silver bars	14 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=iAAULCpL3B9CWf11Sj6Dw==
11/25/13	11/20/13	11/25/13	5	\$26,544.00	20AGE	8 weeks	10/1 wire transfer			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=/H8FVHSdZroDEaan73yMKA==
11/25/13	11/20/13	11/25/13	5	\$11,850.00	500ASE	18 weeks	7/25 order			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=TxRtczJGU7cUg+z8FF6qA==
11/25/13	11/15/13	11/25/13	10	\$27,250.00	20CML			Sold back the coins because of the delay, didn't get check		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=OvbAbLaKVcg2amMuiH1v6g==
11/25/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/22/13	11/18/13	11/22/13	4	\$41,232.50	30AGE	15 weeks	8/9 wire transfer			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=QKHnXmDfSwUTrV29qbSEQ==
11/22/13	11/14/13	11/20/13	6	\$27,698.00	20CML	14 weeks	8/15 wire transfer			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=jq9S//qiA7P+ULOPvr5iw==
11/22/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/22/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/22/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/21/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB		www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#

11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/20/13	11/14/13	11/20/13	6	\$22,000.00		16 weeks	8/5 order		
11/20/13	11/15/13	11/20/13	5	\$12,330.00	500ASE	21 weeks	6/29 ship date		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=raAZv54uGPzF7Gy1ncITSw==
11/20/13	11/15/13	11/20/13	5	\$11,760.00	500ASE	16 weeks	8/6 check recd		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=nZ2oR/TmoK24e5Kdwet9VQ==
11/20/13	11/14/13	11/20/13	6	\$27,698.00	20CML	14 weeks	8/16 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=jq9S//qiA7P+ULOPvr5iw==
11/20/13	11/14/13	11/20/13	6	\$11,870.00	500ASE				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=PYx/w311zc8aEldysmHatA==
11/20/13	11/08/13							DUPLICATE_REMOVE	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=O5ZD86H/ouwbioSGh2hhKw==
11/19/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/18/13				\$108,000.00		Lawsuit [2:13-cv-02364-BSB]			http://dockets.justia.com/docket/arizona/azdce/2:2013cv02364/820763
11/18/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/18/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/18/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/18/13	11/14/13	11/25/13	11	\$11,560.00	50 10oz Amark bars				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=5dr14XTbW1U7gpOQtoJPBA==
11/15/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/15/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
								Selling back. Tulving	

11/14/13	11/08/13	11/19/13	11	\$12,250.00	500oz silver	21 weeks	6/26 order	makes it sound like customer wanted a refund, and Tulving did a favor by buying back at current (higher) prices.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=O5ZD86H/ouwbioSGh2hhKw==
11/13/13	11/01/13	11/15/13	14	\$12,215.00	500ASE	8 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=11BhUW/UOeKUjI1SgqWoZQ==
11/13/13	11/01/13	11/15/13	14	\$62,800.00	2500ASE	23 weeks	6/7 wire transfer	Refund denied.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=FeEaJGQ/fxrN1iBEB/X5Q==
11/13/13	11/05/13	11/15/13	10	\$12,105.00	500CSM	21 weeks	6/21 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=4/OHjJ9Kye6X96+Qtink7w==
11/13/13	11/05/13	11/15/13	10	\$12,590.00	500 1oz silver coins	20 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=tWHmrIdFAdOxaAHbKMjK6A==
11/13/13	11/06/13	11/13/13	7	\$26,000.00	1000ASE	10 weeks	9/9 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=EnQabQU6vvTOAiGn6ddbQ==
11/13/13	11/07/13	11/15/13	8	\$12,580.00	500CSM	9 weeks	9/18 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=MWg3AX+QCU7V03MS1PnpAw==
11/13/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/12/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/11/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/07/13						Delivery Issues		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/06/13						No Reponse!		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/06/13						No Reponse!		BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/06/13	10/30/13	11/08/13	9	\$71,172.50	50AGE	10 weeks	9/4 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=QUglBAHR0IIFeA9QLAXatg==
11/06/13	10/30/13	11/15/13	16	\$23,880.00	500 1oz silver rounds	14 weeks	8/14 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=tmgzQw7c9zzKqGoaxmDmw==
11/06/13	10/30/13	11/07/13	8	\$12,470.00	500ASE	5 weeks	10/8 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=6q3HpbhUxgS6HTp49RRupA==
								Tulving	

11/05/13	10/23/13			\$25,060.00	1000ASE			10/8 wire transfer	refuses to ship until another order, placed a week later, is paid for.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=βgZPx5wKcVyCH6xkUVk/w==
11/05/13						Delivery Issues			BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/05/13	10/29/13	11/08/13	10	\$12,420.00	500ASE	13 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=uKKCWEGZxGkH25mASboXMw==
11/05/13	10/29/13	11/08/13	10	\$28,317.00	20AGE					http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=pt6Dl3b6/gtuxeA5QEiZrg==
11/05/13	10/29/13	11/08/13	10	\$49,851.25	35AGE	17 weeks			Was offered a refund at a loss.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=4Oto6wgAnYz5dI2bAiUHw==
11/04/13	10/29/13	11/05/13	7	\$48,481.00	20AGE+10 100oz JM silver bars	20 weeks		6/21 order	Sold back 10/16 and 10/21, waiting for check.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=y+86gVWTprM/qAeO9GRa2g==
11/04/13	10/24/13	11/08/13	15	\$70,000.00	5 10oz Perth Mint gold bars	20 weeks		6/21 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=zD04Y2t+oCUxjCVw9lVqIg==
11/01/13						No Reponse!			BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
11/01/13						No Reponse!			BBB	www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints#
10/31/13						Delivery Issues			BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/31/13						Delivery Issues			BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/31/13						Delivery Issues			BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/31/13	10/25/13	11/01/13	7	\$51,900.00		16 weeks		7/11 order	Sold back (not at a loss), check took 2 weeks to be delivered.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=kCkyN/oQ5mKZ9lrP6nfEA==
10/31/13	10/22/13	10/31/13	9	\$28,000.00	20AGE	9 weeks				http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=6YLIZd4GtF5tpv6JbQdJ6g==

10/31/13	10/22/13	10/31/13	9	\$23,785.00	1000ASE	12 weeks	8/9 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=+3KaM6znodluXrYFG08+JA==
10/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/30/13						Delivery Issues (Good Faith)		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/29/13	10/18/13	10/31/13	13	\$42,874.50	30AGE	20 weeks	6/17 check cashed		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=BAE9LjIWvDifBWWGAQFomg==
10/29/13	10/21/13	10/29/13	8	\$12,985.00	500ASE	10 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=wSWzjumK7j0Wr09DrmL7eg==
10/29/13	10/17/13	10/29/13	12	\$24,920.00	1000ASE	20 weeks	6/17 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=C3WsuBTpu9kUCqKZ+3YQw==
10/29/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/28/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/28/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/28/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/25/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/25/13	10/16/13	10/29/13	13	\$32,235.00	1500CSM	17 week delay	6/28 wire transfer	Sold back (not at a loss), check will be mailed soon!	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=/ml6mM162yA6NyXOUokfiA==
10/25/13	10/17/13	10/25/13	8	\$13,060.00	500CSM			Shipping today (8 days after complaint filed)	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=ptTkv2ad/1QUFk79uwTbcg==

10/25/13	10/21/13	10/25/13	4	\$11,590.00	50 10oz NTR silver bars	10 week delay	8/15 wire transfer	Customer sold for a loss, did not receive check when promised!	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=tpafF7o8Qdbm/p4NcwaLWQ==
10/24/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/23/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/22/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/24/13	10/03/13	No Response		\$11,230.00	500CSM	13 weeks	7/26 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=rgmfeznMeOLO7zuCHLJSg==
10/22/13	10/14/13	10/22/13	8	\$11,880.00	500CSM	6 weeks	9/13 funds received	Promised 2 weeks when ordered, then later told 2+ months	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=CKuOW4IATfUSgLglazv7gQ==
10/21/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/18/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/18/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/18/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/17/13	10/11/13	10/22/13	11	\$12,745.00	500ASE	22 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Rs/AuZLurXky5AUK++R75g==
10/17/13	10/09/13	10/22/13	13	\$25,443.00	20 CML	17 weeks	6/26 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=yQVdpWqvAdX+OX/rHUX4gg==
10/17/13	10/11/13	10/22/13	11	\$54,030.00	40 1oz gold bars	3 weeks	10/2 order		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=r1UgScZ8z7AZ6t/Agi7rlw==
10/17/13	10/11/13	10/17/13	6	\$297,418.00	Gold/silver	6 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=tGX/0+ErFqGWdU4tuay67A==
									http://www.bbb.org/los-angeles/business-reviews/coin-dealers-

10/17/13						Delivery Issues		BBB	supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/17/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/17/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/16/13	10/09/13	10/16/13	7	\$15,244.00	20 1oz Palladium Maples	7 weeks	8/26 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=9DmeTOwivchn8ax2BZtxvw==
10/16/13				\$20,000.00		8 weeks			https://www.kitcomm.com/showpost.php?p=2117426&postcount=30
10/16/13				\$200,000.00	150CGM				http://www.courthousenews.com/2013/10/17/621111.htm
10/16/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/16/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/16/13						Delivery Issues (customer not satisfied)		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/15/13						Delivery Issues (customer not satisfied)		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/14/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/14/13						8 weeks	Ordered mid-August	Told 10-14 days to ship, as they were behind.	http://golddealerreviews.com/reviews/gold-dealers/3-tulving
10/13/13						14 weeks			http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-Rating/page2
10/11/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/10/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/10/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
								Sent coins,	

10/08/13				\$240,000.00	220 AGE	5 weeks		has not received payment.	http://www.bullionstacker.com/viewtopic.php?f=2&t=11077&start=80
10/08/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/04/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/04/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/04/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/04/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
10/03/13						13 weeks			http://golddealerreviews.com/reviews/gold-dealers/3-tulving
10/02/13	10/02/13	10/16/13	14	\$57,000.00	40AGE	22 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=3aY7gh7Nmi+zFbbBs1ZiHQ==
09/30/13	09/30/13	10/07/13	7	\$11,670.00		9 weeks	Ordered 7/30/13		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=gDCfg1UITWx6nwbfnRsVQ==
09/27/13	09/27/13	10/07/13	10	\$27,025.00	1000ASE	5 weeks	9/4 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=X21LFs+d7Kgwa5hQckmYcQ==
09/23/13				\$20,000.00	1000ASE	5 weeks	8/16 wire transfer	Told they can only send so many pounds per day.	
09/23/13	09/23/13	09/27/13	4	\$206,330.00	7000 1oz silver Candian Wildlife	24 weeks	4/12 wire transfer	Reports that in August Hannes Tulving told Karen that she could only discuss what was being shipped that day, not future shipping dates.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=iXl+QE6oUtGKs8PjzGfj7w==

09/23/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/23/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/20/13	09/20/13	09/27/13	7	\$11,000.00	500ASE	12 weeks	6/27 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=P/5PdilsokIsdRdHOlsUvA==
09/20/13	09/20/13	09/24/13	4	\$16,471.50	50 5peso	6 weeks	8/15 wire transfer	Told it could be up to 3 months	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=my/G5Evtwimex5sOw2X+g==
09/20/13				\$200,000.00		22 weeks	Sent money mid-April		http://www.tfmetsreport.com/forum/5076/tulving-warning
09/19/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/19/13						Delivery Issues (customer not satisfied)		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/18/13	09/18/13	10/08/13	20	\$196,500.00	Trade gold-gold	19 weeks	5/7 wire transfer	¼ recd 8/13. Told they are 'backed up'.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=q3pu31bAie0Z8x/X6Tj3yQ==
09/17/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/17/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/17/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/16/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/12/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/10/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
09/05/13				\$20,000.00	Several boxes ASE	12 weeks		Received shortly after contacting a	http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-Rating/page2

								lawyer.	
09/04/13	09/04/13	09/11/13	7	\$63,000.00	40AGE+500ASE	11 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=k+fg5J1+acG+1oIxWfdZA==
09/04/13	09/04/13	09/18/13	14	\$195,100.00	6000ASE+2000CSM	11 weeks	6/20 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=bfjK7LLgs1QJVeX/wV+c2A==
09/04/13						Delivery Issues (customer not satisfied)		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/27/13	08/27/13	08/29/13	2	\$10,475.00	50 10oz NTR silver bars	4 weeks	8/5 wire transfer	Told it could be 1-2 or more months.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=w8VumK0F0TEZJpdWrRhVw==
08/26/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/26/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/22/13	08/22/13	09/03/13	12	\$46,171.50	30 CGM	20 weeks	4/15 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=oC5sKRhd2wtrZwVxRYGbw==
08/22/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/21/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/20/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/19/13				\$20,000.00	1000oz silver	15 weeks	Ordered in May		http://golddealerreviews.com/reviews/gold-dealers/3-tulving
08/19/13				\$251,160.00	3000ASE, 150 1oz bars	8 weeks			http://gold-silver.us/forum/showthread.php?71932-Tulving-having-delivery-issues
08/19/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
08/19/13						10 week delay			http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-Rating/page2
									http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-

08/18/13				\$50,000.00		13 weeks			Rating/page2
08/16/13	08/16/13	08/18/13	2	\$27,817.00	20 CGM	8 weeks	6/19 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=6qroBIFenPD3qbOsZlh/MA==
08/15/13						15 weeks			http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-Rating/page2
08/12/13	08/12/13	08/13/13	1	\$12,630.00	5 100oz RCM silver bars	13 weeks	5/13/2013 wire transfer		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=GsnD5O03nh1SMmCkjPGU1A==
07/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
07/30/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
07/19/13	07/19/13	08/19/13	31	\$26,149.00	20 1-oz gold coins	4 week delay			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=rLkAlkWler9srxrgpgnNKhA==
07/17/13	07/17/13	07/19/13	2	\$45,508.50	30oz platinum	5 weeks			http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Pm5M+xNz7Z7BG2NxiCJ69A==
07/10/13	07/10/13	07/11/13	1			8 weeks	Ordered 5/15/13		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=yCzRMDhrnABVD06eWcGosQ==
07/01/13	07/01/13	07/01/13	0	\$60,906.00	40 1oz gold bars	11 weeks	Ordered 4/12/13.		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=PW1eiPnfSq4o4Pdp9HG NRQ==
06/27/13	06/27/13	07/02/13	5	\$160,915.00	100CGM	11 weeks	Ordered 4/8/13		http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=O7AyFGneVX4pNN+xCdugSg==
06/21/13	06/21/13	06/24/13	3	\$36,090.00	1500oz silver	5 weeks	5/15 order	Told it would be a couple of weeks.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=f+tFF2YYbYQ4Qm7cHFhSgQ==
06/18/13	06/18/13	06/19/13	1	\$29,169.00	20 AGE	8 weeks	Check cleared 4/22	Told she would receive coins 30 days after check cashed, did not.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=Gp2hNX0db5Eap5V9UG5i7Q==
06/12/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
06/11/13						Delivery Issues		BBB	http://www.bbb.org/los-angeles/business-reviews/coin-dealers-supplies/the-tulving-company-in-newport-beach-ca-13090180/complaints
02/28/13				\$68,951.00	Gold coins	1+ month delay.	1/28 wire transfer	Told it would be shipped 2/12, did not.	http://www.businessconsumeralliance.org/FullComplaint.aspx?ID=iu+ikSm9KKb13yyABwyag==
								Said he got	

02/12/13					3 week delay.	many excuses.	http://www.goldismoney2.com/showthread.php?168-Tulving-Dealer-Rating/page2
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Exhibit I



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Home » Forums » Bullion & Coin Dealers

Tulving Warning !!!!!

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Last Post

16 posts / 0 new

September 20, 2013 - 10:55am

#1

1 Founders Fan



OFFLINE
Joined: 09/19/2013
Hat Tips: 25
Posts: 6

Tulving Warning !!!!!

Hannes Tulving of tulving.com has had over \$200K of my money for over five (5) months, has not shipped my orders, will not provide a full refund, and will not communicate about the matter. The public deserves to know his business may be turning into a ponzi scheme funding his retirement.

Being a long term lurker, I have learned a lot from the Turdville community and am very grateful. Having little to add, I never created an account until today.

My reason for getting an account is to warn others about dealing with Hannes Tulving. I bought from him in 2012 and got the product three weeks later. Tulving has had over \$200K of my money since mid April 2013, but has failed to deliver my silver bullion orders. I have not been able to reach him by phone or get a response by email. Speaking to Karen about shipment has been futile, and he has restricted her knowledge even more since August. Something significant has changed in recent months with Tulving. The LA BBB shows 19 complaints closed since March 2013.

Fifteen of those complaints are dated since July 30th, and eight of those are dated since August 30th. There is no telling how many victims are out there. Also, clients are logging warning complaints on numerous websites, including:

- <http://www.tfmetalsreport.com/>
- <http://gold-silver.us/forum/showthread.php?71932-Tulving-having-delivery-issues>
- [http://golddealerreviews.com/reviews/gold-dealers/3-tulving,](http://golddealerreviews.com/reviews/gold-dealers/3-tulving)
- <http://www.businessconsumeralliance.org/PublicComplaints.aspx?CompanyID=13090180>and other forums.
- <http://bestonlinegolddealers.com/>
- <http://www.pmbug.com/forum/f8/tulving-having-issues-2517/>

The tulving.com website has outrageously deceptive and misleading claims regarding shipping practices.

http://tulving.com/New%20Pages/free_overnight_shipping.htm states: "Are You Tired Of Waiting Weeks Months For Your Bullion From Other Dealers? We Offer Free Overnight Shipping Within 48 Working Hours Of Receipt Of A Wire!" "Silver is typically shipped within about 5 working days after receipt of your wire." The website indicated the products I ordered were in-stock, and this was confirmed by phone when placing the orders -

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SHOP

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Join Andrew Maguire and Turd's Army
BEAT THE CARTEL AT THEIR OWN GAME!

but they can not deliver for over five months? The website also states that a buyer may not cancel an order that has been placed without facing legal collection action, including legal fees, but Hannes acts like he has no obligation to complete a transaction, or be respectful to his clients.

To be clear, I have been aware of Hannes' reputation for being an a\$\$.. I have always been courteous and to the point on business with him. Our only interaction has been a few brief phone calls to quickly place orders. He has no reason to put me on his revenge list.

Tulving has had over \$200K of my money for over five months, has not shipped, will not provide a full refund, and will not communicate about the matter. The public deserves to know this may be turning into a ponzi scheme funding his retirement.

Top

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Tags: Bullion & Coin Dealers fraud theft Tulving

September 20, 2013 - 3:18pm

#2

Dyna mo hum

You



OFFLINE
Joined: 06/24/2011
Hat Tips: 9154
Posts: 1453

really need to talk to the district attorney in the jurisdiction where this crime was committed now!

Top

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September 20, 2013 - 7:12pm

#3

Spartacus Rex

@ 1 FF



OFFLINE
Joined: 04/12/2013
Hat Tips: 5736
Posts: 1283

Actually you would be wise to type up a Notice of Complaint (NOC) simply stating the facts of the Matter, Tulving's default and refusal to deliver or refund, and your request for immediate action to cure default. Then have your NOC Notarized (easily done at any one of those Mailboxes Etc, / UPS or FedEx Stores, and then make 6 or 7 copies of the Notarized NOC and then send by either Certified or Registered U.S. Mail to each of the following 1) Tulving; 2) California Attorney General (AG); 3) Your State's AG (If you do not live in California); 4) The U.S. Atty General. BTW, make sure that on the bottom of the NOC you cc'd all of those AGs Names so when Tulving gets your NOC, he will damn sure realize the gravity of situation of those AGs being contacted in writing, and move like lightening to make you happy. In the future you would be wise to use Texas Precious Metals for your online Bullion purchases (fifth generation run family business, 5 star rated & they don't sell/accept your funds for what they don't have in inventory!) <https://www.texmetals.com/>

Top

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September 20, 2013 - 9:57pm Response to: @ 1 FF

#4

1 Founders Fan

Tulving scam



OFFLINE

Many thanks for the advice, and the feedback on Texas Precious Metals.

Your HAA purchases help support TFMR



Hard Assets Alliance Launches SmartMetals™ Trading Platform for Individual Investors

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Hat Tips - Forums

- Healthy Food and Healthy Living
Hat Tips: 14
- Pagnani Mint
Hat Tips: 2
- The misconception that byproduct silver mining is "free"
Hat Tips: 2
- How Events in China & Germany Could Derail the Fed's Taper Plans
Hat Tips: 1
- Blythe Masters Joining CFTC
Hat Tips: 1

Joined: 09/19/2013
Hat Tips: 25
Posts: 6

Top

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September 26, 2013 - 12:22am

#5

stealthbear



ONLINE
Joined: 07/11/2011
Hat Tips: 1331
Posts: 192

Tulving concerns-1FF

I am so sorry to hear about your problems with Hannes Tulving. The amount of your money that he has possession of just makes me feel sick. I have bought most of the metal I have from Tulving from 2006 to 2010. (I would estimate my total purchases at over \$300,000 as I was purchasing for several family members and friends as well as myself.) At that time shipping was immediate, as in overnight, for both gold and silver bullion. I ordered from Hannes because of his low prices and free shipping, but I found out from speaking to the man, himself (he used to be the only one who answered the phone to take orders), that he had NO people skills at all. I did not call him to ask what he thought about where the metals were going. My calls were strictly business....to tell him what I wanted to order and how much. Even that short exchange occasionally brought out his worst side, for whatever reason, resulting in snappish and rude exchanges on his part if I misunderstood what he said. I was immensely relieved when he hired some other people to take phone orders.

I placed my last order with tulving about 3 years ago and it was my last because things had definitely changed, Instead of receiving my order overnight, as i had previously, this order did not come for weeks. I had emailed Hannes to inquire about it, and received a very terse email response from him to "call Karen". I did this and was told that their insurance only allowed a certain monetary amount to be shipped out each day, so I would have to wait until my order came up in line on that basis. I waited for several weeks and called Karen a few times during that period. My anxiety level went up daily! As it turned out, I did finally receive the goods, but by that time vowed never to order from them again.

I sincerley hope that you get the merchadise you have paid for. If not, I hope you are successful in "frying" the guy. Seems like he deserves it!

Top

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October 18, 2013 - 1:20pm Response to: [Tulving concerns-1FF](#)

#6

1 Founders Fan



OFFLINE
Joined: 09/19/2013
Hat Tips: 25
Posts: 6

Other victims

Other victims continue to contact me, but have not added their complaints in this forum. Please share your experiences here.

Top

Login Or Register To Post Comments

October 21, 2013 - 10:38pm Response to: [Other victims](#)

#7

1 Founders Fan



Unbelievable - list of victims growing

New warning, as the number of complaining victims grows! Delayed or no delivery/cash payout. Routinely operating outside the terms of business stated on Tulving.com.

<http://about.ag/tulving.htm#.UmXeVnaN5iU.email>

Hat Tips - Comments

Non-intervention is not an option????????? bullshit!

Hat Tips: 51

Toys for Stoopid Parents to buy their kids

Hat Tips: 49

BTW, Real History is NOT what you have been taught

Hat Tips: 46

Again

Hat Tips: 43

Non Intervention IS an option

Hat Tips: 37

Recent Comments

- **"deep storage"** by silverwhere
A2A with Greg Mannarino of TradersChoice.net
4 sec ago
- **@ Bollocks** by AlienEyes
Lawsuit Regarding the London Gold Fixing
1 min 19 sec ago
- **Another Bitcoin casualty--28 year old woman . . .** by ancientmoney
Lawsuit Regarding the London Gold Fixing
4 min 43 sec ago
- **ABSOLUTE BULLSHIT** by Maestro
A2A with Greg Mannarino of TradersChoice.net
7 min 17 sec ago
- **"deep storage"** by realitybiter
A2A with Greg Mannarino of TradersChoice.net
10 min 19 sec ago

more

This Month's Leaderboard

Username	Hat Tips Earned
Mr. Fix	1370
ag1969	1174
Bollocks	827
Pining 4 the Fjords	788
Dr Jerome	780
dgstage	726
ancientmoney	609
argentus maximus	605
ivars	596
DayStar	568

OFFLINE
 Joined: 09/19/2013
 Hat Tips: 25
 Posts: 6

Tulving Company Update

[As of 18 Oct 2013, we have tracked 82 complaints of delivery delays this year, averaging about \$70,000 per order, for an estimated \$5,730,616 of orders delayed about 3-5 months:] see link for complete report

And these are just the public complaints!

Top

Login Or Register To Post Comments

October 31, 2013 - 10:03am Response to: [Unbelievable - list of victims growing](#) #8

mymotherskeeper



OFFLINE
 Joined: 06/15/2011
 Hat Tips: 244
 Posts: 53

New warning, as the number of

New warning, as the number of complaining victims grows! Delayed or no delivery/cash payout.

hey founders fan...so sorry to hear of your difficulty with tulving~

please do let us know how things progress for you. we care and we wish you well!

thanks, k

Need Little - Want Less - Love More

Top

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November 21, 2013 - 3:14am #9

Spartacus Rex



OFFLINE
 Joined: 04/12/2013
 Hat Tips: 5736
 Posts: 1283

1 FF

So, it's has been two months now. Any update or success with Tulving yet?

Top

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November 21, 2013 - 10:38am Response to: [1 FF](#) #10

Nick Elway



OFFLINE
 Joined: 06/14/2011
 Hat Tips: 2903
 Posts: 617

about.ag updated

<http://about.ag/tulving.htm>

[13 Nov 2013 Update: For the first half(ish) of November, the number of complaints has gone down about 25%, suggesting that the end is near -- either Tulving is back on track slowly heading towards normal shipping, or 'the jig is up'.]

[As of 01 Nov 2013, we have tracked 111 complaints of delivery delays this year, averaging about \$70,000 per order, for an estimated \$7,566,612.00 of orders delayed about 3-5 months:]

Top

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November 23, 2013 - 7:07pm Response to: [1 FF](#) #11

1 Founders Fan

Update

New public complaints continue to be added on the BCA website (<http://www.businessconsumeralliance.org/complaints/the-tulving->



OFFLINE
Joined: 09/19/2013
Hat Tips: 25
Posts: 6

company-inc-13090180). BCA staff have developed direct communications with H. Tulving, and they attempt to resolve disputes. For some reason, H. T. is responsive to BCA inquiries, but he is not to his customers. From my experience, the BCA is the only way for a customer to get any response from the dirtbag.

On the advice of legal counsel, since Tulving refused to deliver my products or give a full refund of my deposit, I got as much cash back from him as possible. The risk of him claiming bankruptcy, like he did in the early 90's, and loosing all of my money pretty much forced me to take what I could get. Tulving calls it a "buy-back" separate transaction, but I never received any silver to sell to anyone, and it was never my intention to sell so soon, or in such volume. It was a cram-down deal that left me over \$33K in the hole. In addition, reduced availability and substantially increased premium pricing of the coins I had on order for over five months, now means I can not find a similar deal. While spot price declined, the price to buy the same coins did not decline in unison; Tulving pocketed the advantage.

After waiting for my coins or a full refund for over five months, and Tulving's total refusal to communicate with me, it was very interesting how fast they processed my "buy-back." In under one-half hour three staff members had touched it and they had it documented in their system.

Mr. Tulving's character was further displayed by the manner in which he issued my partial refund. Rather than cutting the check within three business days and sending it overnight, as stated on Tulving.com and by his staff, the amount due was returned in three separate checks that took almost two weeks and further help from the BCA to get delivered.

Further actions on this matter remain in play on several fronts. Once the dust settles, I will provide more feedback.

Top

Login Or Register To Post Comments

November 27, 2013 - 12:02pm

12

Axil



OFFLINE
Joined: 04/13/2013
Hat Tips: 12
Posts: 6

Thank you Founders Fan

Thanks for your post Founders Fan,

I too have had a problem with H. Tulving's, presently 3 month delinquent delivery of 3 monster boxes of 2013 American Silver Eagles. I hate to state the purchase price given the current spot price, but you get the picture. If I could just receive the PMs I wouldn't worry, having an optimistic long term confidence of where the values of all metal are going.

Thanks for the Business Consumer Alliance website link. After going there and seeing the positive results that they have produced from Tulving my stress level from potentially loosing \$40k is much reduced. I submitted my complaint today, so will sit back and see how this plays out...

Will post an update with complaint response.

~My Life, My Fortune, My Sacred Honor~

Top

Login Or Register To Post Comments

February 13, 2014 - 2:53am

13

Axil



OFFLINE

Situation resolved

UPDATE;

After 100+ days since placing my order and 3 weeks after getting the Business Consumer Alliance involved, I received a tracking number from Hannes Tulving Co. Two days later I received my product. The stress of

Joined: 04/13/2013
Hat Tips: 12
Posts: 6

dealing with the Tulving Co. is not worth the savings from buying in bulk from them. I'm going elsewhere from now on for my metal purchases.

Thank you all for the GREAT advice that helped in resolving this potentially VERY expensive situation...

Y'all have a Blessed Day now ... Y a hear?

Top

Login Or Register To Post Comments

February 14, 2014 - 1:27am

14

Patriot Family



ONLINE
Joined: 03/10/2012
Hat Tips: 1815
Posts: 224

That's great news!

Very happy this worked out for you!

Knives are our business. Get in touch if you need a high quality pocket, survival or folding knife!

Top

Login Or Register To Post Comments

February 25, 2014 - 1:52pm

15

firstsilver



OFFLINE
Joined: 06/14/2011
Hat Tips: 1291
Posts: 207

Good that the opinion tide has turned

A couple of years back someone posted a complaint on this site about Tulving failing to deliver a purchase and got drowned out by people defending the guy -- said he was just rough around the edges and all that. I thought this was curious because this same rough-around-the-edges guy had legal trouble previously for failing to deliver on purchases. In 1991 his earlier business had filed for bankruptcy -- as had he on a personal basis -- and the company had been alleged to have committed fraud by the FTC. I thought this was more than just a guy with poor people skills.

So, I've avoided Tulving and bought elsewhere. Now Tulving is in big trouble -- again.

Fortunately, he doesn't seem to have the pack of supporters posting here to justify his misconduct. I guess that's the good news.

Top

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March 4, 2014 - 12:29am

Response to: [Situation resolved](#)

16

starrdog



OFFLINE
Joined: 08/05/2011
Posts: 1

Just in time!

According to

<http://about.ag/tulving.htm>

Tulving is now out of business and no longer answering their phone. Good thing you contacted BCA when you did.

Top

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Comment viewing options

Flat list - expanded

Date - oldest first

Save settings

Select your preferred way to display the comments and click "Save settings" to activate your changes.

Next topic: JM Bullion >

 Comments for "Tulving Warning !!!!!"



Lk 12: 22-34

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Exhibit J



Looking for a business?

Business Name Category or Keyword

Login Login

Company Report

[» View Business Storefront](#) [ShareThis](#)

The Tulving Company, Inc.

Category: **Coin Dealers and Supplies**

Address: P.O. Box 6200
Newport Beach, CA 92658
(800) 995-1708

Website: <http://www.tulving.com>

Social:

Hours: Hours of operation 24 hours 7 days a week.

Primary Contact: Hannes Tulving Jr. (President/ Owner)

Business Started: 10/25/1990

Record Created On: 11/11/1998

This company's business is buys and sells coins.

Company Rating

F

The rating assigned to a business is determined by our composite score of such factors as its type of business, compliance...

[» Full Rating Explanation](#)



See more photos on [» Storefront](#)

6156 page views

Quick Links

[» View Business Storefront](#)

The Tulving Company, Inc.

based on 5 reviews.

Customer Reviews & Ratings

Do not send Hannes Tulving your money! I Cant even give him ONE STAR

E.Z.

Posted on 1/14/2014



2 Reviews
0 Answers

He has earned ZERO stars. He actually has earned a negative 20 stars! I wish my husband had read a little more of the reviews before sending Tulving \$21,000.00. Our order is 6 months old. We have filed a complaint with BCA, have contacted three police departments, and are writing letters to other organizations. We might have to work hard to get our silver from him, and are prepared to do so. But, I would like to see him stopped before others get hurt. Many people are getting hurt by him. NO, do not give this guy your business! By taking so long to fill your order: His scheme is to "scare" you into thinking that you might loose everything, that when he offers to buy "your silver" back, and you fall for it, then that is when he earns his profit off of you. Get it!? Eight months after wiring Tulving the money, our silver arrived. We were prepared to take him to court, so that may be what you will have to do, too.

[» Send a Message](#)

Was this review...? [» Flag this review](#)

[» Read Reviews On Storefront](#)

Complaint Closing Statistics

Responses to complaints over the last 3 years:

No. of Cmpl	Type of Response
17	Making a full refund, as the consumer requested
2	Making a partial refund
220	Agreed to make an adjustment

Comments and Analysis

BCA's Comments and Analysis

Buying rare coins can be risky because of the absence of consumer protection standards. Coin investments carry no guarantee of a profit, do not pay interest or dividends, generally must be held onto for several years, and do not appreciate rapidly. L... [» View More](#)

Licensing

We know of no licensing or registration requirement for companies engaged in this company's stated type of business.

Other Considerations

As of March 3, 2014, we believe The Tulving Company is out of business and are no longer answering phone calls. Our office is continuing to process complaints. Please contact our Customer Service Department for further assistance at (909) 825-7280.

Additional Information

DBAs:
Tulving Company

Membership Information

This business is not a member of Business Consumer Alliance. This fact does not disparage the company in any way.

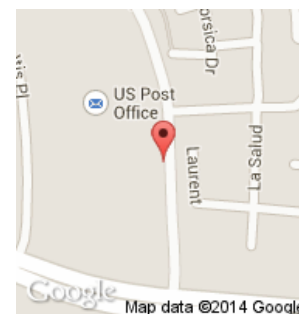
[» Add our dynamic seal to your site to promote your business!](#)



Suggested Members

[View BCA Members in our Coin Dealers and Supplies directory.](#)

Map & Directions



2	Refusing to make an adjustment
3	Refuse to adjust, relying on terms of agreement
66	Unanswered
0	Unassigned

Total: 310 complaints

Websites:

There are no additional web sites.

Contacts:

Karen
Dave
Braden Stiller

Addresses:

750 West 17th Street Suite A, Costa Mesa, CA, 92627
2100 West Oceanfront Blvd., Newport Beach, CA, 92663

[» Get Directions](#)

Complaint Experience

BCA's Summary and Analysis of customer complaints and company responses:

Most complainants allege coins ordered "in stock" do not arrive as promised or advertised by the company and their website. Some complainants allege that when they contact the company regarding the delay, they are told to expect further delays, although payment has already been wired to the company... »

[View More](#)

View summaries of the complaint descriptions, responses and text of the complaints.

[View Complaints](#)

Government Actions

BCA has no information regarding government actions at this time.

Advertising Review

BCA has no information regarding advertising review at this time.

For Businesses

- Business Portal Log In
- Business Benefits
- Apply For Membership
- Dynamic Seals Program

For Consumers

- Check Out a Business
- File a Complaint
- Ask the Experts
- Find a Member Business

Help

- FAQs
- Contact Us

More

- About Us
- Blog
- Terms of Service
- Privacy Policy

Exhibit K

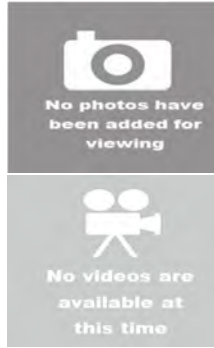


The Tulving Company

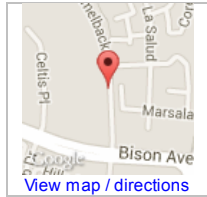
Newport Beach, CA 92658

2 stars - based on 7 reviews

This company's business is the buy/sell of coins.



Preferred Members Ancient Resource 2587 miles MERIDIAN COIN 2603 miles



Show Contact Info

Your Business?

Write a Review

Categories Coin Dealers and Supplies

Reviews (7) More About Q&A and Blogs

6780 page views



Customer Reviews & Ratings

<p>1 Posted 10/30/2013 Ildrjay</p> <p>1 0</p>	<p>Do not do business with this company.</p> <p>I purchased \$12,000 worth of silver coins from the Tulving Company over two months ago based on recommendations by a family member and a business friend. I have spoken to Tulving's customer service representative, Karen, multiple times. She stated that the owner decides when the product will be sent to the customer and that there is no rhyme or reason when he will send the product to the customer. I was refused a refund when I requested one. I no longer have confidence that I will receive the product as advertised. When a company refused to deliver the product they sold and they refuse to refund the money paid, this is probably a criminal offense. I will follow up after I contact the Attorney General for criminal charges and later when I file civil charges.</p>	<p>Was this review helpful? <input checked="" type="radio"/> Yes (10)</p> <p>Send Message to Reviewer</p> <p>Report abuse</p>
<p>1 Posted 8/20/2013 James S.</p> <p>2 0</p>	<p>Did business for years with Tulving. After 104 days for my latest order, NEVER AGAIN!</p> <p>I have done business with Tulving about a dozen times over the years in an amount that's really big money in my little world and was never impressed with Mr. Tulving's manners via e-mail but I got what I ordered and even when there was a minor problem with my order they always took care of it (sent me quarters instead of halves or had a few 40% halves in a bag of 90%, etc.). I had noticed the time it took for me to receive my order had been increasing with each order. This last order took 104 days and blew through at least six different dates that my order was supposed to ship. After nearly six weeks from my order date (and wire transfer) when I called to follow up on my order I was told Tulving couldn't get the 1000oz bar they had sold me as "in stock". I switched to silver rounds, paid the extra premium and called two weeks after I was supposed to receive my revised order and was given a new shipping date. I gave it another two weeks and called and now Karen didn't have a date. I gave it another two weeks and was treated rudely on the phone by Karen (told not to call her on Monday mornings since she was very busy then). Contacted Hannes Tulving via e-mail (which is the only means of contacting him, possibly because the stroke he had a number of years back means he can't speak well over the phone? I don't know) and was given a new date range. Guess what, still nothing. Called Karen and was told that I could try e-mailing Hannes Tulving but she couldn't do anything else. I then opened up a case with the BBB, waited a few days and sent Mr. Tulving an e-mail stating that I had done so and would be contacting law enforcement as the next step if this wasn't resolved. Much to my surprise my order shipped last Friday and arrived yesterday. I'm severely disappointed with Tulving and am done dealing with them. I suggest others beware as well. 104 days of holding my \$25,000 without a single effort on their end to contact me to inform me of any problems and blowing through numerous promises is too much for me to stomach even if I did eventually get my order. Update 08/28/13: When I filed my complaint with the BBB there were three closed complaints listed. I noticed today there are now nine complaints, the last six all within one week!</p>	<p>Was this review helpful? <input checked="" type="radio"/> Yes (10)</p> <p>Send Message to Reviewer</p> <p>Report abuse</p>
<p>1 Posted 5/24/2013 John H.</p> <p>1 0</p>	<p>Buyer beware at the Tulving Company</p> <p>They are not delivering their products. You purchase the precious metal via a wire transaction and then you wait, and wait, and wait for the product and this - Karen - lady is pathetic. No help - at all... You have our money now give us what we paid for you crooks</p>	<p>Was this review helpful? <input checked="" type="radio"/> Yes (21)</p> <p>Send Message to Reviewer</p> <p>Report abuse</p>
<p>2 Posted 4/29/2013 Matthew R.</p> <p>2 1</p>	<p>Long delays, undocumented policies, and rude customer service</p> <p>Ordered 500 ounces, confirmed they were in stock and wired the money. 3 working days later we called and they suddenly had a "7-day wait" on any shipments" even though we paid by wire within a few business hours (same day) as the order. Did ship on the 7th day, but just be aware. No where on the web-site was this talk about the 7-day wait. My first experience with them will be my last.</p>	<p>Was this review helpful? <input checked="" type="radio"/> Yes (13)</p> <p>Send Message to Reviewer</p> <p>Report abuse</p>
<p>1 Posted 11/30/2012 Daniel P.</p> <p>1 0</p>	<p>Brutal, Frightening Shipping Delays</p> <p>I have completed 4 significant purchases from Tulving over three years. The confirmation and shipping delay has gotten longer each time. My most recent was about seven months ago.</p> <p>You wire funds (and only deal in large orders), and they sit on your funds endlessly. You call and get one story about a delay, you call again and get another. Often the sales people and "Karen" (who appears to be the point person for shipping) act angry that you are curious about delays that vastly exceed what they promise on their site (which itself already promises a bizarrely long time delay from order to shipment).</p>	<p>Was this review helpful? <input checked="" type="radio"/> Yes (17)</p> <p>Send Message to Reviewer</p> <p>Report abuse</p>

In my last purchase I had to have a two day heated email exchange with the president - Hannes Tulving - in which he was alternately offended and offensive.

They sell at the lowest margins I have found - but they scare the holy hell out of me once they have my money.

There seems to be no way to do a deal with them that isn't a "trust me" followed by delays, excuses, delays, excuses and lots of wacky behavior. t has always eventually worked out on my purchases, but each has been progressively more nerve wracking.

After the last roller coaster ride I swore off buying from them. I honsetly thought I might have to sue them to get my money back or my order shipped. t just went on and on.

So now I just choose to eat the higher commissions at other places so I can sleep at night not worrying they have gone bankrupt or off to tahiti and taken my funds along with them.

1 **Review 4/19/2011**

Posted 4/19/2011
IC-kn



★ 1
! 0

I've done thousands of dollars of business with the Tulving Company in multiple transactions. I too was surprised by their F rating at the BBB. But because my previous experiences were positive, I decided to continue to do business with them. Call it customer loyalty. I deeply regret my last transaction. After the start of my last trade with the company, I found what I felt was misleading language on one of their webpages. I complained. Hannes Tulving took this very personally. Hannes refused to acknowledge my payment for my last purchase, refused to refund the payment, and refused to send me merchandise, simply saying "Too bad". He felt justified in this because I, as a complainer, was no longer a customer. This went on for many phone calls. During most of them, he or one of his staff hung up on me. He seems to have instructed his staff to hang up on me when I call -- or at any rate, Dale, one of his employees, answered the phone by saying "Guess what: we don't do business with you no more. Thanks, bye." Karen, another of their employees, was the only person at the Tulving Company who was polite to me; she tried to help resolve the problems between me and Mr. Tulving, for which I'm grateful. In the end Hannes sent me what I had purchased, and he fired me as a customer. I'm fine with that. If he is to rebuild his reputation, he must learn to treat his customers better. He must learn to handle criticism better. I know he doesn't sleep much -- perhaps he needs to rest more? I

know a lot of people who get cranky without naps. Hannes Tulving once had a good reputation. I really have no idea what happened to him, but in my experience, his new, bad reputation is well-earned.

Was this review helpful? Yes (29)

[Send Message to Reviewer](#)

[Report abuse](#)

5 **Review 2/2/2011**

Posted 2/2/2011
Dennis J.



★ 1
! 0

I was quite surprised to see the Tulving Co. listed with an "F" rating with the BBB. I have been buying and selling bullion and coins from/to Hannes Tulving for many years and have never had the slightest problem. His prices are the best that I have seen anywhere, shipping charges are included in the price, and, unlike most dealers, he doesn't even list prices for items that he doesn't have in stock and can ship immediately. It is unfortunate that such a reputable, knowledgeable, and honest dealer would be stuck with such a poor rating, apparently from the complaint of just one or two customers.

Was this review helpful? Yes (24)

[Send Message to Reviewer](#)

[Report abuse](#)

You are viewing page 1 of 1

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Exhibit L



- Gold Dealer Reviews
- Gold Bar Prices
- Best Online Gold Dealers
- Gold Dealers In Boston
- Buy Silver Bullion
- Silver Coins



HOME GOLD DEALER DIRECTORY CONTACT MY PROFILE

Tulving

1.8 (125) 30963

- Compare
- Write Review
- Claim this listing



LOCATION
 State California
 City Newport Beach
 Address P.O. Box 6200
 ZIP 92658
 CONTACT INFORMATION
 Phone (800) 995-1708

The Tulving Company has been buying and selling bullion online since 1995. They are open 24 hours a day, seven days a week for telephone or email orders. They tend to require high volume orders but in return offer competitive pricing.

The Tulving Company has been an authorized PCGS Dealer Since 1998 and NGC Dealer Since 1990.

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USER REVIEWS [View all user reviews](#)

Average user rating from: 125 user(s)

 Add new review

Overall rating	1.8
Shipping Time	1.7 (109)
Customer Service	1.7 (109)
Buying Experience	2.1 (125)

Reviewed by Kris March 05, 2014

Best attorney to hire for Tulving Issues

I like many have dealt with Tulving over the years with no problems until the last few months. I was out \$123,000 from Tulving and hired an attorney in Orange County California that was just great. She got right on my case and was able to not only file a lawsuit against Tulving but get the court to grant an emergency writ of attachment and protective order. The day after he was severed with the writ and protective order, Tulvings attorney contacted my attorney and said Tulving is going to wire my many back that day. AND TULVING DID!!! Contact me if you like and I can give you my attorneys info, she was great to work with and not to expensive. kris79247924 @ yahoo. com

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

 Comments (0)

Was this review helpful to you?  1  0 

Reviewed by Jim March 05, 2014

Dodged a bullet

I have been a Tulving customer for several years and have always received my orders in a timely manner. My last successful order with them was on April 3, 2013 which was just before the huge drop in gold prices. My order was shipped promptly.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Back in mid October 2013 I had an order ready to go and tried to call Tulving around 2:30PM Pacific Time. Nobody was answering the phone, which was unusual considering the time of day. Their website didn't say why like they normally do. For some reason I decided to look up gold dealer reviews and ran across this website and I started reading all of the horror stories. I was shocked, to say the least. Needless to say, I never ended up placing my order with Tulving, but based on recommendations here and elsewhere went with Texas Precious Metals instead.

Like I said, I guess I dodged a bullet. My order would have been around \$25K

CU TOMER' EXPERIENCE

Did You Receive What You Ordered? No

Would You Purchase From This Dealer Again? No

Comments (0)

Was this review helpful to you? 1 0

Reviewed by jollyupi March 05, 2014

DO NOT TRUST TULVING....HE IS A CHEAT

I emailed Hannes Tulving on Jan 29, 2014 to set up an account. I got the response within a couple minutes. I bought 20 American Eagle 1 Ounce Gold Coin New Solid Date Rolls on Jan 30, 2014. I wanted the gold for a special occasion in the family and I was

going to give the gold as a present in a religious ceremony. I asked the sales person if the coins were in stock and when they will ship it. I was told that the coins were in stock and they will be shipped overnight as soon as I wire them the money. I wanted to make sure I can get the gold before the ceremony. This is when the ordeal began....

I received the invoice on Jan 30, 2014 so I assumed I would be getting the delivery early next week. I did not get any delivery notification so I called the number again and the sales person told me to talk to Karen. I explained to Karen my situation and she said she understood as there was another person who had similar problem and promised me to put my file on Mr Tulvings desk. I emailed Tulving on Feb 6, 2014 explaining my situation and the promise that the sales person made. No response. I emailed him again on Feb 11, 2014. Again no response. I talked to Karen again on Feb 14th (she said they don't ship on Fridays) but promised me again to place my file for Mr Tulvings consideration as he was the only one who can take any action. Now I was getting really nervous and scared. It was a lot of money for me and I had to get it for religious reasons. My only reason to buy from them was the promise of fast delivery. I talked with Karen again on Feb 20, 2014. She told me to check with her next day. Next day Friday Feb 21, 2014 I asked her if I was getting the shipment. She told me that I was not on the list. I told her that I need to leave for the event and I need the gold and she replied I can't get the gold today but "you have our blessings". Look at her nerves... I was appalled at their arrogance and deceitfulness.

That's when I did what I should have done 1 month ago. I searched online for Hannes Tulving and found the web full of complains against him. I nearly had a heart attack at the prospect of losing the gold and my money. I sent another email on Feb 24, 2014 to Tulving asking him to give me a concrete date of delivery. As usual no response. I looked online to see what other people have done and sent him another email on Feb 25, 2014 telling him that I am going to contact BBB, www.businessconsumeralliance.org and Orange County District Attorney, the California Division of Business Oversight. Still no response.

THIS PERSON IS A FRAUD... DO NOT TRUST HIM....HE WILL BURN IN HELL....

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 2 0

Reviewed by Pat Riot March 05, 2014

It may be over.....l.
From this page:
<http://about.ag/tulving.htm#UmXeVnaN5iU.email>

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

The Tulving Company is Out of Business

March 3, 2014 3:45PM EST

As we predicted/requested on Friday, The Tulving Company has gone out of business, as of Monday morning. They are no longer answering their phones, and we have confirmed that they have ceased operations. Many people are in denial about this; unfortunately, it is true. Their website won't be shut down until they think to do so or it expires. Their phones will after a certain number of rings go to the default "E-mail us to place an order" message. But there is no way to place an order, they are dismantling the company.

This page will be updated as more information comes in.

There is a lot of information on our old page about The Tulving Company.

We hope to update this page with information about what will happen next. At this point, our best guess is that The Tulving Company will file for bankruptcy. Unfortunately, we believe that there will be little in the way of available assets with which to compensate those whose orders were not fulfilled.

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 0 0

Reviewed by Ted Silverman February 28, 2014

#1 Reviewer - View all my reviews (4)

Major media is discussing Tulving fraud

This is an addendum to the information I presented back on July 4, 2013.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

The fraud that seems to occurring at The Tulving Company has not dissipated. More burned consumers are coming forward to complain and some are pursuing legal action against Tulving. There are so many complaints, in fact, that major media outlets are taking notice. On 24 Feb 2014, King World News ran a prominent story about Tulving and cited the company's poor record of non-delivery. Earlier on 10 Feb 2014, the Orange County Register published a story about a \$39,000 order for gold American Eagles that has not been delivered after four months. You can read the articles here:

http://kingworldnews.com/kingworldnews/KWN_DailyWeb/Entries/2014/2/24_Is_A_Popular_Precious_Metals_Deal

<http://www.ocregister.com/articles/coins-601179-tulving-gold.html>

One of the more shocking items in the Orange County Register story was this fact:

"South Dakota resident Kenneth W. Stach says the company has failed to deliver 240 gold coins to him, for which he paid more than \$318,000 in mid-November, despite multiple requests for the coins, court documents show."

In years past, infrequent buyers like myself gave Tulving the benefit of the doubt. There must be some mistake, I thought. My paperwork must have been misplaced for a time, I guessed. No more. The case for criminal activity at Tulving is very strong at this point. The fraud must literally run into the millions. This "dealer" is one of the Internet's premier con jobs and must be avoided at all costs if you value your money and your sanity.

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (0)

Was this review helpful to you? 3 0

Reviewed by John February 17, 2014

More of the same (horrible)

More of the same as below. Ordered 50 oz. silver on Nov.25, paid by wire the next day. Started inquiring about delivery mid-

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

December 2013. Been given false information and the runaround since then

Thanks to these reviews, have filed complaints with BBB, Cal. Attorney General, Orange County D.A. and Cal. Dept. of Business Oversight

Hope this is enough for Hannes to bust loose with my order. A local Cal. attorney is my next step.

Thanks to all who provided information on these reviews

Never again! Will pay slightly higher premium next time.

CUSTOMER'S EXPERIENCE

Did You Receive No

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (0)

Was this review helpful to you? 6 0

Reviewed by Daniel Yeo February 15, 2014

Tulving should be out of business, and he should be in jail.

I wired almost \$27,000 in July 2013 for 20 oz of gold coins. After going through months of frustration of not getting the shipment, I filed complaint on www.businessconsumeralliance.org.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

I got reply from Raychel Parris of BCA that she would work on this case, and I got my shipment today. Raychel is such a God-sent. At this point, the only way to get your gold or silver from Tulving is either filing complaint to BCA or hiring an attorney.

I cannot thank BCA and Raychel enough. BCA is simply the best service organization that I've EVER dealt with. Raychel was simply the best in her effectiveness and also keeping me informed via email along the process.

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (0)

Was this review helpful to you? 5 0

Reviewed by Lance February 14, 2014

Top 50 Reviewer - [View all my reviews \(1\)](#)

Avoid Tulving Company

I, like some of you, have never written a review of any company.

I have found the other reviews on this site to be very helpful as I have dealt with this company and would like to "pay it forward"

by leaving my review. I placed my order with Tulving in early December, 2013. I was told that my order would ship 8-10 days after they had received my funds. After about 2 weeks, I hadn't received my shipment. A friend had dealt with Tulving before and had recommended the company to me. After 2 weeks had passed and I hadn't received my shipment I decided to do a little research myself and came across this site. I was terrified by the reviews I read. Here's what I did: My comfort level with this company staying solvent long enough to receive my order was very low so I sold back at a small loss. Calling Karen is useless. She is merely a voice for you to speak to - nothing more. Hannes Tulving's email is on their site. He reads his emails. I contacted him directly through his email twice. The first time I sent a polite email requesting that they refund my money (as it had been over a month since I'd sold back my order and still no check). Tulving didn't respond to my first email, so I filed complaints with the Orange County District attorney, the California Division of Business Oversight (who licenses this company - Eric Brunkal is your contact person with them), and the Consumer Business Alliance. I gave it a couple more weeks and still no response from Tulving and no check so I sent him another email. This time I told him that I had filed complaints with the above agencies and that I was going to file another with the FBI that week. The next day I received an email from him stating that the check was in the mail. I have found the reviews on this site very helpful. A common theme among them is that those who take action by filing complaints with the above agencies or who hire attorney's get their orders or money back. Most of those who do nothing, don't get either. Its unfortunate that we should have to go to such measures but I believe that if you'd like to get your order or money back, you'll have to do the same. Best of luck to you all.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?

Would You Purchase No
From This Dealer
Again?

Comments (1)

Was this review helpful to you? 6 0

Reviewed by Cheryl February 12, 2014

Extremely bad experience

I have never written on any of these sites but feel I have to do so now We, like so many others have been scammed by Tulving I placed an order July 10, 2013 after talking to the salesman assuring me that what I wanted they did have and delivery

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

would be 3-5 days after receiving our money, via wire transfer. Received invoice receipt saying they received our money and would be receiving another email with the shipping information soon. Soon never came. Called Karen and was told it would be shipped the week of Aug. 10 which never came. Needless to say, after many calls and filing complaints with the FTC, Dept of Business Oversight, Ca district Attorney and the Orange Co. District Attorney we got nowhere. Was told that if enough people complain to the D.A., they would open an investigation but many complaints were already coming in!!! How many complaints were needed??? Finally in January of 2014, I had to hire an attorney who had to write two letters to Tulving to get my order. Tulving sent less than half the order after the first letter, probably as a (good will gesture) after 6 months. Then the rest of the order was sent after another letter. Finally got all our order Feb. 5 of 2014. This man needs to be put out of business for good. He is running a ponzi scheme and its about to break. My suggestion would be to everyone to collectively retain a criminal attorney and file a class action suit against this man. Everyone in his office knows exactly what is going on. They say what Tulving tells them to say. He either pays them well to stay on or none of them have any conscience left at all. I guess thats all I have to say about this. Hope you all get your orders or refund of money. Money is what they do not want to return.

CUSTOMER'S EXPERIENCE

Did You Receive Yes
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

Comments (1)

Was this review helpful to you? 4 0

Reviewed by Vlad February 06, 2014

No shipment on my bullion


I have been ordering bullion from Tulving since 2007 & they always shipped orders on time until recently I have ordered 20 gold maples from Tulving & wired \$24,593 back on December 30th 2013 and have not received my shipment. Called several times & was told to wait. No date of shipment is given to me by Karen, she gives me excuses that other people have been waiting longer than one month, their website says that they will ship right away, it shows that they have items that I have ordered in stock & will ship immediately as they receive the wire payment. Now when I call they are rude to me and just hang up on my calls. Any recommendations anyone?

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
 What You Ordered?
 Would You Purchase No
 From This Dealer

Again?

 Comments (3)

Was this review helpful to you?  5  0 

Reviewed by anthony February 05, 2014

How I escaped the sinking SS Tulving

I would like to start out with saying that I'm one that never writes on forums but after my experience with Tulving, I felt a need to explain my story in the hopes I can help other people who have been scammed like I have. I am relieved to say I finally received my order after much time and I am writing this to tell you all how I did it

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Back on October 1st, 2013, I purchased 1000 ounces of 1 ounce American eagle silver coins I wired them the money that day and they told me that the shipping time would be approximately three to four weeks. At the end of the month I called them and spoke to Karen inquiring why I have not received a shipment confirmation yet. She explained how they were very busy and to call back the next week. I decided to give them a little extra time and I called them back two weeks later I spoke to Karen again and I got the same story. She would tell me that she put my invoice on top of Hannes Tulving's desk and that it was solely up to him to determine which orders get shipped out I then called back at the beginning of December and in the middle of December. Karen was very apologetic and explained how she cannot do anything. All she could do was put my invoice on Tulving's desk I then inquired if I could just receive a refund in the same manner that they received my funds (wire transfer). She explained that the company does not allow refunds but that they could buy my silver from me and send me a check I refused this option for a number of reasons as I would lose money doing this (silver price decreased), I am not confident that their check would clear, and the amount of time it would take to receive the check would probably be great At this point, I then decided to look on the forums to see what other people had to say and what I found was terrifying. I realized that many people were experiencing the same issues I was facing and that a lot of people were stating that it was a Ponzi scheme that was unraveling. After reading this, I became very nervous and started questioning if the company will be able to survive for much longer As such, I decided to take action and do what many other people on the forums were saying. I filed a complaint with the orange county district attorney and more importantly, I hired a lawyer in the local area For anyone who doesn't have a lawyer or is looking for a good one who is down to earth, cares, and charges a fair rate, I used Chuck Marshall. I'll put his contact information down at the bottom for anyone who would be interested I contacted him on January 2, 2014 and I ended up receiving what I ordered by the end of January after waiting since October 1st, 2013. It became evident that Tulving only responds to letters from lawyers so I STRONGLY recommend getting a lawyer if you ever wish to see what you purchased. I hope my story helps anyone caught in this terrible mess.

Lawyer contact info that I used:

Chuck Marshall
 2121 N California Blvd , Suite 290
 Walnut Creek, CA 94596

P: (925) 575-7105 | F: (855) 575-7105
www.marshall-law-firm.com

Useful info/links

<http://articles.latimes.com/keyword/hannes-tulving> Shows Tulving declared chapter 7 bankruptcy in the past

<http://about.ag/tulving.htm#UmXeVnaN5iU.email> A valuable website explaining various helpful facts and information about Tulving on how they are violating their own rules, the FTC mail order rule, and the multitude of complaints the company has been receiving.

<http://golddealerreviews.com/reviews/gold-dealers/3-tulving> This site shows people experiencing the same issues as me and asserting how it could be a ponzi scheme

<http://www.tfmetsreport.com/forum/5076/tulving-warning> This site also shows issues people are having with the company and asserting the company is a scam

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase No
From This Dealer
Again?

 Comments (2)

Was this review helpful to you?  6  0 

Reviewed by jeff January 30, 2014

purchased from tulving

I placed an order with tulving and that was october 23. I was told that it would take 8 to 10 business days to ship overnight. after that time was up , I contacted tulving and was told that Fridays are not counted and no shipping can take place on Fridays. I was also told that they were behind in their shipping and that Karen was hoping that I would see it by the end of November. Well I did not receive the order till January 28th, 2014. I had started on the blogs of people that had spent hundreds of thousands of dollars and had not received their order. I had started to fear that I had been ripped off. I contacted the BBB and after 2 complaints , I received the order.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase No

From This Dealer Again?

Comments (1)

Was this review helpful to you? 3 0

Reviewed by Doug MacGregor January 28, 2014

STAY AWAY

I had bought multiple orders from Tulving in the past with no problems. However, I paid \$122,000 for metals in July and August of 2013. I have yet to receive delivery and when I asked. They won't give a delivery date and they won't refund my money. They have told me that they will buy it back.

My next call is to the district attorney.

CUSTOMER'S EXPERIENCE

Did You Receive What You Ordered? No
Would You Purchase From This Dealer Again? No

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Comments (1)

Was this review helpful to you? 3 0

Reviewed by Albert Belliston January 23, 2014

Do Not do business with The Tulving Company

I placed an order with The Tulving Company and wired over \$10,000 to their account. They promised delivery within 10 shipping days. That was November 18, 2013. They continue to make all kinds of excuses and promises but will not refund my money. These people are crooks. I would put zeros on the ratings above if I could.

CUSTOMER'S EXPERIENCE

Did You Receive What You Ordered? No
Would You Purchase From This Dealer Again? No

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Comments (0)

Was this review helpful to you? 5 0

Reviewed by Mark Sims January 21, 2014

Dishonest

Situation as of Jan. 21, '14: I have made a number of purchases from Tulving since 2008 and have not had any problems of any kind until this last one, placed Nov. 08, '13. I was told to expect the delivery in 8-9 days. I called a month later, talked to Karen, & got the runaround. I called again another month later, even worse. In anticipation of the response from Tulving that they didn't yet have the product, I went to the site before I called to see if they were still offering to sell the same product I had purchased. They were. When I called, Karen gave no information, no promises, no apologies. She refused both to return my money, or to give a date for the shipment of the order. Karen might as well have said, "Stick it in your ear." Other than the initial email confirming the payment (which I received immediately after the order), I have not received any communication from them at all. I would have recommended them until now, but I would rather give a warning to not deal with them.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 6 0

Reviewed by Kim January 21, 2014

Ordered in November - still no delivery

I ordered from Tulving in November scheduled for an early December delivery. I still have not received my order. Read the rest of the complaints. The story is the same for me. I hope the authorities take action soon.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 5 0

Reviewed by Jared January 17, 2014

I recommend them

I've dealt with them a few times. A couple buys and a couple sells. Each time went without a hitch. They have by far the best buy/sell prices, and I recommend them to anyone looking to deal in bulk.

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase Yes

From This Dealer

Again?

Overall rating	5.0
Shipping Time	5.0
Customer Service	5.0
Buying Experience	5.0

Comments (1)

Was this review helpful to you? 1 13

Reviewed by David January 13, 2014

Tulving

I have bought from Tulving for 15 years with no problems. 1st week of Nov 2013 I bought 500 oz of silver and it was at my door in 3 days. I bought 500 more the 2nd week of Nov and the problems began. Delays, promised dates and no silver. I filed complaints with the people below. I do not know what motivated Tulving to ship, but today Jan 13, 2013 the silver was delivered. I think this person was the motivating force (businessconsumeralliance.org). Strange situation why he shipped my silver in 3 days when others were owed metals for several months. From my point of view Tulving has always been arrogant, rude and in general a jerk. I put up with it because I got my orders in a timely manner and at a good price. However, dishonesty I tolerate only one time. I have found JM Bullion <http://www.jmbullion.com/> has better prices and much lower minimum purchases so I will try them next.

Try these people for help

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

<http://www.businessconsumeralliance.org/complaints/the-tulving-company-inc-13090180>

rparris@businessconsumeralliance.org

<http://www.facebook.com/businessconsumeralliance>

Better Business Bureau
 Serving San Diego and Imperial Counties
 4747 Viewridge Ave #200
 San Diego, CA 92123-1688
 Phone: 858-637-6199
 Fax: 858-496-2141

www.sandiego.bbb.org

info@sandiego.bbb.org

California Department of Business Oversight to the attention of Erik Brunkal, Senior Corporations Counsel. You can reach him at Erik.Brunkal@dbo.ca.gov or by phone at (916) 322-8782.

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (3)

Was this review helpful to you? 9 1

Reviewed by scott bruculere January 11, 2014

the tulving co

paid for my order 12 3 2013 talked to karen many times got run around on 19 2014 karen said that they would no longer talk to us they blocked our phone numbers scam scam scam scam

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (1)

Was this review helpful to you? 6 0

Reviewed by Heather Phelan January 09, 2014

Last updated: January 13, 2014

Same story

My parents bought a substantial amount of gold from this company in September 2012. It is January 2014 and still have not received their order.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 4 0

Reviewed by Houston Buyer January 07, 2014

Tulving order not received for 2 months now

I ordered gold coins from Tulving in early November. The sales person said 7-10 days for delivery. It's been two months now and still no sign of the gold. I have been calling Karen Brooks regularly, even filed a complaint with the BBB. Hannes responded to the BBB that he would ship by Dec 27th. Well that day has come and gone and he didn't ship.

I have been ordering from Hannes for 11 years and this is the first time he has pulled this. That doesn't make it excusable, especially not the lying and the lack of communication.

I wanted to see if other jilted buyers want to meet up and pay Hannes a visit. We all have their physical address from the wiring instructions. Email me at rpowl97 at gmail dot com if you want to organize joining me on a vacation to Newport Beach.

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 2 0

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Reviewed by Jerry Thompson January 02, 2014

SCAM

DO NOT BUY FROM TULVING...

We ordered 500 oz of silver in August and were told the shipping date would be 7-10 days. After 2 weeks we started calling and were given excuse after excuse and promise after promise.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

These guys are running a scam. They have you wire your funds then sit on them for as long as they can and take advantage of a decrease in price. It took a letter from our attorney and ** 4 MONTHS ** for us to get the original order. So they made money on the original purchase price and a decline of \$5 an ounce after 4 months.

BUY FROM SOMEONE ELSE!

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase No
From This Dealer
Again?

 Comments (1)

Was this review helpful to you?  7  0 

Reviewed by Andrew December 30, 2013

Purchased fromTulving on 7/15/13, wired the money that day. As of 12/30/13 still undelivered

Until today I have never left a negative review of a company. However, I am compelled for the sake of others who may purchase from this company to state the facts of my experience with The Tulving Company. On 7/15/13 I wired Tulving Company over 21,000 for an order that I placed over the phone for 1000 Silver ounces. As of 12/30/13 I still have not received the product nor have I been able to ascertain when they intend to fulfill said order. Since placing the order in July I have called 2 times in August, 3 times in September, and 4 times in October, and 3 times in December, in addition to emailing them. Each time Karen said that she could not tell me when my order would ship and the emails were never answered. I believe by the information provided on their website (http://tulving.com/New%20Pages/faq_frequently_asked_questions.htm) that they would ship the order within one month because they state, 1. "We always ship on a first paid, first shipped basis" and 2. they "only sell inventory that is within 30 days because we can not sell precious metals futures. Over 30 days, in our opinion, is selling a futures contract. We avoid that situation." Nevertheless, when i talked to Karen (who works customer service) in September she specifically stated that Tulving is no longer shipping orders in the order in which they are paid. Therefore I believe The Tulving Company is behaving fraudulently because they have failed to deliver products that were purchased over 5 months previously.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer

Again?

Comments (1)

Was this review helpful to you? 6 0

Reviewed by K Emden December 15, 2013

Avoid Tulving

I ordered one monster box of silver U.S. Eagle coins in late July of 2013. I telephoned Karen Brooks at Tulving several times. Finally, I filed a complaint with the Consumer Business Alliance.

The coins were finally shipped and I received them in Late November 2013. I won't deal with the company again and urge everyone to avoid them.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (1)

Was this review helpful to you? 8 0

Reviewed by Lynn December 14, 2013

Ponzi Coming Apart?

I have ordered many times over the years. Early 2013 I had an order take 6 weeks and I was starting to freak out, but the stuff finally came. I was getting pretty tough on Karen, the person you are referred to for checking on delivery.

New order 7 31 15 for 6 monster boxes. I asked specifically for an estimated delivery time and was told 10 days to two weeks. I wired the \$69k and waited. I started to call Karen about a month out. I asked the guy that answers the phone about delivery times as if I'm going to place a new order and he is still saying the same ten days to 2 weeks. Then I ask where mine is and he just says Karen is the one with the info and switches the call. Eventually he knew my voice and would just switch the call. I began to realize that Karen would sound like the sympathetic person but NEVER give information. "Well, I'll have to look into that." I'll put your invoice on Mr. Tulving's desk." "That should be going out very soon." I also came to realize that Karen is deathly afraid of Mr. Tulving.

I wrote a complaint to the California Secretary of State office. I got a reply a week or so later that suggested I go somewhere else, like the SEC. Typical bureaucratic government employees. I had explained that I was denied a product I had paid for and this had nothing to do with futures markets or exchanges. Pretty worthless people.

I had been defaulted on by another dealer in the past and had a contact at the FBI. (Look up Michael

Overall rating	1.7
Shipping Time	1.0
Customer Service	1.0
Buying Experience	3.0

Crowder and M&H Coin in Florida. He is going to prison or is already there.) I called and set up an appointment. On about 10/25/13 I finally couldn't take it anymore. The guy answering the phone was still quoting the same delivery time. I was spewing hatred at Karen the Worthless and demanded a sell. She switched me to Kevin? At the desk and I processed a sell order. He said it would take two days to process the check then it would be overnighted. I asked for the payment of the Non-Delivery premium and he got ticked. Why not? It had been 85 days at this point. He said that I had made \$4k on the trade and I should be happy. I replied that I would be happy if I ever saw any metal or money from them. I just wanted out.

I finally called Karen and told her that I had contacted the Attorney General's office and already had a reply (true but useless), and that I had a meeting set with the FBI. She seemed to be rolling her eyes til I told her that I had been recording her, the guy that answers the phone, and the guy who processed my sell order two weeks prior. She was furious and said that it was illegal. Maybe it was illegal in California but my attorney says it's legal in this state if one person knows it's happening. I gave her a reference for the guy going to prison that I mentioned above and that I was scheduled to meet with the FBI the following Tuesday. I would let the FBI decide what was legal. She finally hung up on me.

6 weeks later on 12/12/13 I got the email that my check had been sent. I got it yesterday and took it to my banker. Turns out that the bank Tulving uses and mine are owned by the same holding company. I had them verify the funds and deposit the check. My banker is going to raise the alarm internally.

Well, now I don't have a case against Tulving because they eventually made me whole, but if you have money or metal hanging out there I would call the FBI and have them investigate for wire fraud. These delivery timelines are getting extreme and will likely fail soon. RECORD EVERYTHING if it is legal in your jurisdiction. Pound on the Attorney General office. Good luck. I hope you can get out before it blows up.

CUSTOMER'S EXPERIENCE

Did You Receive No
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

Comments (0)

Was this review helpful to you? 13 0

Reviewed by Brian Ortman December 08, 2013

BUYER BEWARE Deceptive business Practices

I've had 6-8 successful orders over last 3 yrs with little problem or delay until now.

12Jul13: sent \$26,716.00 for 20 10z gold Eagles, Tulving received and deposited immediately. After many calls and false promises of delivery, and some "no idea why Mr Tulving has not shipped yours" I had them "buy back" my order in Mid November. Since gold had increased ~\$50/oz, I received a check in 10 days for \$26,650 and it cleared. If honest, due to the buy/sell difference of \$22/oz, I should have profited \$400. Instead I elected to take the small loss and get my money back rather than risking it. Cheap lesson. I am done with Tulving and highly recommend you do not do business with them.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 10 0

Reviewed by Keith December 05, 2013

5 months later and still haven't received my order

I ordered 20 ounces of gold bars back in July and it's not December and I still haven't received my order. I call and Karen just tells me everything is out of her hands, it's up to Mr Tulving and she doesn't know what he is doing. She doesn't know when orders will ship, Mr Tulving supposedly won't tell her and here I am without my order all these months later and still no answer. Since the price of gold has dropped since I made my order Mr. Tulving could simply buy at the current price and ship me my gold and make himself a handsome \$2000 This might be what he's doing. This company is very crooked and I'm hoping enough of us complain that the district attorney will put Tulving in prison for defrauding his customers

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 8 0

Reviewed by Jim Lindemann December 04, 2013

Tulving Company

Ordered 30, 1oz Gold Eagle Coins, July 23, 2013 Received invoiced marked paid, no delivery shown. Called next week, running behind will be 3 4 weeks before we can ship, per Karen Called at least 12 times over next 3 months, finally on October 24th, 3 months later, said they would buy the order back and mail me a check, I agreed as I felt I might never see the coins. I heard from another dealer familiar with Tulving that Hannes Tulving got in over his head on some speculation activity and was not paying his wholesalers and they were not sending him any metal I had sent complaints to the BBB, Ca dept of Business Oversight, FTC, Tx ATTY General, Ca ATTY Gen. and after 35

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

days of selling back to Tulving received a check. Dec 3rd. I feel the various departments had put some pressure on Tulving is why I finally got my money I feel Karen has a script to go by telling customers the same story. All lies. I would never do business with them again and encourage others not to.

CUSTOMER'S EXPERIENCE

Did You Receive No

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (1)

Was this review helpful to you? 8 0

Reviewed by Jim November 25, 2013

Tulving lawyer required to get shipment

Promised 3 - 4 day shipment, then two weeks. After a number of phone calls and emails from my broker and myself, we still could not get a shipping date. It took 3 months and action from a lawyer to finally get the order shipped. I will never buy from them again.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (1)

Was this review helpful to you? 8 0

Reviewed by Donald Palmer November 22, 2013

Top 50 Reviewer - [View all my reviews \(1\)](#)

Tulving Failed to delivery after 4 months

My experiences is similar to others. Purchased 40 oz. of Gold Coins first week of Aug. After 10 weeks of promises & no delivery I sold it back to them since they stated they had supply problems & recommended that solution. Now another 5 weeks has gone by & not received a check.....with multiple promises each week. Contacted Dean Haackenson Enforcement Officer For Calif. State Dept. of Business Oversight 3 weeks ago. Was assigned a case number. I've given the case number to Tulving in case a call comes to them so they know which account. At this point I'm nearing 4 months since Tulving took the

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

money & hasn't performed. I suggest others contact Dean. Maybe the license to sell in Calif. can be suspended until Tulving makes good to current outstanding customers Any suggestions, places to contact?

CUSTOMER'S EXPERIENCE

Did You Receive What You Ordered? No

Would You Purchase From This Dealer Again? No

Comments (1)

Was this review helpful to you? 5 0

Reviewed by Daniel November 21, 2013

Solution To Tulving Not delivering

This is for all who have been scammed by tulving. I have made several purchases over the years with no problems, except for the last one. I purchased some silver in Aug and had the same experiences as everyone else, no returned e-mails, dozens of calls to Karen, the standard "we don't know when it will ship" lines month after month. I filed with every agency under the sun and informed Hannes Tulving of what I was doing, still no delivery. They would always say "we'll buy it back from you" even though I never had it. I downloaded a form from the Orange County D.A.'s filed it out by hand (a consumer complaint form) and snail mailed it to the D.A. I got a call within a few days of sending it. She read the complaint and listened to my story and then hung up and called Tulving, she immediately called me back with the shipping tracking numbers from Karen, I got the silver the following morning. I urge anyone in this same boat to do the same, I asked the D.A.'s office if it was okay to spread the word and she said yes, just make sure to download the form and send it in. I also spoke with Eric Brunkal of the Ca. Div Of Business Oversight who was also very helpful. He informed me that the offer to buy back your pm's is "futures trading" which is illegal for them to do, due to the extended delay of delivery to the customers, so please don't sell back to them. Here is the form from the D.A.'s office, good luck. http://www.orangecountyda.com/docs/consumer_complaint_form__2_.pdf

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive What You Ordered? Yes

Would You Purchase From This Dealer Again? No

Comments (1)

Was this review helpful to you? 8 0

Reviewed by mike November 21, 2013

my experience was good
I've purchased from tulving twice. I was reluctant at first because I have heard such mixed reviews but he was vouched for by a fellow coin dealer whom I trust.

Overall rating	5.0
Shipping Time	5.0
Customer Service	5.0
Buying Experience	5.0

My most recent order for 500 rounds arrived today (11/21/13), and the order was placed on 11/13/13. It was a smooth transaction. There was even a mix up where they sent me the wrong tracking number and it said that my package was delivered to north carolina but it was resolved in a day.

As far as future business with tulving goes, I'm up in there air. I have been hearing not so great things about the current state of the company which is what prompted me to look up these reviews. It was disheartening to read all the 1 star negative reviews but at the same time a relief that my rounds arrived without a hitch. For me overall the experience was positive and i hope I don't bite my tongue in the future.

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase Yes
From This Dealer
Again?



Was this review helpful to you?

Reviewed by Disgusted November 20, 2013

Possible solution to your problems

Paid for 20 oz 10/1, called late October and got the same runaround from Karen, sent a nice email to Hannes and got no reply. Filed a complaint with BBB on Nov 1 which gave Tulving until the 19th to respond Then I contacted the CA DBO contact listed below and got a case number right back by email. On 11/16 I drafted an email to Hannes outlining all the agencies I planned to file with and also companies like Kitco and Casey Research that have listed them in ads or articles. On 11/19 (the last day), Hannes responded to the BBB complaint with "Shipping by end of week Thanks, Hannes", then I got the shipping notice and my order arrived today BBB seems to get their attention, and DBO may be rattling their cage, or promises of action on the buyer's part to take further actions may get the job done In the meantime, I will NEVER order from them again, it is just not worth the hassle or possible total loss of funds if this company goes down. It is too bad, their prices are good and delivery over the past two years was never a problem, but I am done with them Good luck to all looking for results.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase No

From This Dealer Again?

Comments (1)

Was this review helpful to you? 7 0

Reviewed by Bruce November 15, 2013

Top 50 Reviewer - [View all my reviews \(1\)](#)

Bad Experience

This order has taken over 4 months to finally get resolved. I placed this order back on 7/8/2013 and was told the product was in stock and would be shipped no later than the beginning of the following week. Then it was the beginning of the next month, maybe. This scenario deteriorated to my being told they didn't know when it would be shipped. Nothing changed until I filed complaints with four different agencies, as described in a prior post on this site, upon informing them as to what I had done I was immediately told my order was going out that day. I have done several deals with Tulving in the past and was quite happy with their service but after this last order never again will I do business with the Tulving Company.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (0)

Was this review helpful to you? 6 0

Reviewed by David October 23, 2013

Top 50 Reviewer - [View all my reviews \(1\)](#)

Tulving Deceptive Business Practices

Spoke directly to customer service who informed me that my order would ship 7 to 10 days after receipt of payment. After I received my receipt of payment from Tulving, I followed up with a phone call to Karen to inquire as to the expected ship date. She immediately told me she had no idea and that they were dealing with a high volume of orders. I told her what my promised ship date was at time of order and she essentially laughed at me. Tulving now has my money and it's clear they believe they can do whatever they want. Karen informed me that I would be lucky to see my shipment in several weeks. They tell you anything to get your money then they change rules. Had they been upfront and honest about their lead times, I never would have placed the order.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 10 0

Reviewed by Judy Vanderwood October 22, 2013

[Top 50 Reviewer](#) - [View all my reviews \(1\)](#)

12 Weeks and Still Waiting

It's been 12 weeks since we placed our July 26 order. Our experience with Tulving mirrors those posted to this blog. They are playing a stalling game with customers, while whatever the real problem is is likely getting worse. Our attorney has sent a letter to Tulving demanding performance and after reading David's post, we too have filed complaints with the CA State Attorney General and CA State Department of Business Oversight. We hope to get our order but it doesn't appear very promising. I hope these posts will be viewed by all others who are thinking of dealing with Tulving. What a nightmare!

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (1)

Was this review helpful to you? 8 0

Reviewed by David October 17, 2013

[Top 10 Reviewer](#) [View all my reviews \(2\)](#)

More information on The Tulving Company

Here are some additional facts that you should be aware of regarding the Tulving Company.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

In the 90's, Hannes Tulving's company was named Rare Coin Investment. The Federal Trade Commission (FTC) determined that he defrauded customers by over \$40 MILLION DOLLARS He was heavily fined and put out of business. Tulving was operating a PONZI scheme which is essentially what he is doing now. See http://articles.latimes.com/keyword/tulving_hannes

Hannes Tulving later reopened as The Tulving Company and has been sued numerous times for Breach of

Contract and Fraud in the California Civil Courts apparently related to his illegal business activities. Tulving has since 'laid low' until the authorities lost interest. Over the past year or so he has returned to his illegal activities once again. He fits the old adage, "Once a Crook, Always a Crook". How much money has he defrauded customers out of now?

The Tulving Company is engaged in unethical, deceitful arbitrage and what amounts to a ponzi operation. Hannes Tulving relies on the fact that bullion prices fluctuate. A customer sends their money to Tulving to purchase gold or silver bullion at the current market price. Tulving tells the customer over the phone and web site that it will ship immediately overnight. Tulving then waits MONTHS for fluctuating prices to decrease substantially so he can obtain the lowest price from his supplier. Only when Tulving has guaranteed himself an extra large profit does he then fulfill the customer's order.

Tulving only accelerates the order fulfillment process when a complaint is made to the Better Business Bureau, the CA Attorney General, the CA Division of Business Oversight, or the Federal Trade Commission.

Tulving's activity is illegal since he leads customers to believe via his web site and by verbal agreement over the phone that orders will be shipped almost immediately overnight. **That is outright deception and false advertising ** TULVING IS RUNNING A SCAM! AT NO TIME DO CUSTOMERS AGREE TO LET TULVING COMPANY HOLD THEIR MONEY FOR 2-4 MONTHS SO TULVING CAN GAIN EXTRA PROFIT. It is time for The Tulving Company to be put out of business permanently.

CUSTOMER EXPERIENCE

Did You Receive What You Ordered? Yes
Would You Purchase From This Dealer Again? No

Comments (0)

Was this review helpful to you? 10 0

Reviewed by David October 14, 2013
Top 10 Reviewer - [View all my reviews \(2\)](#)

My battle with The Tulving Company

Ordered mid-August. Told 10-14 days to ship as they were behind. After 2weeks, I called. Told would ship in 2weeks. After 4weeks total, I called. Told would ship in 2 weeks. After 6 weeks total, I called. Told would ship not before 2or3weeks. Told Karen this looked very suspicious. She recommended that I sell my order back to them at a loss (~\$700) if I needed my money back. I suggested that since I have received NOTHING from them, they should cancel the order and return ALL my money. She refused to return my money. I suggested this was looking like a scam. She hung-up. My polite emails to Tulving have all gone unanswered. I am exasperated with this deceptive, untrustworthy company.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

I called beginning of October to 'test' them. I inquired about placing an order of 2013 silver Maples. I was told yes, we have them in stock and will ship in 10 14 days I asked how can that be since my order placed 7weeks ago has still not shipped. The order guy said he just tells customers what he is TOLD to say and has no idea what actual shipping times are They are all LIARS

I contacted the Better Business Bureau, the CA State Attorney General, and the CA State Department of Business Oversight who licenses Tulving. I filed a complaint with each and both AG and DBO (dean haakenson@dbo.ca.gov) have contacted me personally I urge all others to do the same If enough complaints are received by DBO, they will definitely open an investigation. The AG also informed me that if enough persons complain about Tulving, they will open an investigation I suspect DBO has quicker, responsive power since they can immediately suspend Tulving's license if they feel an investigation is warranted

None of us have any guarantee of getting our money back If the state takes legal action against Tulving, they can also freeze his accounts (our money) to protect it if he hasn't hidden it out of country. This may send a warning signal off in your brain, but if you are in the state's 'que' to be recompensated, then you have a much better chance of getting your money back than the sucker who is afraid to speak up and file anything official Look, if the NSA, FBI, or related wants to know what you got, they will find out whether you file against Tulving or not. As for me, I am in the que to get my money back. The sooner he is shut down, the better for the public and the reputable bullion dealers

UPDATE Before submitting this, I called Tulving again (mid October) Apparently somebody (BBB, AG, or DBO) scared him into action. Karen told me that my order would go out immediately. Great! But:

- A) I am still pursuing my complaints,
- B) I will believe it when I am holding my order is in my hands,
- C) Will my order be what I specified? That remains to be seen.

IF I get my order this week, it will be going on 9weeks since I ordered. I do hope that I have no unpleasant surprises Don't do business with Tulving If you have, file complaints ASAP and hope you get your order or get in que to get your money back before Tulving is shut down. Good luck.

CUSTOMER'S EXPERIENCE

Did You Receive No
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

Comments (0)

Was this review helpful to you? 18 0

Reviewed by Ann Randall October 08, 2013
 Top 50 Reviewer - [View all my reviews \(1\)](#)

Overall rating 1.0

Gold = Trust. Tulving = Untrustworthy.

So many of the reasons we own gold have to do with TRUST. Trust (or lack thereof) in fiat currencies, central banks, etc. So we all want a trustworthy partner when we purchase bullion.

Tulving WAS such a partner; they have become something else entirely. I am a very good customer: multiple purchases a year over the past seven years. My last two purchases from Tulving have been so horrible that I have now selected a new bullion vendor.

My experience is the same as others: placing orders are a breeze, receiving orders is a battle. Two months, three months ... who knows when you'll get your bullion. Nobody knows what is going on. If their shipping backlog is really this long, you can afford to hire another person in shipping. Are they playing arbitrage games? Do they care at all about their customers? Apparently not.

Yes, their prices are good. What is three months of your angst worth? And what if something happens to the company during your two to three month wait? You'll be screwed ... and kicking yourself for saving a few dollars.

After so many years of good service, it pains me to say this: I urge everyone to take their business elsewhere. Tulving is a disaster.

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Comments (0)

Was this review helpful to you? 11 0

Reviewed by Lance Murrah October 03, 2013

[Top 50 Reviewer](#) [View all my reviews \(1\)](#)

I am done with Tulving

Had decent customer service until last order Just received it today (October 3rd) after over a 3 MONTH wait. Never again.

They have mastered the fine art of content free speech concerning shipment dates. I still remember the one about the 4th of July holiday delaying my shipment a week The prices are good, but certainly not worth worrying about the safety of your money Don't know what game they are playing, but I'm done with them.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?

Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 8 0

Reviewed by jim September 08, 2013
[Top 50 Reviewer](#) - [View all my reviews \(1\)](#)

Don't know whats happening with Tulving

I wired funds for gold products that was listed as available on their website. Received an invoice on 8/15/13 by email stating that they received the funds Still haven't received it after 3 weeks. I've dealt with Tulving many times before, last time in late 2012. And each time they were always quick to ship taking only a few business days at the most So now this is totally unexpected and got me worried as I don't know what's going on with them. Called Karen couple of times and each time they only states that they're running behind and cannot give a firm date when they might ship I think what they're doing is not right as at least the customer needs to be informed before purchase that he should expect a significant delay in shipment They need to change their website to give notice that they customer won't receive their product within 5 business days as before. If I do not receive my product by next week I will be forced to go to law enforcement agency for help

Overall rating	1.3
Shipping Time	1.0
Customer Service	1.0
Buying Experience	2.0

CUSTOMER EXPERIENCE

Did You Receive No
What You Ordered?

Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 10 0

Reviewed by Bill September 04, 2013
[Top 10 Reviewer](#) - [View all my reviews \(2\)](#)

Tulving in hiding?

Bill Finley have given up on Tulving. I sent a wire and they "had the silver in stock". I kept calling Karen and got no where. After 5 weeks I was getting concerned. The last time I ordered was a year ago. Karen said they had a shipping date and then cancelled it. She said Hannes comes in each day and decides what will be shipped. She had no idea when it would go out. I sent an email and had no response. I asked to talk to Hannes and they said he doesn't talk to customers during the day, they are not open at night anymore. So I just sold it back to them and spot plus 10 cents, after paying 99 cents over spot. I hope I get the check soon. The prices are not worth the risk.

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 8 0

Reviewed by Bill August 30, 2013

[Top 10 Reviewer](#) [View all my reviews \(2\)](#)

Tulving-mia

I threw in the towel on Tulving today I had done a few transactions with him that went well, although my previous order was late, but I had sent a check I wired funds and have been waiting as we enter week 6. I had the same experience as the recent posters. Hannes won't answer the phone, or respond to an email Karen, works part days, so you have to call when she is around She finally says that they only have so much insurance coverage per day. They dropped shipping dates and now he comes in the morning and decides what will be shipped My silver had a scheduled shipping date and then was canceled, no more shipping dates. She has no idea when my order would be sent, and tells me that others have been waiting I became concerned and saw this thread and decided to sell back to them, without ever receiving the silver. Its a great gig, they sell at 99 cents over spot and buy back at 10 cents over spot. I suggested they buy it back at the same spread since they won't deliver I just hope my check arrives and clears. Next step is to file a complaint with the State of California. I would not take the risk from ordering from him Never seen anything like this in my life, so hope everyone gets their merchandise or their money

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (0)

Was this review helpful to you? 4 0

Reviewed by Mark Roman August 26, 2013

[Top 50 Reviewer](#) [View all my reviews \(1\)](#)

Likely won't buy from Tulving again

I wired funds, and they were received in early July by Tulving
Significant purchase for me, after about a half dozen prior

Overall rating	1.3
Shipping Time	1.0
Customer Service	1.0
Buying Experience	2.0

purchases with Tulving. I've phoned and spoke with Karen, and gotten the same run around as other reviewers here Emailed Hannes himself, and he has stopped responding This is concerning because prices were quite low, and now they are \$200 higher for gold, and even higher percentage increase for silver. So did he get caught not having the gold, and then later hoping he'd procure it cheaper ? Its really the lack of response and vague answers that are troublesome to me, but the delay is making me wonder if I'll ever receive my bullion Hate to irritate the guy bc he sort of acts like the soup Nazi from the Seinfeld episode's where if you piss him off, he puts you at the back of the line again. This likely the last time I'll do business with Tulving, and regrettably I had told someone else who was asking where I purchased I'm considering going back to that person and saying, its not worth the worry or hassle to save a few bucks on the premiums.

CUSTOMER'S EXPERIENCE

Did You Receive No
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

Comments (3)

Was this review helpful to you? 10 0

Reviewed by MikeCP August 19, 2013

[Top 50 Reviewer](#) - [View all my reviews \(1\)](#)

Several Complaints on Lemetropolecafe forum

I subscribe to Lemetropolecafe and have seen complaints regarding Tulving. This type of thing is unusual b/c dealers are never really discussed. Take note and consider dealing elsewhere.

CUSTOMER'S EXPERIENCE

Did You Receive Yes
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

Comments (0)

Was this review helpful to you? 9 0

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

Reviewed by Jim Smith August 19, 2013

[Top 50 Reviewer](#) - [View all my reviews \(1\)](#)

Have done business with tulving many times. NEVER AGAIN!

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

I too have been a customer of Tulving for years, having bought, sold and traded everything from my first bags of junk silver to 10 oz and 100 oz silver bars to 50 pesos, etc Last year I noticed the time it took to turn around a trade kept increasing from a week or so to multiple weeks

In early May an order was placed with Tulving over the phone for the purchase of one 1000 oz silver bar. Funds were wired to Tulving that day and successfully arrived the following day Five weeks later I inquired with Karen at Tulving about the status of my order and was told that Tulving was experiencing "some delays" with some of the products I was asked if I was interested in choosing a different product, which I did My order was changed from one 1000 oz silver bar to rounds at the cost of an additional \$300. A personal check for \$300 was immediately sent to Tulving and my records show it was immediately deposited I was told by the salesman that the new product would be shipping the week of 06/24/13.

I inquired again about the status of my order the week of 07/08/13 and was told it should be shipping around the end of the week. I inquired again the week of 07/22/13 and Karen reported that my order would be shipping shortly I followed up on 07/29/13 and was treated very rudely by Karen and told not to call on Mondays and that she did not have an order status for me. I proceeded to e-mail Mr. Hannes Tulving that day (07/29/13) and his response via e mail was "Plan on shipping this week"

On 08/06/13 I followed up with Mr. Tulving with the question, "Has this shipped out?" to which Mr. Tulving replied, "Not yet" My response was, "What is holding it up? This Thursday is 3 months I'm a patient man but at some point I will have to say "enough"." to which I never received a response from Mr. Tulving.

I then filed a complaint with the BBB and let Mr Tulving know that if he failed to respond in a timely manner I would be contacting my local law enforcement and his local law enforcement. The next day (Friday) I recieved a shipping confirmation from Tulving and my order arrived today (Monday)

My order took 104 days to arrive and at no time did Tulving provide me with any kind of legitimate status of where things stood

I no longer care what Tulving's posted prices are, I am not risking my dollars and am done being treated like the doormat on the way in to the farm house at a cattle ranch I have no idea what kind of foolishness is going on behind the scenes at Tulving but I'm not going to stick around and find out.

CUSTOMER EXPERIENCE

Did You Receive Yes

What You Ordered?

Would You Purchase No

From This Dealer

Again?

Comments (0)

Was this review helpful to you? 10 0

Reviewed by Mike August 13, 2013
Last updated: August 31, 2013
Top 100 Reviewer - [View all my reviews \(1\)](#)

Tulving Is the Worst

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

I cannot understand how Tulving stays in business. Everything they have promised me has been a lie I made a five figure purchase and wired funds to Tulving on June 20, 2013. His web-site says that orders are shipped within 3-5 days of receipt of funds. This is a joke. At the time of I placed the order the salesman said they were running a bit behind and my order would ship in 1 1 1/2 weeks. When two weeks had passed I called and was told my order was in the queue and would ship the week of July 22 When it failed to show up I called again and was told it was no longer in the queue and they couldn't tell me when it would ship. I asked to speak to Tulving and was told he did not take calls during business hours! He responded to one email and said he 'would TRY and ship my order the following week ' As of this posting (August 14, 2013), almost nine weeks after I wired the funds, I have still not received my order and Tulving has stopped responding to my emails

This was my fifth and last order with Tulving. I am treated like a nuisance and with complete contempt. I suppose he thinks he can treat his customers like trash because, in my case, I am two thousand miles from Newport Beach.

I am in the process of hiring an attorney in the hopes of recovering my money I am not a first time buyer; I have traded PM's for years and understand the volatile nature of this market, but Tulving is the worst.

UPDATE August 21- It took nine weeks and a lawyer, but my order was finally delivered. My attorney had to send a letter before Tulving decided to ship They do have competitive pricing, but when you factor in legal fees it's hardly a bargain. I will not do business with them again.

CUSTOMER'S EXPERIENCE

Did You Receive No
 What You Ordered?
 Would You Purchase No
 From This Dealer
 Again?

 Comments (1)

Was this review helpful to you?  7  0 

Reviewed by Ryan Anderson July 19, 2013
 Top 500 Reviewer - [View all my reviews \(1\)](#)

Slow but Sure

I have done business with Hannes for 6 years. I have always received what I have ordered and it usually has been 7-10 days. My latest order of Silver Eagles took 5+ weeks. I called Karen 3 times and was basically told "we are behind." Finally, I sent a nice email to Hannes requesting my silver to be shipped. He shipped it the next day by overnight red delivery.

Overall rating	3.0
Shipping Time	1.0
Customer Service	3.0
Buying Experience	5.0

I will use him in the future as I do trust him to deliver. He does nearly a billion a year in sales with a skeleton crew, so I understand. If the wait is not something you can handle it is best to shop somewhere else; otherwise, I feel that his prices are good enough to wait as my silver is not for sale anywhere near the prices it is at today.

CUSTOMER'S EXPERIENCE

Did You Receive Yes
What You Ordered?
Would You Purchase Yes
From This Dealer
Again?

Comments (1)

Was this review helpful to you? 1 17

Reviewed by Tony July 05, 2013

[Top 50 Reviewer](#) [View all my reviews \(1\)](#)

DON'T MAKE THE MISTAKE OF DEALING WITH THEM!!!

My local dealer said delivery was over 4 weeks out Tulving said they had it in stock & delivery would be in about 7 Days. They LIED!!! Its been about a month & still nothing They are VERY, VERY RUDE & JUST DON'T CARE!!! I am going to see an Attorney next week if I do not get delivery. My Local Dealer was Honest with me I WILL NEVER TRUST TULVING AGAIN!!!

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

CUSTOMER'S EXPERIENCE

Did You Receive No
What You Ordered?
Would You Purchase No
From This Dealer
Again?

Comments (1)

Was this review helpful to you? 15 0

Reviewed by Joseph June 27, 2013

[Top 50 Reviewer](#) [View all my reviews \(1\)](#)

Lost my business

This was my fourth purchase from Tulving While shipping times were within a couple weeks before, this time my order took over three weeks to arrive Several calls to Karen ultimately resulted in essentially a pass. "I just do what Mr. Tulving tells me..." No update, no idea when things will ship, etc I emailed Mr Tulving twice and got a response the second time

Overall rating	1.0
Shipping Time	1.0
Customer Service	1.0
Buying Experience	1.0

While my story isn't as bad as the others you will read here, I've decided that I won't do business with them again. The website saying that all orders are in stock and are shipped overnight is misleading at best. Having to wait 3+ weeks for any real status on my order with them holding my money and feeling like I have virtually no recourse is not the way I ever want to do business again. The other posts in this website were

also very "helpful" in convincing me that I don't want to do business with them again. FYI - I'm using an alias for this review but the other information is factual

CUSTOMER EXPERIENCE

Did You Receive What You Ordered? Yes

Would You Purchase From This Dealer Again? No

Comments (0)

Was this review helpful to you? 16 0

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Tulving

1.8 (125)

The Tulving Company has been buying and selling bullion online since 1995. They are...

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Business

Gold-coin investors feel shined on by Newport firm

A military vet is one of hundreds waiting on coins ordered from The Tulving Co. in Newport Beach.

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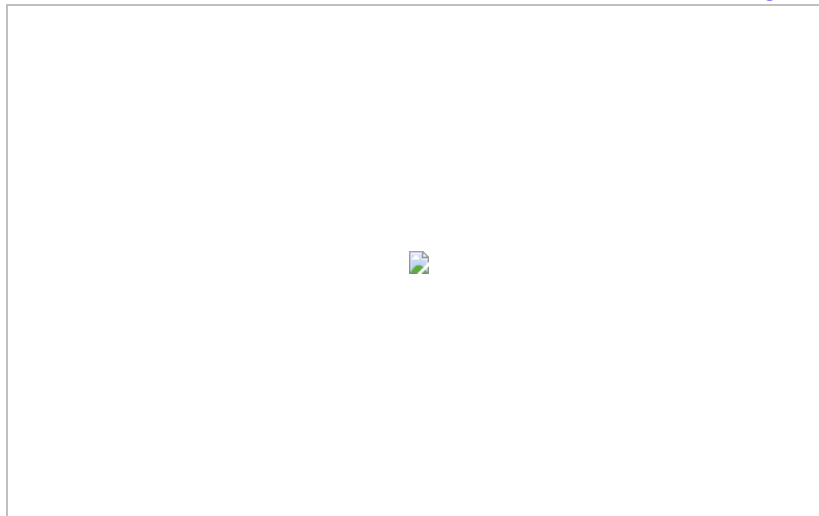
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Pitcher Throws Perfect Game on Same Night Brother Does Play-by-Pla



Video: Neil Dwyer/LITV
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A flood of customers across the nation have complained about late or missing shipment orders of gold coins promised by Newport Beach-based retailer Tulving Company.

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Golden tips

Do:

- Shop around. You're not limited to just one independent coin dealer.
- Consider a mutual fund or exchange-traded fund, which holds precious metals on the consumer's behalf, said Greg McBride, senior financial analyst at Bankrate. This way, taking possession and having to find potential buyers later on are both unnecessary.
- Know that most banks sell gold bullion. Their markups are usually lower than dealers'.
- Consider all fees involved – such as possible insurance and a safe-deposit box – if you're considering buying rare coins.
- File any complaints with the California Department of Business Oversight at dbo.ca.gov/Consumers/consumer_services.asp

Don't:

- Buy into claims that written risk disclosures are not needed. Get everything in writing.
- Feel rushed into buying coin investments. High-pressure sale tactics can be a warning sign.
- Forget to search the Internet for any mentions of the company or dealer from which you're buying.
- Forget to talk to your financial adviser and other investors before making a purchase. Also, talk to an appraiser to assess the value of the coins you are considering purchasing.

Source: Federal Trade Commission, Bankrate

Military veteran Dean Marzano – leery of stock and bond investments – decided in mid-October to sink \$39,000 of his savings in gold.

He settled on 30 ounces of American Eagle coins from The Tulving Co. in Newport Beach, which promised the shipment would arrive within seven days. Nearly four months have passed, and the San Diego resident says his order is still nowhere in sight.

"I'm running out of options," he said. "I got ahold of the shipping lady, and she says 'I don't know what to tell you. Every day, I put in the orders and the owner chooses who he wants to send purchases to. I don't know what else to tell you.'"

Marzano, 40, is not alone. Consumers across the country have reported late or missing shipments of rare silver and gold coins purchased from the Orange County precious-metals dealer. Clients say they have lost tens of thousands of dollars in investments, prompting some to take the company to court.

The Better Business Bureau has fielded more than 150 complaints since June regarding The Tulving Co. The owner, Hannes Tulving Jr., had a run-in with the federal government in the early 1990s over another coin operation. At the time, he ran one of the largest retail coin firms in the country.

Tulving did not respond to multiple email and phone requests for an interview.

Complaints have mainly involved "delay after delay" of promised coin deliveries and customer service, said Sheryl Reichert, chief executive of the BBB in San Diego, Orange and Imperial counties.

The BBB says it has closed several cases since June against Tulving's latest company, but it appears the coin dealer has grown increasingly unresponsive to the group's communications, Reichert said.

"In our minds, if they ignore the BBB or ... there's a failure to communicate (with us,) then there's probably a failure to communicate with the public," she added.

This is not the first time Tulving's owner has been scrutinized for his dealings with precious-metal coins. The Federal Trade Commission accused him in 1990 of overpricing rare coins and renegeing on return guarantees through a similarly named company, Hannes Tulving Rare Coin Investments, which also was headquartered in Newport Beach.

Investigators called the operation "a sophisticated scheme to defraud customers" out of more than \$40 million, according to the civil complaint.

The company sold collectible coins for three to five times their true worth and told customers their coin values were rising when they weren't, thus creating an "artificial market," government records say.

After the company was placed into receivership and filed for bankruptcy, Tulving agreed to pay \$1.3 million in a settlement in 1992. It's unclear from FTC documents whether Tulving completed his payments.

Now 20 years later, customer complaints against Tulving have begun again. At least two customers, one in Arizona and another in South Dakota, have filed lawsuits:

- South Dakota resident Kenneth W. Stach says the company has failed to deliver 240 gold coins to him, for which he paid more than \$318,000 in mid-November, despite multiple requests for the coins, court documents show.
- Alfred J. Olsen, of Phoenix, says his \$107,000 order of 80 Gold Maple Leaf coins was supposed to be shipped within a week of ordering them in October, based on a lawsuit filed in U.S. District Court in Arizona. When the suit was filed in the fall, Olson had yet to receive the coins.

Neither plaintiff's attorney could be reached for comment.

Historically, interest in precious-metal coin investments tends to rise as people feel more uncertain about the economy.

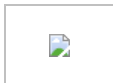
More than 5,600 customers have made inquiries into The Tulving Co. with the Better Business Bureau since 2010, which marked the beginning of the recovery from the Great Recession – and the start of the run-up of gold prices.

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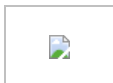
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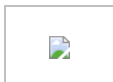
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David Silva Top Commenter Santa Barbara, California

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Tuesday, March 4: Today in Gold and Silver

BY [Casey Research](#) | 03/04/14 - 05:21 AM EST

[Find out if \(GLD\) is in Cramer's Portfolio.](#)

NEW YORK ([TheStreet](#)) -- The gold price was up sharply at the 6 p.m. open on Sunday evening in New York, but the sellers of last resorts were also there as well. Volume was immense, so the long buyers had no trouble finding a willing short seller to take the other side of the trade. By the London open, volume was almost 50,000 contracts---a monstrous number. The gold price hit its high 15 minutes after London closed for the day---and the gold price got sold down a bit going into the 5:15 p.m. electronic close.

The CME Group recorded the low and high ticks as \$1,330.70 and \$1,355.00 in the April contract.

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Gold close in New York yesterday at \$1,350.30 spot, up \$21.70 from Friday's close. Net volume was around 147,000 contracts---and as I mentioned in the first paragraph, more than a third of that came before the London open.

Jim Cramer and Stephanie Link actively manage a real portfolio and reveal their money management tactics while giving advanced notice before every trade.

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Silver was kept on a pretty short leash on Monday. Every time it rallied above the \$21.40 spot mark, there were not-for-profit sellers waiting to sell it back down to that price level again. This happened in Far East trading---and in London and New York as well.

[TheStreet Quant Ratings](#)

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The low and high ticks were recorded as \$21.26 and \$21.74 in the May contract.

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Silver finished the day on Monday at \$21.405 spot, up 18 cents from Friday. Net volume was very decent at 48,000 contracts---and a third of that amount was done before the London open as well.

Access the tool that **DOMINATES** the Russell 2000 and the S&P 500.

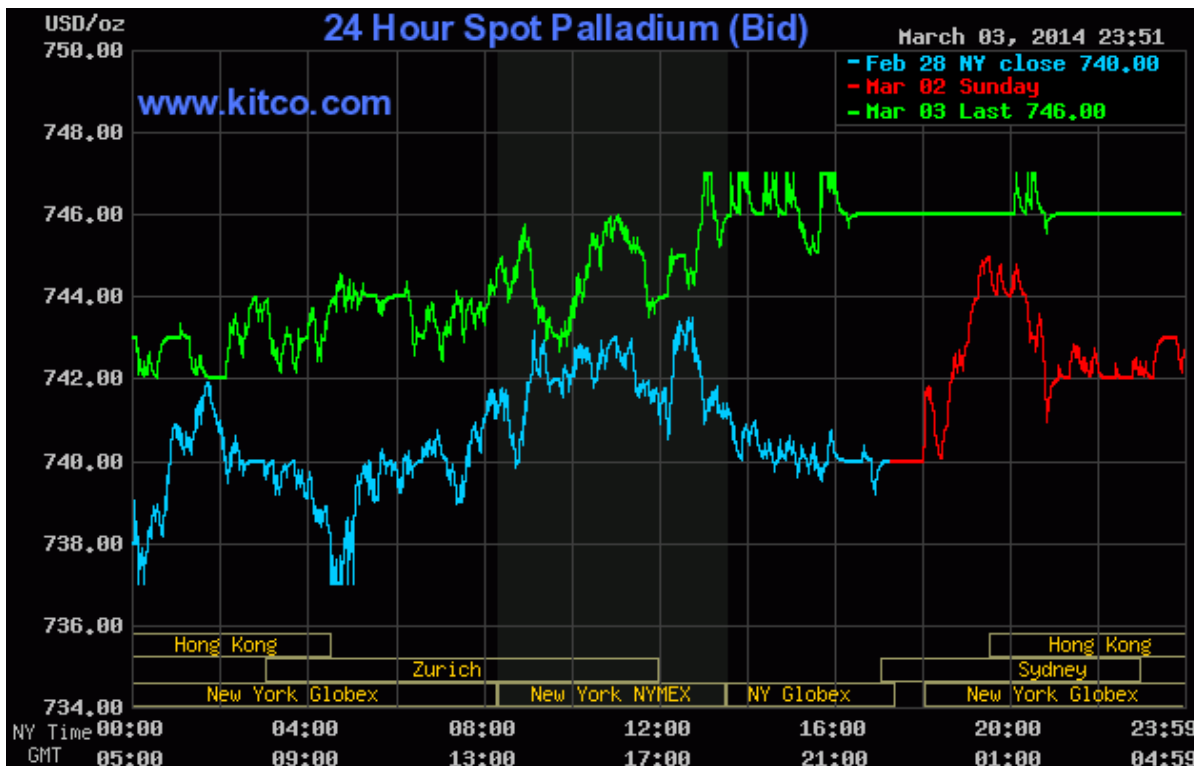
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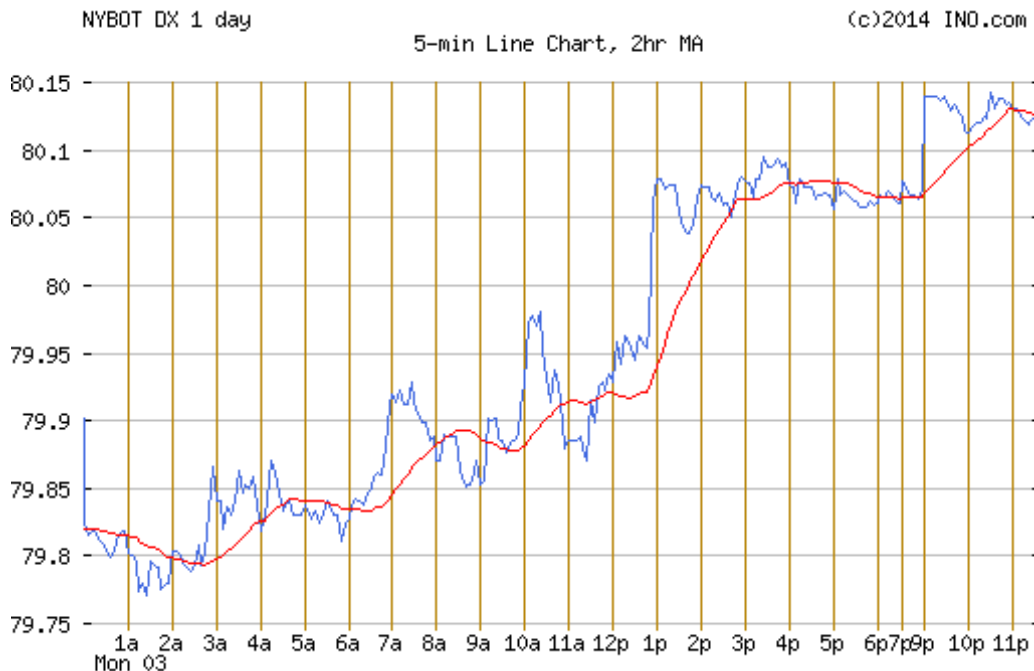


Platinum and palladium prices didn't do much, or weren't allowed to do much---and the decision as to which scenario it was, is up to you. Here are the charts.





The dollar index closed in New York on Friday afternoon at 79.78---and then didn't do much after it opened in Far East trading on their Monday morning. then about 3 p.m. Hong Kong time a rally began that took the index up to the 79.95 level shortly before 1 p.m. EST. From that point it popped up to 80.08 in just a few minutes---and traded pretty flat into the close. The index finished the Monday trading session at 80.06---up 28 basis points on the day.



The gold stocks gapped up over 3% at the open---and hit their high at 11 a.m. EST, which was shortly before the high tick of the day in gold. After that, the HUI got sold down for the remainder of the New York trading session---and the HUI finished up only 1.71%. Not a great gain, but certainly better than the

general equity markets.

NYSE ARCA GOLD BUGS INDEX



The silver equities gapped up as well--and were up not quite 3 percent by 11 a.m. EST right on the button. But with the continued selling pressure in the underlying metal, the shares gave up almost all of their gains by day's end, as Nick Laird's Intraday Silver sentiment index only closed up 0.66%.

Intraday Silver 7 Index



The CME's Daily Delivery Report for Day 3 of the March delivery month showed that zero gold and only 28 silver contracts were posted for delivery within the Comex-approved depositories on Wednesday. JPMorgan was the biggest long/stopper scooping up 25 of those contracts for its in-house [proprietary] trading account. The link to yesterday's Issuers and Stoppers Report is [here](#).

There were no reported changes in [GLD](#) yesterday---but surprisingly enough, there was a withdrawal from [SLV](#), as an authorized participant took out 1,154,100 troy ounces and shipped it off to parts unknown. Based on the current price action, silver should be pouring into [SLV](#), not going in the other direction---but maybe the silver was more desperately needed elsewhere. Or maybe silver was being withdrawn by a large holder of [SLV](#) that didn't want to go over the public reporting limit, a pet theory of Ted Butler's---and one I can find no fault with.

There was a sales report from the U.S. Mint yesterday. They sold 1,500 one-ounce 24K gold buffaloes---and 599,000 silver eagles.

There was a decent amount of gold moved in and out of the Comex-approved depositories on Friday. There were 30,037 troy ounces reported received---and 74,492 ounces shipped out. The link to that activity is [here](#).

There was more activity in silver, of course. They didn't report receiving any on Friday, but did ship 802,063 troy ounces out the door. The link to that action is [here](#).

I had an e-mail from Joshua Gibbons yesterday---and it was all about Tulving. This is what he had to say: "The Tulving Company has ceased operations as of this morning. They are no longer answering the phones, and I have heard from a reliable source that employees have been told to go home." Here's the [link](#) to Joshua's webpage on Tulving Company---and he has more to say there.

I had an interesting e-mail exchange with "Tim from China" who lives in a "tier 4 city outside of Chongqing"---and this, in part, is what he had to say:

Hi Ed,

I recall last month you included a link to some photos of some gold shops in China showing people falling over themselves to buy.

Being that I am on the ground, I thought I would send you a pic I snapped at 11 a.m. today (Sunday) at one of the 6 gold shops in the town in live in here that services a population of a million locals. I would say Sunday is the biggest shopping day for many Chinese---and at neighbouring stores selling clothes, groceries and white goods there were LOTS of customers.

I lingered over the road at a Taiwanese style bakery that also sells coffee for about half an hour before I took the shot---and I can tell you they did not receive a single customer. The other two gold shops I walked past were fully staffed but devoid of any customers as well.

Your readers might like to see the other side of the gold coin in China!

I'm going to send you some more photos when I go out this afternoon, I'll get the jewellery up close. The entire left wall and rear counter is 24K jewellery, with a few decorative bars thrown in. The central station is all silver. You can only buy 24K, they don't have any concept of 9 or 18 or 22 like Western consumers.

Unfortunately they impose a tax that I believe is 9% of all gold, jewellery, and bullion from the banks on the mainland. Hong Kong however does not have that tax, so it remains the best place to buy virtually at spot price from any bank there. In-the-know Chinese get gold from there....

OK Ed, here is some Chinese eye candy for you. All items carry weight in grams, today's price is 290 RMB per gram and the shop adds 10 RMB per gram for the "workmanship---but that is negotiable. Spot price per gram as of Friday is 262 RMB, so once taxes are removed the margin is pretty thin.

The chain necklace [photo #3 below - Ed] for example is 84.9 grams of 24K and price quoted is 26,150 RMB. Works out right about \$50 U.S. per gram, which is not bad given spot is \$42.60.

From what my wife tells me as much as 50% of gold jewelry sales for the year occur in the January lead up to spring festival. -- Tim













It was another weekend with a lot of stories---and the lion's share of the international news items involve the Ukraine, as it's Planet Earth's number one news story at the moment. With the odd exception, I've lumped them all under one heading as I did last week.

☐ The Wrap

The bottom line is that JPMorgan has taken delivery of close to 4,000 silver contracts (20 million oz) since

December and is in position to take another 3 million oz if March plays out as I've outlined. I still maintain that this a small percentage of the 100 to 200 million physical oz (or more) of silver that I believe JPMorgan has acquired over the past three years. - [Silver analyst Ted Butler](#): 01 March 2014

I wasn't surprised to see both gold and silver take off to the upside when trading began on Sunday night in New York---and neither was I surprised to see the sellers of last resort at their posts. Like I said further up, JPMorgan et al were selling longs and going short against all comers all day long yesterday, especially in the early going. It's pretty much a given that this Friday's Commitment of Traders Report will be as ugly, if not more ugly, than the one we got last Friday. Today at the close of Comex trading is the cut-off, so we'll see what the rest of the Tuesday trading day brings.

The precious metals didn't do much price wise in Far East trading on their Tuesday---and shortly before 2 p.m Hong Kong time, the HFT boyz showed up and took both silver and gold down a notch or two. Platinum and palladium weren't spared, but the damage there was minimal. London has been open about 10 minutes as I type this paragraph---and gold volume is already well north of 30,000 contracts---and silver volume is over 10,000 contracts. The dollar index, which barely made it above the 80.00 mark in early trading in the Far East, is now back below that mark.

I have no idea what the trading day will be like for the remainder of the Tuesday session, but based on what's happened so far, it ain't looking good.

I'm off to bed early, as I'm feeling pretty wretched at the moment---and if I feel like this tomorrow evening, I probably won't have a column on Wednesday.

See you tomorrow---maybe.



This is an abbreviated version of [Ed Steer's Gold & Silver Daily](#) Sign-up to have to the [complete market review delivered to your email inbox each morning](#) for free.

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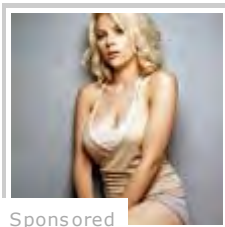
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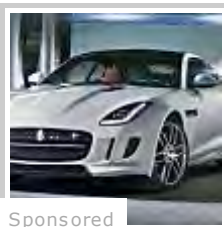
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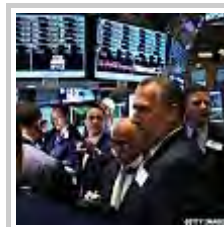
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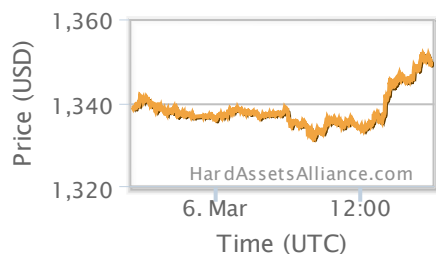
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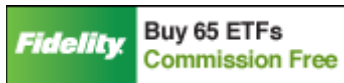
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Exhibit O

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For the Fiscal Year Ended

September 30, 1990

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FEDERAL TRADE COMMISSION

JANET D. STEIGER, Chairman
TERRY CALVANI, Commissioner*
MARY L. AZCUENAGA, Commissioner
ANDRE J. STRENIO, JR., Commissioner
MARGOT E. MACHOL, Commissioner**
DEBORAH K. OWEN, Commissioner***

DONALD S. CLARK, Secretary

* From November 18, 1983 to September 25, 1990.

** From November 29, 1988 to October 24, 1989.

*** Sworn in October 25, 1989.

Group America, Inc.

The Commission filed a complaint against Group America, a California brokerage firm, and three individuals. Defendants were charged with misrepresenting the investment potential of their leveraged investments in precious metals and foreign currencies, and falsely representing that an investment with them was substantially risk-free. The court issued a temporary restraining order prohibiting further misrepresentations and freezing defendants' business and personal assets.

GTP Marketing, Inc.

The Commission obtained a preliminary injunction against GTP Marketing and six other defendants, prohibiting them from making multiple misrepresentations in connection with the sale of water processors. The court previously issued a temporary restraining order halting the misrepresentations, froze the defendants' assets, and appointed a temporary receiver for one of the companies.

Hannes Tulving Rare Coin Investments

The Commission filed a complaint charging Hannes Tulving, a California retail marketer of numismatic coins, with misrepresenting the degree of risk to customers who purchased its coins, concealing its artificial market by referring customers to fictitious price increases, and failing to maintain sufficient reserve funds to honor its buy-back guarantee. The parties agreed to a stipulated preliminary injunction prohibiting further misrepresentations, freezing their assets, and appointing a temporary receiver for the corporate assets,

Honeyacre Corporation

The Commission obtained a stipulated permanent injunction against William and Margaret Skaife, d/b/a Honeyacre Corporation. The injunction prohibits them from violating the Franchise Rule and from misrepresenting that agricultural business ventures will achieve specific gross earnings or that the Skaifes will provide technical assistance.

International Marketing Data

The Commission obtained an agreement with International Market-

Exhibit P



FEDERAL TRADE COMMISSION
PROTECTING AMERICA'S CONSUMERS

MAIN MENU

SEARCH

Aging Analysis of Redress Funds Held on Account: Memorandum to Jodie Bernstein, Director, Bureau of Consumer Protection

AUDIT REPORT NUMBER: 00-047

MEMORANDUM

TO:	Jodie Bernstein Director, Bureau of Consumer Protection
FROM:	Frederick J. Zirkel Inspector General
SUBJECT:	Aging Analysis of Redress Funds Held on Account

The Office of Inspector General has completed its audit of the FTC's FY 1999 financial statements. As part of this audit, the audit team reviewed cash balances held by the agency's three redress contractors and by the FTC in a U. S. Treasury suspense account. Funds with contractors represent, for the most part, amounts to be distributed to consumers, while funds in the U.S. Treasury suspense account are usually (i) provided to contractors for eventual distribution to consumers, or (ii) disgorged to the Treasury. On only rare occasions will the FTC make distributions directly to consumers from its suspense account.

As of September 30, 1999, the agency's three redress contractors were holding \$29.9 million in funds on FTC cases. This represents a 63 percent increase in funds held by contractors on September 30, 1998 (\$18.3 million). Similarly, there was a 23 percent increase in funds held in the Treasury's suspense account, from \$4.3 million on September 30, 1998 to \$5.3 million on September 30, 1999.

Based on our aging analysis of these cash accounts and discussions with case managers, it appears that funds are unnecessarily sitting in accounts instead of flowing through to either consumers or the U.S. Treasury. Of course, the longer the delay in providing redress (whether for justifiable reasons or not), the fewer the number of consumers who will ultimately receive any redress. This is the result of predictable consumer mobility. While we recognize that redress may be delayed pending the completion of collection efforts, we believe that it is not in the best interest of consumers for the agency to hold funds for extraordinary lengths of time and still perform a

credible redress distribution.

Aging Analysis of Redress Funds Held on Account

TABLE OF CONTENTS

- Results of Analysis
- Old Funds on Deposit with FTC Redress Contractors
- Old Funds on Deposit in the FTC Suspense Account
- Conclusion
- OIG Analysis and Recommendations

Results of Analysis

To determine how long cash remains in an account along with the reasons why aged funds are held pending redress or disgorgement, an aging analysis was prepared (See [Attachment](#)). Using this analysis, the OIG identified 30 cases with funds on deposit with redress contractors totaling \$10 million that were two years old or older on September 30, 1999. This amount comprised one-third of the \$29.9 million in the redress contractors' accounts on this date.⁽¹⁾ Discussions with case managers on six (6) of the largest cases totaling \$7.5 million of the \$10 million revealed that funds have been on deposit awaiting final disposition for between 24 and 106 months, with a median of 43 months.

The OIG's reconciliation and aging analysis of the FTC Suspense Account at Treasury (Account No. 6875) found that of the \$5.3 million in this account on September 30, 1999, \$2 million from 33 cases was between 24 and 127 months old and awaiting final disposition. The OIG selected five (5) of these largest cases with a median age of 55 months, totaling \$1.1 million, for detailed review.

The OIG interviewed staff attorneys, RAO personnel and FTC redress contractor staff to identify the reasons for maintaining funds on account for such long periods of time. We also reviewed account activity statements for the suspense account, monthly contractor redress reports, and case judgments. Below is a synopsis of the case information we collected.

Old Funds on Deposit with FTC Redress Contractors

With few exceptions, all funds on account with the redress contractors were deposited with the expectation of providing redress. The six cases we reviewed with \$7.5 million on deposit were opened between 1987 and 1996.

1. Career Information Services (X960058). The stipulated final judgment was issued March 17, 1997. Funds have been on deposit since April 1997 (\$350,000) with additional deposits and interest earnings through 09/30/98 of \$1.2 million. As of 09/30/99, there was \$1,642,000 on deposit with the contractor. There has been no redress activity on the case. The FTC and the contractor have been unable to locate consumers. FTC staff told the OIG that disgorgement will be made only after other alternatives, including consumer education, are considered.

2. American Computer Industries (X950055). A stipulated final judgment was issued November 22, 1995. An initial deposit of \$677,300 was made to the contractor's bank account in February 1996. Since then, there has been sporadic deposits and interest earnings bringing the balance on account as of 09/30/99 to \$820,000. The attorney in charge of the case left the FTC for 18 months and told the OIG that he was surprised to learn that the funds were still on account with no distribution having occurred. He is currently working with the FTC redress contractor to identify claimants for a possible distribution.

3. South West Sunsites (X870011). A consent judgment was entered by the court on May 2, 1990. The defendants in this case paid just over \$1 million up front against a \$2.5 million judgment in late 1990 / early 1991. The contractor made an initial distribution on or about May 1991, and had planned a second distribution for June 1992 pending the receipt of more funds. Although the FTC attorney was able to collect an additional \$500,000 from the defendants in 1991 (shortly after the first distribution), this was far less than expected and no additional funds were collected. In 1992, the case was referred to DOJ for collection. At the time, the FTC thought money would be collected by DOJ as the guarantors had money. DOJ sued the guarantors of the judgment, but collected nothing.

As of 09/30/99, there was \$710,000 on deposit with the contractor. The FTC attorney told the OIG that she believes that no more money will be collected and would like to make a second distribution with the \$710,000. She has stayed in contact with some consumers, although locating the whereabouts of the 1,500 consumers originally scammed will be difficult after nearly eight years. The attorney told the OIG that she has spent no time on this case for years, and will need some additional time to close out the case, e.g., get consumers their money.

4. Metropolitan Communication (X940024). A final judgment against select defendants was handed down by the court on or about July 1994, resulting in an initial deposit of \$220,000 into the contractor's account. Additional judgments against remaining defendants were handed down by the court in September, 1997, resulting in another deposit of \$1.6 million to the contractor. \$1,925,800 was on deposit with the contractor as of 09/30/99. There has been no distributions made on this case. The case is in receivership. A distribution plan was submitted to the court in the fall of 1999. The receiver is awaiting the court's approval of that plan.

5. United Wholesalers (X950004). Final judgment was handed down by the court on January 5, 1996. The FTC attorney told the OIG that the contractor has been holding \$1.2 million since early 1996. As of 09/30/99, there was \$1,459,000 in the account. The FTC provided the contractor with "tap cards" seized from the defendant which the contractor used to perform a postal check for valid addresses. However, according to the FTC attorney, the contractor cannot do the distribution because the receiver has not filed a final report with the court pending income tax and asset-ownership issues. According to FTC staff, these tax/asset ownership issues have been on the table since the signing of the consent order in early 1996.

Recently, FTC staff have considered preparing a motion to the court for permission to distribute the funds held in the account to consumers. According to staff, the customer list will need to be updated due to the delays in distributing funds, which will be paid for with funds on account with the contractor, resulting in less funds for consumers.

6. Twinstar (C3307). The court order became final October 2, 1990. According to contractor staff, the first deposit was made on 11/6/90 for \$500,000. Another deposit was received in May 1995 for \$275,000. There was \$940,000 on account at the contractor as of 09/30/99. Growth in the account is attributed to interest earnings as there has been no other deposits and no redress made from this account. Contractor staff did not know what the attorney planned to do with the money - redress or disgorgement. Contractor staff told the OIG that it will hold the money and keep the account open until told otherwise by the FTC attorney. The FTC regional office case manager was on a leave of absence during the audit and thus was not available to discuss the case. The RAO could not provide any additional information on the status of the distribution for the case.

Old Funds on Deposit in the FTC Suspense Account

Funds maintained in the FTC suspense account (Account No. 6875) generally represent funds awaiting disposition (i) to the contractor for redress, or (ii) to the general fund of the Treasury (disgorgement).(2) No interest is paid on funds held in the suspense account. In the five largest dollar cases reviewed by the OIG, funds

have been on deposit for between 51 months and 127 months. In the one case with funds 127 months old, regular deposits were received for 10 years beginning in 1989. The five cases we reviewed were opened between 1988 and 1995.

1. Robbins Research (X950044). A consent decree was entered on June 14, 1995. There has been \$221,300 sitting in the FTC redress suspense account since then with no activity. An attorney told the OIG that he was surprised that no action has been taken on the case, and incorrectly speculated that the funds were possibly a civil penalty payment.⁽³⁾ He said that the attorney most familiar with the case, and who worked on this aspect of it, has since left the Commission.

2. Pase Corporation (X940059). An order for final judgment was entered February 6, 1997. (A summary judgment was presented to the judge in 1995, but the judge did not issue her ruling until February 1997.) As of 09/30/99, there was \$293,000 in the suspense account. According to the FTC attorney, the case involved a \$16 million judgment. She identified \$2.7 million in liquid assets and automobiles that could be liquidated. The FTC collected \$16,400 in March 1995 and \$10,000 in April 1998 from the defendants. The case was referred to Treasury, which has collected an additional \$267,000.

Many consumers lost upwards of \$20,000 in the scam, with the bulk of the scam occurring in 1994. There are 100,000 consumers eligible for redress, although the FTC attorney admits that the chances of locating many of them now is not good. She feels that \$293,000 is not enough to do a credible redress distribution when the total loss was upwards of \$16 million.⁽⁴⁾

3. Academic Guidance Services (X920073) A consent order was signed July 16, 1993. As of 09/30/99, there was \$187,000 in the FTC's suspense account at Treasury. There were two deposits - both wired from the contractor: \$180,000 was wired in April 1995, and another \$7,300 was wired in December 1995. The case manager left the FTC and the OIG was unable to identify another current FTC attorney who could respond to our questions about the case.

4. Atlantex/Petro Fund (X880045) The final judgment was issued November 25, 1987. The first deposit was received in the FTC suspense account in February 1989 for \$6,500. Miscellaneous collections have been deposited in the account for approximately 10 years for amounts between \$9.16 and \$21,000. The case was also with Treasury for collection, with its last collection on September 18, 1998, for \$22,500. As of 09/30/99, there was \$197,200 in the suspense account. The FTC attorney told the OIG that she instructed the RAO months ago to have the money in the account disgorged as no additional funds are anticipated. According to RAO staff, RAO policy is to disgorge funds only upon written notification from the attorney. RAO staff told the OIG that it received no written instructions to disgorge funds on this case.

5. Hannes Tulving Rare Coin (X900050) A consent order was signed by the court on June 22, 1992. The financial records for this case show that the defendant complied with the order and made all payments between 1992 and 1997. There has been no payment activity since December 1997. As of 09/30/99, there was \$245,309 in the account. According to the FTC attorney, because so little was collected relative to the value of the scam (estimated at \$10 million or more), redress was never considered.

The FTC attorney told the OIG that he asked the RAO to disgorge this money on or about June 1997 when the last payment was made. He told the OIG that he never followed up with the RAO to determine whether funds were disgorged. The OIG did not locate a memorandum to disgorge funds in RAO's case file.

Conclusion

The OIG met with RAO staff to determine what procedures it follows to monitor the aging of account balances and to evaluate the reasons for such long periods of inaction. RAO staff told the OIG that they do monitor cases

including the flow through of funds in the contractor and suspense accounts. But staff admitted that it is the case manager, not the RAO, that makes the final decision on whether to close an account and/or disgorge the funds. RAO staff and some attorneys we spoke with told the OIG that if redress is not possible, other consumer-related uses for the funds are considered before funds are disgorged to the general fund of the Treasury. Exploring these alternatives is often a low priority when other pressing job demands are juxtaposed against it. Consequently, while these alternatives are being explored, funds often sit in accounts for many years.

The OIG believes that in at least eight of the 11 cases we reviewed, funds were deposited with the intention of providing redress to consumers.⁽⁵⁾ But because of staff attrition, new case demands, receiver control of assets, and the endless wait for defendants to make most if not all payments due from them without any management deadlines established, funds often remain in these (contractor and suspense) accounts for extensive periods of time. Although redress may still occur on some of these cases, most likely funds will be disgorged on most of them. The risk of delay in making a belated distribution is to lose contact with defrauded consumers. Consumers fortunate enough to have stayed in touch with the FTC and/or did not relocate, will get a larger share of the redress because, in addition to their share, they will also receive that portion belonging to those consumers the agency can no longer locate.

The OIG questions the utility of allowing funds to remain in contractor bank accounts or the Treasury suspense accounts for long periods. Based on our analysis of the 11 cases presented above, the OIG has identified nine (9) cases totaling \$6.5 million with funds that could have been turned over to consumers, or in some cases deposited in the Treasury General Fund more quickly if management oversight of these cases was in place. Consequently, the OIG estimate of funds put to better use is \$6.5 million.

The OIG met with RAO staff to discuss the findings and recommendations contained in the report. RAO agrees with the recommendations and is developing a strategy to best implement them. BCP and regional office staff greatly assisted our review.

OIG Analysis and Recommendations

To address the issues raised in this report, the OIG recommends that BCP management take the following steps:

Recommendation 1a. RAO review all cases that have funds in the FTC suspense account to determine if a redress distribution is appropriate. In those cases where redress is considered appropriate, the funds for these cases should be immediately transferred to contractor accounts so interest can be earned on the balances pending the distribution. If a distribution is not deemed practical, the funds should be disgorged to the U.S. Treasury.

Recommendation 1b. When an alternative to disgorgement is to be investigated by staff, management agree to this approach and establish a firm due date for when the review and/or action is to be completed.

Recommendation 1c. To facilitate the fiscal year 2000 financial statement audit, RAO provide the OIG on or before 10/31/00 with a summary detailing management's decision on each suspense account case.

Discussion: With Department of Treasury regulations regarding funds held in suspense account #6875 set to become effective June 30, 2000, the FTC (and other Federal agencies) will no longer have a suspense account option to deposit funds for extended periods. Rather, a temporary fund will be established for flow-through purposes. That is, funds can be deposited in the Treasury by defendants in FTC cases for transfer to an FTC contractor. However, funds will not be permitted to reside in this account for extended periods as they have in the past.

Recommendation 2. BCP centralize in the RAO the authority to monitor and set deadlines for staff to dispose of redress funds. Reasons given for redress distribution delay, whether by staff, contractors or receivers, need to be documented and routinely reported to senior management.

Discussion: Based on our discussions with agency staff regarding the disposition of funds held in contractor and FTC suspense accounts, the OIG believes that most explanations for maintaining funds in these accounts for two years or longer simply do not justify this outcome. The press of other cases and responsibilities faced by staff preclude their full attention to distribution-related issues, often resulting in funds maintaining their suspense status for longer than optimal time periods. Further, even when staff attention is directed at collecting all or most funds owed consumers, this effort itself has been shown to delay the actual distribution of funds to consumers, resulting in less consumers receiving more money (as opposed to more consumers receiving somewhat less). In addition, FTC staff occasionally leave the agency, resulting in further delays in addressing these issues.

Decisions regarding when to make distributions, and whether to make multiple distributions, must be made with management input. The OIG believes that these decisions should be made within certain time frames to ensure that the maximum number of consumers will benefit from FTC efforts to redress their injury, or conversely, provide the funds to the U.S. Treasury when redress is unlikely.

Recommendation 3. The OIG recommends that RAO investigate whether \$58,000 in payments made to the Treasury's Debt Management Service and the Department of Justice for FTC v. Pase Corporation (x-940059) are valid payments in keeping with existing interagency agreements with the two agencies.

Discussion: While the OIG has observed several instances of successful collection of past due judgments by the Department of Treasury or the Department of Justice, we have not observed an outcome where the Department of Treasury and the Department of Justice have together played a role in such outcomes. The concern for the OIG is twofold: (i) that over \$58,000 has been paid out, and was still being paid out as of 09/30/99, to both agencies; and (ii) that the case manager, RAO staff and/or the Assistant CFO for Finance could not explain why this fee was being collected.

Endnotes:

1. The OIG initially went back only two years (09/30/97) to identify our sample of cases because records were readily available within the agency for this period. For the six cases selected for detailed review, we held discussions with FTC and contractor staff to identify relevant events preceding this date.
2. New regulations from the Department of Treasury regarding funds held in the U.S. Treasury suspense account, effective June 30, 2000, require agencies to review all funds in this account to either (i) transfer to other deposit accounts, or (ii) close the account. Funds will no longer be permitted to remain on deposit for months or years pending a decision on their disposition.
3. The consent decree states that funds paid by the defendant are to be used to provide consumer redress.
4. On this particular case, the OIG also noted that both the U.S. Treasury collection service and the Department of Justice have assessed collection fees of approximately \$58,000 during August - September, 1999. Based on our review of cases, this dual assessment of fees is unusual. Neither the case manager nor the Assistant CFO for Finance knew of or could explain this deduction.
5. Robbins Research, Pase Corporation, Academic Guidance Services, American Computer Industries, South

West Sunsites, Metropolitan Communications, United Wholesalers, and Twinstar.

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FTC Accuses Big Coin Dealer, Appraiser : Investment: In two separate Orange County cases, the agency says the dealer ran a Ponzi scheme and the appraiser favored good customers.

August 17, 1990 | GREGORY CROUCH | TIMES STAFF WRITER

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The Federal Trade Commission filed complaints Thursday against one of the nation's biggest coin dealers and the industry's largest appraiser, claiming both Orange County firms misled investors.

The two civil cases are separate and unrelated.

The FTC charged Newport Beach-based Hannes Tulving Rare Coin Investment with running a Ponzi scheme that defrauded investors out of more than \$40 million. The complaint, filed in U.S. District Court in Los Angeles, said the firm had 4,600 customers last year.

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In a separate case filed in U.S. District Court in Washington, the FTC charged Irvine-based Professional Coin Grading Service with failing to live up to advertising claims that it graded coins on an objective basis. The company--whose grading service has become an industry standard--has certified \$2.5 billion worth of coins since it was founded four years ago.

Both companies denied the accusations.

"We charged a fair value for our product and we have the documentation to prove it," said Tulving's owner, Hannes Tulving Jr.

He has consented to a court-appointed receivership of his 14-year-old firm, which will allow regulators to run the firm while trying to figure what it has left in the way of assets.

The FTC maintained in its complaint against Tulving that the company had created an artificial market, getting customers to buy coins at inflated prices so it could then turn around and honor a longstanding buyback policy for investors wanting to cash in their collections.

"By 1989, defendants were selling many of their coins for three to five times what the coins were worth,"

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according to the FTC complaint.

This was done, the FTC says, to try to keep alive what it says was a three-year Ponzi scheme.

Tulving "relied on sales of coins to new purchasers at increasingly high prices in order to have money on hand to permit earlier purchasers to liquidate their coins at a profit," the complaint said.

The company charged a 24% commission, based on the prices it charged.

And it published a magazine--under the name Cameo Enterprises--that purported to show prevailing market prices. But Tulving owned Cameo and the prices listed were prices he set, the FTC complaint said.

The FTC has asked the court to compensate investors, whom the FTC estimates are out more than \$40 million once they decide to cash in the coins at legitimate dealers.

PCGS, meanwhile, was accused of failing to live up to its promises to certify coins on an objective basis.

"PCGS has not provided objective or consistent grading," said the FTC complaint against it. "PCGS does not in all cases observe its strict anti-self-interest policy."

FTC sources indicate the company was grading coins more favorably for preferred customers, something executives there strongly deny.

PCGS sent a letter to dealers earlier this week calling the FTC allegations "obviously untrue" but signed a consent decree in which it agreed to publish additional disclosures about its service and submit its advertisements to the FTC before they are made public.

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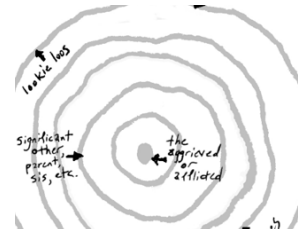
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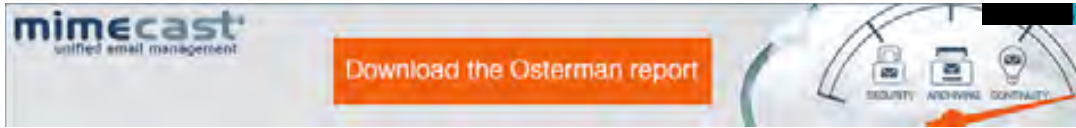
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Coin Dealer Agrees to Settle FTC Charges: Hannes Tulving Jr., whose company was once among the most prominent U.S. dealers in rare coins, has agreed to settle Federal Trade Commission charges that he inflated the prices of his coins by creating an artificial market for them. In August, 1990, the FTC filed a lawsuit in U.S. District Court in Los Angeles seeking \$40 million on behalf of investors for whom it purchased rare coins for as much as five times what they were worth. Tulving's company, Hannes Tulving Rare Coin Investments Inc. in Newport Beach, was placed in receivership. Tulving had agreed to a \$10-million judgment, but the federal court lowered his payment to \$260,000 over five years--a total of \$1.2 million--based on his ability to pay. The FTC's suit against the company itself is still pending.

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